



City of
BRADFORD
METROPOLITAN DISTRICT COUNCIL

Statement of Consultation (including Schedule of Changes)

Landscape Character Assessment Supplementary Planning Document (SPD)

December 2025

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1. Introduction

- 1.1 This Statement of Consultation has been prepared for the draft Landscape Character Assessment Supplementary Planning Document (SPD).
- 1.2 It is intended that the Landscape Character Assessment will be adopted as an SPD. The new Landscape Character Assessment SPD will provide up-to-date details and additional guidance in relation to Policies EN4: Landscape and DS2: Working with the Landscape of the adopted Core Strategy (2017). The SPD will primarily be used by landscape and planning officers to assess development proposals as part of the determination of planning applications, ensuring that they respond to the sensitivities of the relevant landscape character type/area in which they are situated. It will also be used by developers when designing their schemes and also by other landscape professionals working on landscape-scale projects.
- 1.3 Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Council's Statement of Community Involvement (SCI) require that before adopting an SPD Local Planning Authorities must allow anyone to make representations on the document for a period of not less than four weeks, and that they must prepare a statement setting out:
- The people who were consulted.
 - A summary of the main issues raised.
 - How those issues have been addressed in the SPD.
- 1.4 The consultation process took place in two stages. The first stage involved early engagement with key stakeholders and groups. The second stage involved a formal four-week consultation period on the draft document. These are detailed below.

Stage 1 – Early Engagement

- 1.5 A workshop took place to inform the preparation of the draft Landscape Character Assessment (LCA) including representatives from:
- **Statutory consultees:** including Natural England, Historic England, Environment Agency, neighbouring Local Authorities.
 - **Special interest local groups:** such as Farmers representatives, Yorkshire Wildlife Trust.
 - **Landowners and managers:** including Yorkshire Water.
 - **Other key organisations:** West Yorkshire Ecology Service, West Yorkshire Archaeology Advice Service
 - **Council officers from relevant departments:** including Planning, Landscape, Design and Conservation, Countryside & Rights of Way, Parks & Greenspaces, Drainage.

- 1.6 Further details of the early engagement process can be found in Appendix C: Consultation Summary of the main LCA SPD report. The comments and viewpoints shared at the workshops fed into the preparation of the LCA.
- 1.7 A specific consultation exercise was also carried out with Parish/Town/Village councils which involved draft versions of the Landscape Character Types and Areas and the key characteristics sections being sent out for comment. A questionnaire was prepared to enable a focused response to be collected.
- 1.8 Following this engagement stage the consultants completed their final draft in November 2023 and this was the document which was subject to consultation.

Stage 2 Formal consultation

- 1.9 The formal four-week consultation period took place between **Friday 14th November and Friday 12th December 2025**. This allowed members of the wider public and other organisations to have input into the content of the Landscape Character Assessment. The following documents were made available for public comment:
- Landscape Character Assessment Supplementary Planning Document – Consultation Draft
 - Strategic Environmental Assessment (SEA) – Initial Screening Statement
 - Habitats Regulations Assessment (HRA) – Initial Screening
 - Equalities Impact Assessment (EIA) – Initial Screening Statement
- 1.10 Electronic versions of the consultation documents were published on the Council’s website (on the planning policy pages) and on the Council’s planning consultation portal (JDi’s OpusConsult). Paper copies were placed in the relevant deposit locations listed below:
- Council’s principal office:**
- Britannia House, Hall Ings, Bradford, BD1 1HX
- Other Council offices:**
- Keighley Town Hall, Bow Street, Keighley, BD21 3PA
- Main Council libraries:**
- Bradford Local Studies Library, Margaret McMillan Tower, Princes Way, Bradford, BD1 1NN
 - City Library, Centenary Square, Bradford, BD1 1SD
 - Shipley Library, 2 Wellcroft, Shipley, BD18 2QH
 - Bingley Library, Myrtle Walk, Bingley, BD16 1AW
 - Keighley Library, North Street, Keighley, BD21 3SX
 - Ilkley Library, Station Road, Ilkley, LS29 8AH
- 1.11 The Council’s online consultation system (JDi OpusConsult) allowed people to read the document and directly comment against particular sections of the document online.

- 1.12 Notifications of the consultation and details on where to view the document were given in a consultation letter/E-mail and on the Council’s website. The Council’s ‘Stay Connected’ consultation database was used to send notification of the consultation to those people who have specifically signed up to receive information on the preparation of the Local Plan, including SPDs.
- 1.13 Representations were received during the consultation from a range of individuals, landowners and their agents, statutory bodies and other interested organisations (a full list is provided in Section 2 of this document). There was some support for the new Landscape Character Assessment and approach taken in the SPD, as well as some more general comments and objections which suggested alterations and changes to improve the document.
- 1.14 The comments received from the public consultation have been incorporated into the document as far as possible. Whilst there have been no significant changes to the application or purpose of the SPD, further detail has been added to some of the guidance sections and factual updates have also been made.
- 1.15 The detailed representations raised through the consultation, the Council’s response to them and the recommended changes are set out in Section 3 of this document.

2. List of respondents

- 2.1 A total of 17 people/organisations commented on the draft SPD. These submissions were broken down into 57 individual representations. The table below lists the respondents along with their own individual reference number which can be used to cross-reference with the summary of responses and the recommended changes in Section 3.

Table 2.1: List of respondents

Respondent ID	Organisation	Name / Position
639		Helen Jacques
1509	Canal and River Trust	Simon Tucker
508		Bruce Barnes
30557	National Highways	Simon Jones Esq.
94	The Coal Authority	Melanie Lindsay
611		Chris Scurrah
2319		David Smith
7781	Acrehowe Limited	Michael Walton
750	SDS Land Ltd	Joe Isle
7783 / 5310	West Yorkshire Archaeology Advisory Service	David Williams
7782 /	Wilsden Parish Council	Peter Allinson
7686 / 4639	Yorkshire Wildlife Trust	Florence Bill
7789 / 7788	Minerals Planning Group	Eleanor Davies
6566 / 6565	Hallam Land Management	Suzanne Yates
7786 / 20	Natural England	Lindsay Robinson
7711		Nigel Kenyon
5464/7065	Addingham Civic Society	Malcolm Keeble

3. Representations & Schedule of Responses

Table 3.1: Representations and Responses on the Landscape Character Assessment SPD

Chapters 1 & 2: Introduction and Methodology

Comment ID	Respondent ID	Comment (Full text)	Council Response
30549	7711	As far as I can tell from the deluge of information you have provided (read "overwhelmed me with"), these seem to be well-considered and sensitive ideas, taking care to preserve and/or restore heritage features, whilst accommodating best new practices.	Comment noted. Recommended change: None
30553	508	The expansion of fast food establishment, both drive in and static, has a substantial impact on the street environment particularly in inner city areas where the availability of parking space provides an opportunity for littering, rodent infestation and late night anti social behaviour. The current planning arrangements for such establishments are not working and the sensible option is to have a freeze on further planning approvals of fast food establishments-those establishments that already have planning approval will not materially be affected, and those establishments that had approval in the past but have closed during the economic downturn will continue to be available.	The comments and content of this representation are not relevant to the Landscape Character Assessment SPD. The SPD does not cover aspects related to fast-food establishments. Recommended change: None
30557	1509	Thank you for your consultation on the above document. 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	Comment noted. Recommended change: None

Comment ID	Respondent ID	Comment (Full text)	Council Response
		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 have reviewed the document/policies contained within the document and based on the information available we have no comment to make.	
30558	4772	Thank you for the consultation received in regard to the two SPD's attached. I can confirm that the Secretary of State for Transport [SoST] has no formal comments to make in relation to these topic areas but will continue to remain a Statutory Consultee for the Local Plan, and associated consultations in connection to the transport network under their control.	Comment noted. Recommended change: None
30559	94	Thank you for your notification of the 14th November 2025 seeking the views of the Coal Authority on the above. The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. Our records indicate that within the Bradford area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported	Comment noted. Recommended change: None

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>surface hazards. These features may pose a potential risk to surface stability and public safety.</p> <p>It is noted that this current consultation relates to a Landscape Character SPD and I can confirm that the Planning team at the Coal Authority have no comments to make on this.</p>	
30565	2319	<p>Thank you for the opportunity to comment on the Draft Landscape Character Assessment Document, an important document that I should like to warmly support. My interest lies in the area known as Bronte Country, that is Area A2, parts of B1 and B2, and C2. I have put together a short report to explain my views, and I hope that BCC will take these into account and continue to provide strong protection for this combined area and look for enhancements too. I make the point in the report that the landscape has suffered degrees of decline over the last 55 years and examples are provided in the attached two photos from 1970:</p> <ol style="list-style-type: none"> 1. Taken mid-way between Cross Roads and Oxenhope and looking toward Haworth this view has largely disappeared because: <ul style="list-style-type: none"> - houses have been built on the green belt on the fields to the right of the river; - trees now cover some of the slopes to the right; - the mill goyt near the foot of the slope has dried up; and <ul style="list-style-type: none"> - the mills in the background have been allowed to become derelict. 2. Taken opposite Haworth station this view has also disappeared because: 	<p>Comments noted.</p> <p>The Landscape Character Assessment has been prepared to provide further guidance in relation to new developments which may have an impact on the landscape, and to ensure that appropriate mitigation is put in place and that where possible landscapes are enhanced. The assessment has included a review of the cultural and social aspects of the landscape. In a number of the character areas specific reference is made to the literary associations with the Brontës and the importance of these landscapes. The guidance section also further reiterates the importance of the Bronte connection and the need to celebrate it through further interpretation.</p> <p>Recommended change: None</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>- houses have been built on this field, a footpath lost and large trees now dominate this scene.</p> <p>Bronte Country is a unique and important part of Bradford and British culture and brings in tourists from across the world. It needs the strongest possible protection into the distant future.</p>	
30569	7783	<p>Thank you for the opportunity to consult on the draft Landscape Character Assessment (SPD). We welcome the update to the 2008 document and support the Council's objective to ensure development is sympathetic to local character.</p>	<p>Comment noted.</p> <p>Recommended change: None</p>
30570	7783	<p>From an archaeological perspective, the landscape is so much more than a visual backdrop but a physical record of past human activity. While the draft SPD successfully identifies "Cultural and Historic Landscape Character," we wondered if the document could go further to recognise the archaeological potential of undeveloped land and the specific risks posed by environmental mitigation strategies.</p>	<p>Under the 'Pressures and Forces for Change' and 'Guidelines' sections of most Landscape Character Types reference is made to 'Heritage at Risk' and in a number of cases makes reference to the importance of archaeological features – including features not fully explored or understood. In relation to LCT A: Moorland Plateaux the guidelines specifically reference balancing the conflicts of moorland restoration and archaeology and in particular avoiding restoration works that may disturb deeper soil layers and affect undiscovered / unexplored archaeological features.</p> <p>However, it is recognised that further reference to archaeology under the guidelines for all LCTs could be made.</p> <p>Recommended change: Where appropriate include additional guidelines on the protection of archaeology under relevant LCT guidelines.</p>

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30571	7783	<p>Methodology and Data Sources (Chapter 2)</p> <p>We note that Table 2.1: GIS data lists "Historic Landscape Characterisation dataset" and "Heritage designations" as key sources. However, it does not explicitly list the West Yorkshire Historic Environment Record (HER) as a primary data source for non-designated assets.</p> <p>Comment: The SPD ideally could acknowledge that the maps provided within the document depict Designated assets (Scheduled Monuments, etc.) but do not reflect the full extent of the historic environment. The West Yorkshire HER holds data on thousands of non-designated sites (find spots, flint scatters, Roman roads) which are material considerations in planning.</p> <p>Recommendation: Would it be possible to add the West Yorkshire HER to Table 2.1 and include a disclaimer that the absence of mapped assets in this SPD does not indicate an absence of archaeological remains.</p>	<p>Agree that further clarification of the historic environment datasets used in the preparation of the LCA should be made – including reference to the Historic Environment Record (HER) and that the absence of mapped assets does not indicate an absence of archaeological remains.</p> <p>Recommended change: Update Table 2.1 to make reference to the Historic Environment Record (HER) and the possible presence of archaeological assets even if they are not mapped.</p>
30580	7783	<p>Post-Medieval and Industrial Archaeology</p> <p>The draft SPD makes frequent reference to the district's "industrial past" and "local building vernacular". It is vital that the SPD recognises post-medieval archaeology as a material consideration, not just "ancient" remains.</p> <p>Comment: The archaeological interest of Bradford District extends well into the 19th and 20th centuries. "Minor" industrial features mentioned in the text—such as delfs (quarries), coal shafts, spoil heaps, and</p>	<p>Consideration of potential archaeological assets has been included as part of the assessment of the historic environment. It is recognised that there may be as yet undiscovered archaeological assets within the different landscapes of the District. The Council's adopted Core Strategy Policy EN3: Historic Environment already requires the protection and enhancement of archaeological assets (both designated and non-designated). The NPPF also offers protection to archaeological assets and requires the Historic Environment Record to 'predict the likelihood that</p>

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		<p>aqueducts —are often viewed as "waste" or "landscaping issues" rather than historic assets.</p> <p>Recommendation: We advise adding a principle that: "Post-medieval and industrial features (including, early transport infrastructure, and water management systems) could constitute a significant archaeological resource. These assets should be recorded prior to removal or remediation to ensure the narrative of the District's industrial development is preserved."</p> <p>Suggested Standard Text for Inclusion To ensure consistency, we recommend inserting the following standard text into the "Guidance" section for all LCTs: "Archaeological potential is not limited to designated assets. Developers must consult the West Yorkshire Historic Environment Record (HER) at an early stage. In undeveloped areas, particularly pasture and valley floors, significant archaeological remains may survive below ground, protected from truncation. These require appropriate evaluation and mitigation in line with NPPF paragraph 200."</p> <p>We trust these comments are of some use and from a archaeological and heritage point of view their inclusion would ensure the historic dimension of the Bradford landscape is fully recognised.</p>	<p>currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future’.</p> <p>However, it is acknowledged that the consultee is making specific reference to post-medieval and industrial features, and that further recognition in the guidance section of each LCT of the importance of undiscovered archaeological assets should be made.</p> <p>Recommended change: Include additional reference to undiscovered and non-designated archaeological assets/features in the guidance section of each LCT.</p>
30587	7782	<p>We note that in 1.10 it is stated that “The landscape is the result of the interaction between people and place which gives an area a local identity. The ‘landscape</p>	<p>The new SPD has been prepared following Natural England’s guidance on Landscape Character Assessments (2014). As part of this work, the</p>

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		<p>wheel’ illustrates how the different natural, cultural, and perceptual attributes of a landscape combine to produce character.” It is our view that in developing the different character areas as illustrated in Fig 2.1 a disproportionate weight is given to natural characteristics as compared to community factors. This has resulted in idiosyncratic character area boundaries that lose the local identity of villages such as Wilsden. The 2008 Landscape Character Assessment SPD provided a dedicated assessment of Wilsden, given to consideration of the seven landscape types to be found in the village and drawing general conclusions for the entire area.</p> <p>The present draft emphasises the nature of the physical bedrock rather than arranging material by the way communities have grown up and moulded the landscape through activities in the past and will continue to do so in the future. This is not a particularly helpful arrangement as, in general terms community activity will affect the physical environment rather than the other way round, this is after all a planning document.</p> <p>As the Natural England guidance document points out “Landscape character may be defined as a distinct and recognisable pattern of elements, or characteristics, in the landscape that make one landscape different from another, rather than better or worse”. In our view this document fails to meet those objectives in the case of Wilsden. The community of Wilsden has become fragmented over three sections, C3, E1 and H1. This has</p>	<p>consultants (LUC) undertook a review of the approach used in the 2008 LCA SPD. As part of this review and taking account of the guidance, new Landscape Character Types and Areas were defined. The new SPD explains at paragraph 2.10 that: “<i>The update of the landscape classification for Bradford is based on a review of the 2008 approach, boundaries and new information on landscape change. The 2008 Landscape Assessment subdivided the district into ten LCAs. Within each of the LCAs there were several different LCTs. The 2022 approach has reviewed and rationalised the classification and identification of generic LCTs and then subdivided these into geographically distinct LCAs.</i>” The emphasis in this new Landscape Character Assessment is on defining landscape character types. This has looked at a variety of factors – natural & physical, perceptual & aesthetic and cultural & social. The Landscape Character Types surrounding Wilsden in the 2008 Landscape Character Assessment were mainly Mixed Upland Pasture, a part from a small area of Wooded Valley. In the new Landscape Character Assessment the main Landscape Character Type covering Wilsden is Mixed Upland Pasture, with the adjacent area to the north west of the village being classed as Upland Wooded River Valley. The landscape character types (which are the how the landscape is classified) are still essentially the same around Wilsden and therefore any guidance to be applied to them would work in a similar way as to that of the 2008 SPD. However, it is recognised that the naming of the Landscape Character Area (LCA) E1 is perhaps not fully</p>

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		<p>resulted in needless repetition and no sense of the whole. An example of where current document fails is the northern boundary of the E1 mixed upland pasture landscape character. The 2008 landscape character assessments made the B6144 the boundary between the Wilsden LCA and the Thornton & Queensbury LCA, a far more reasonable separation of the higher plateau from the surrounding LCAs.</p>	<p>reflective of the areas it covers. As such it is recommended that LCA E1 is renamed as: Thornton, Queensbury and Wilsden Mixed Upland Pasture.</p> <p>Recommended change: Rename the Landscape Character Area E1 to: Thornton, Queensbury and Wilsden Mixed Upland Pasture.</p>
30593	7686	<p>Where increased development is expected, due to the housing and employment targets⁵ set out in the Local Plan, mitigating negative impacts on nature should be considered from the outset. At YWT we encourage a proactive approach to nature conservation rather than a reactive one; as better outcomes can be achieved by working with nature than against it. A good example of this can be seen in planning peatland restoration on areas of peat moorland within the district:</p> <p>“There are substantial areas of upland heathland and blanket bog to the west of the District,” (para 1.21) (Introduction & Methodology Chapter- LCA SPD, September 2023)</p> <p><small>(⁵ Pg. 37, Bradford District Local Plan: “Policy SP8 Housing Growth sets out the proposed housing requirement for the district which after making an adjustment for clearance and windfall results in a need to make further provision for at least 27,672 dwellings over the plan period 2020-38.” 2017)</small></p> <p>Whilst the draft states that these areas are not earmarked for development, and rather the wooded valleys and areas of unimproved grassland that reside lower down the valleys are, these landscape areas are linked. Blanket bog is classified as an irreplaceable habitat⁶, development on irreplaceable habitat should</p>	<p>The guidance section for LCT A: Moorland Plateau includes a point on enhancement of areas of bog and peatland restoration. The SPD, although primarily a planning document providing guidance on new development, can also play a role in providing the strategy for managing the landscape in the District. Other non-development related projects can follow the guidance in the SPD. In relation to peatland restoration the SPD encourages this and identifies measures such as rewetting and removal of conifer plantations. The SPD can be used to encourage a proactive approach to nature conservation.</p> <p>The consultee makes further points in relation to this issue and the links between different landscape character areas and types. A further response is provided against comment 30954 below.</p> <p>Recommended change: No change in relation to this specific comment. (See further response to comment 30954 below).</p>

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		<p>be discouraged and would generally not be granted planning permission⁷ even under exceptional circumstances. Blanket bog is associated with areas of peatland as it is a surface level habitat that occurs above layers of peat. Blanket bog and peatland are classified as irreplaceable due to the millennia in which it takes to form and establish. Restoring degraded peatland and blanket bog in upland areas will have impacts on the areas of grassland and woodland lower in the valleys better suited to development, due to effects on hydrology and as a result impacts on flood risk. In addition, peatland restoration ensures that this habitat remains a vital carbon store:</p> <p>“Restoring damaged peatlands can help them soak up more carbon dioxide from the air and store it in plants and soil. This changes the whole ecosystem—affecting which plants grow and how the water chemistry works—which then impacts how peatlands take in and release greenhouse gases.”</p> <p>(Bogged down in carbon: adventures in peatland pools, September 2025, Yorkshire Peat Partnership)</p> <p>⁽⁶⁾ Irreplaceable habitat - GOV.UK</p> <p>⁷ Pg.56, para. 193, National Planning Policy Framework: “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁷⁰ and a suitable compensation strategy exists” (2024)</p>	
30598	7686	<p>Overall, we are pleased with the detailed analysis of the specific landscape characteristics within the district of Bradford. As the District faces increasing development pressures and the escalating impacts of climate change,</p>	<p>Support and comments noted.</p> <p>Recommended change: None</p>

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		<p>it is essential that planning guidance fully reflects the value, vulnerability, and interconnectedness of its diverse landscapes. We strongly support the inclusion of detailed, landscape-specific considerations to ensure that future development is sustainable, nature-positive, and aligned with the aims of both the Bradford Local Plan and the West Yorkshire Climate and Environment Plan.</p>	
30599	7686	<p>Protecting irreplaceable habitats and the internationally designated South Pennine Moors SAC SPA, is vital if the region is to deliver on net-zero commitments and prevent further biodiversity loss. In an effort to meet these targets, we feel the LCA SPD should advise against developing on peatland, even for renewable energy schemes such as on shore wind farms, as doing so would be counterproductive when considering the carbon emissions that degraded peat can release.</p> <p>Instead, we would advise the LPA focusses on peatland restoration and planning renewable energy generation in appropriate locations, to avoid the damaging environmental effects of development on peatland habitats.</p>	<p>The SPD cannot introduce new policy – only provide guidance on how to implement existing adopted planning policy in relation to the landscape. It is therefore not the place of the SPD to restrict certain forms of development. In addition, both the existing adopted Core Strategy and National Planning Policy Framework include safeguards for the potential environmental impacts of proposed renewable energy developments. Under the Moorland Plateau LCT, the SPD notes that renewable energy proposals (including wind turbines) could have a potential impact on the landscape in terms of reducing the remote quality of the LCT, and provides guidance in terms of looking to limit intervisibility to new renewable schemes in the wider context.</p> <p>However, it is acknowledged that renewable energy development in the moorland areas (particular in peatland areas) could have a negative impact in relation to carbon sequestration and biodiversity. Additional guidance will be included in relation to the siting of any such renewable energy proposal and their potential negative impacts on such assets which are important to the landscape character.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
			Recommended change: Include reference to the siting of renewable energy proposals and the sensitivities of peatland and blanket bog, and the potential negative impacts on these habitats in the moorland plateau landscape.
30600	7686	<p>Equally important is recognising the critical role that urban fringes and accessible natural greenspaces play in connecting people with nature, improving wellbeing, and enhancing ecological resilience. We encourage Bradford Metropolitan Borough Council to strengthen guidance around these areas, as well as explore the benefits of dark skies principles within planning guidance.</p> <p>By embedding strong ecological protections, promoting nature-friendly design, and adopting a proactive approach to conservation, the LCA SPD has the potential to guide development that not only meets local needs, but also safeguards Bradford Districts unique landscapes.</p>	<p>As part of the assessment of key characteristics and qualities of each landscape character type and area, consideration was given to the tranquillity and levels of light (through consultation with the CPRE’s dark skies mapping). The SPD highlights where there are pressures and forces for change which may affect the dark skies qualities of particular areas. It is acknowledged that better reference in the guidance sections for each of the LCTs where light pollution is identified as an issue could be strengthened to include reference and potential measures to avoid or reduce the impact of new or additional lighting as part of new development.</p> <p>Recommended change: Include additional guidance in the relevant LCTs in relation to avoiding or mitigating new and additional lighting as part of new developments.</p>
30601	7789	<p>Please find below our comment regarding the draft Landscape Character Assessment (LCA) Supplementary Planning Document. This comment principally relates to the methodology of the LCA (Chapter 1 and 2) but also relates to any valued landscapes named within the document, alongside any valued attributes or characteristics.</p> <p>"Valued landscapes should be named, and a robust methodology should be established for concluding what</p>	<p>The new LCA for the Bradford District provides a robust evidence base to inform policy development and development management decisions – guiding development that is sympathetic to local character and the qualities of the landscape.</p> <p>Paragraph 1.10 states that: <i>“Landscape character assessment is the process of identifying and describing such variations in character across a landscape. It seeks to identify and explain the unique combination of features and attributes (characteristics) that make</i></p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>is and what is not a valued landscape. This methodology should be consulted on as part of the creation of a new Landscape Character Assessment Supplementary Planning Document.</p> <p>Significant confusion has arisen across the district, due to an ad-hoc approach to valued landscapes, which has, in turn, led to inconsistent decision making.</p> <p>The Council's approach of valued characteristics adds a further layer of confusion, without clarity as to how these influence whether a landscape is valued or not in the context of the National Planning Policy Framework."</p>	<p><i>different landscapes distinctive. The landscape is the result of the interaction between people and place which gives an area a local identity.</i>" Paragraph 1.12 goes on to explain that: <i>"Understanding the character of place and evaluating an area's defining characteristics is a key component in managing growth sustainably and ensuring that the inherent character and qualities of Bradford's landscape can continue to be appreciated. Understanding of character can be used to ensure that any change or development does not undermine whatever is valued or characteristic in a particular landscape and help guide positive change that conserves, enhances, restores, or creates local character."</i> It is further noted that: <i>"This assessment for Bradford provides evidence to help protect valued landscapes and recognise the intrinsic value and beauty of the countryside."</i></p> <p>Although the NPPF (2024) makes reference to valued landscapes at para 187 a), it does not go on to define these or explain how they should be identified. The Landscape Institute has published a technical guidance note on 'Assessing landscape value outside of national designations'. This indicates that landscape value can be assessed as part of an evaluation stage of a landscape character assessment or as a follow-on study. A follow-on study would be used to identify the landscape qualities in relation to individual character areas or types. These are described as 'valued landscape characteristics' or 'landscape qualities'. The new LCA for the Bradford District identifies the key characteristics that are present in each landscape</p>

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			<p>character area/type and could be used to help identify where a particular landscape is valued or not. However, it was not within the scope of the new LCA to specifically determine which landscapes within the district are considered to be valued ones.</p> <p>The evidence-base in the new LCA may be used by the Council to identify which of the different landscapes in the District are considered to be valued ones in the future as part of the Local Plan process. However, it is not for this SPD to designate these areas.</p> <p>Furthermore, when looking at the landscape value of a specific site in its context, the guidance indicates that this should be done as part of a Landscape and Visual Impact Assessment (LVIA) or Landscape and Visual Appraisal (LVA). GLVIA3 (Guidelines for Landscape and Visual Impact Assessment) states that the value of a landscape should be assessed as one of two components of landscape sensitivity. It also notes that landscape value is not always signified by designation stating that: ‘the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value’. As such site specific proposals would need to carry out a specific landscape assessment to understand whether it is part of a valued landscape, whether the wider area is designated or not. It should be noted that the Council is preparing a Landscape Sensitivity Assessment for a number of the proposed Local Plan development sites. This provides an analysis of the landscape sensitivity of these sites and could be used in an assessment of whether the landscape in a valued one. This additional work will be</p>

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			<p>published alongside the draft (Regulation 19 Publication version) Local Plan.</p> <p>In addition, it is worth noting that the recently published new draft National Planning Policy Framework (NPPF) no longer makes reference to ‘valued landscapes’, therefore it may be that there is no need to look to designate them in the future.</p> <p>Recommended change: None.</p>
30606	7786	General: The format and content of the Landscape Character Assessment are found to be well laid out, clear and concise, with excellent use of sections, maps and photographs to help describe the baseline condition of the variety of Landscapes that comprise Bradford MDC.	<p>Comment noted.</p> <p>Recommended change: None</p>
30607	7786	Digitisation: The finalised output should include boundaries of landscape character areas available as digital files in a sharable format for use in GIS as a minimum and ideally also as zoomable maps on a web-based platform. Click throughs to the relevant PDF or webpage is useful although it should be noted that for public inquiry purposes, a version with number pages/ paragraphs is helpful.	<p>Consideration will be given to publishing the mapping data in a sharable format. A new interactive Landscape Character Map will be prepared and included on the Council’s website once the SPD is adopted.</p> <p>Recommended change: Prepare and publish an interactive map on the Council’s website of the Landscape Character Areas and other associated datasets.</p>
30608	7786	Updates: The new Bradford Pennine Gateway National Nature Reserve is an important addition which should be added to both the mapping and the relevant text.	<p>The SPD was prepared in 2022/23 before the designation of the new National Nature Reserve. However, it is accepted that given the time taken to publish the SPD it would be prudent to include reference to the NNR under the relevant Landscape Character Types/Areas.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
			<p>Recommended change: Include reference to the NNR in the relevant parts of the document and include on the relevant maps. Also update glossary (Appendix A with the NNR term).</p>

Chapter 3: LCA Type A: Moorland Plateau

Comment ID	Respondent ID	Comment (Full text)	Council Response
30550	639	The SSSL designation is to protect its public access, grazing rights and ecological value. Can it be clarified and indeed justified why the development of single windfall residences within the clearly developed suburban area of Ilkley are prevented in order to protect the moor? The boundary of LCA SPD is clearly defined and justified. Therefore, it is absurd the above minor developments are prevented to protect the moor!?. If this is justified by restricting the potential number of new residents who may utilise the moor for recreational purposes how are the 1000s of new residents in Burley will be prevented from accessing the moor. This does not make sense.	<p>This representation is not specifically related to the Landscape Character Assessment SPD. It appears to be commenting on the zonal approach of the South Pennine Moors in relation to new development. Details on this are provided in the Habitats Regulation Assessment document for the adopted Core Strategy and in the South Pennine Moors Planning Framework Supplementary Planning Document.</p> <p>In essence, new residential developments within 400m of the South Pennine Moors SPA/SAC are restricted due to the potential urban edge effects which can occur and have a significant effect on the ecological integrity of the moor (rather than the potential impacts from recreation – which can be suitably mitigated). The properties being developed on the edge of Burley will have had to make a contribution to mitigating potential recreational impacts from the new residents, but those properties are not within 400m of the moor and therefore the urban edge effects do not cause the same impact. This approach is based on a sound evidence base, with similar policies in place elsewhere in the country. The approach has been found sound at an examination in public as part of the adoption of the Bradford Core Strategy.</p> <p>Recommended change: None</p>
30566	2319	This landscape assessment is very welcome. It's production and much of its content can be well supported. The following statement provides an important basis for public consultation:	<p>General comments noted.</p> <p>Further response provided below associated with key bullet points made by the representor.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>Understanding of character can be used to ensure that any change or development does not undermine whatever is valued or characteristic in a particular landscape, and help guide positive change that conserves, enhances, restores or creates local character.</p> <p>These are important principles against which changes that have taken place in the past can be measured, as well as providing important guiding principles for ensuring appropriate development in the future. Britain remains a signatory to the European Landscape Convention and this provides a firm basis for ensuring the views of the public are taken into account.</p> <p>My particular area of interest is the geographical area often referred to as Bronte Country. I've known it for over 60 years, partly through being a life and founding member and volunteer with the Keighley and Worth Valley Railway. I've brought friends and relatives, coach trips and even a special train to Haworth, Bronte Country and the railway because the area provides such an interesting experience for a wide range of people. As a member of the National Trust, I've also frequently visited East Riddlesden Hall.</p> <p>I've taken many photographs over 60 years and they help track the extent to which some aspects of the landscape have changed in the past. It is also worth adding that the iconic Railway Children film, recorded in 1970, provides another very good insight into how the area around</p>	

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>Oakworth, Haworth, Oxenhope and surrounding moorland looked 55 years ago.</p> <p>My preference is to look at Bronte Country as a whole, taking together the Moorland Plateau (A2), the southern half of Keighley Moorland Fringe (B1), the western half of Haworth Moorland Fringe (B2) and the Worth Upland Wooded River Valleys (C2) as a single, unified whole. Combined they represent a substantial part of the south west Bradford district, as well as a major part of the area informally designated the South Pennine Park. A journey from Hebden Bridge to Oxenhope reveals this combined area at Cock Hill, similarly another excellent viewpoint is from the Denholme to Oxenhope Road overlooking Leeming, as well as other views that are provided by the various approaches to Haworth. Arguably, the area is worthy of the same level of protection as a National Park or Area of Outstanding Natural Beauty, and, hopefully, this is something that will be pursued further into the future. Maybe World Heritage status could be considered given the international importance of the area. Any developments that would make achieving this enhanced status more difficult need to be strongly resisted. Local farmers have a crucial role in maintaining and/or enhancing much of the local landscape in Bronte Country. They may well need financial support to encourage a sustainable approach to farming and maintaining the landscape.</p> <p>It is worth noting that Haworth village must be the most interesting village in the Bradford district by some</p>	

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>margin. It really does come alive at a 1940s event, but it remains popular with national and international tourists throughout the year. The Bronte Parsonage has its own particular attraction and supporters who wish to connect with the legend created by the Bronte family. Surrounding Haworth is the iconic landscape that gave rise to the writings of the three sisters. Furthermore, The Worth Valley Railway attracts 100,000 plus passengers per year, many of them wishing to reconnect with the Railway Children film from 1970 as well as the many other films that have taken place since. The railway also provides an ideal way of connecting Haworth to the main line railway at Keighley. And the journey along the railway is full of contrasts and makes an ideal way to journey from Keighley to Haworth and Oxenhope.</p> <p>As mentioned above my photographs along with the Railway Children film give an indication of the extent of a decline in some aspects of landscape quality since 1970. For example, it is worth mentioning the following:</p> <ul style="list-style-type: none"> • loss of mill ponds and the goyts that feed into them such as between Oxenhope and Haworth and at Mytholmes. The mill pond near Ebor Mill is now in poor condition • loss of mills at Oxenhope, Haworth, Ebor Lane and near Oakworth which have been such an important feature of the local landscape • loss of green belt and open fields at Bridgehouses Mill, Haworth • loss of fields and open views opposite Haworth station • loss of countryside and open views near Damems 	

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>(Bronte caravan park)</p> <ul style="list-style-type: none"> • loss of open views through tree planting and lack of countryside management • installation of a wind turbine near Haworth • long-standing threats to green belt and open countryside by potentially large scale housing developments. <p>Guidelines for the Future</p> <p>It is essential that the landscape within the area known as Bronte Country (Areas designated A2, parts of B1/2 and C2) is given a very high level of protection to maintain it in good condition and for it to remain largely as it is or enhanced. It needs to remain recognisable as the landscape that has existed for the last 200 years so that visitors coming from near and far can see the landscape and built environment that is the basis for the area's unique fame and attraction.</p> <p>This means that:</p> <ul style="list-style-type: none"> • wind turbines need to be completely banned from the whole of Bronte Country, as well as the neighbouring moors of Calderdale • local farmers need to be supported to maintain their fields and pastures, farm buildings and dry stone walls, supported financially to remain sustainable • a generally open aspect is important and needs to be maintained throughout the area, requiring limitations on tree planting, essentially to specimen native trees rather than denser woodland • new housing and other developments must be 	<ul style="list-style-type: none"> • The SPD cannot introduce new policy, it can only provide guidance on how policy should be implemented. Recent changes in national planning policy mean that there are pressures for the development of on-shore wind turbines to help meet net-zero goals. The SPD identifies such development as a potential pressure on the landscape and the potential implications of such development. It indicates that wind turbines would create vertical intrusions on the skyline and reduce the remote qualities of the landscape character type. The guidance requires any such development to limit the

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>confined to existing built areas rather than extending onto green belt or open landscapes</p> <ul style="list-style-type: none"> • existing settlements need to remain separate from one another • maintenance of mill ponds, goyts, dry stone walls and footpaths needs to be improved and enhanced • buildings should be protected and conserved in conservation areas, particularly Haworth village, and sympathetic new uses found for surviving mill buildings • moorland should be subject to management limited essentially to reducing water run-off, enhancing wildlife habitats and maintaining footpaths. 	<p>intervisibility of such schemes which may affect the remote characteristics.</p> <ul style="list-style-type: none"> • The SPD is primarily about identifying the key characteristics of the landscape, the pressures for change and guidance on how to mitigate such changes and enhance the landscape where appropriate. Other projects and funding mechanisms for support farmers are available outside of this process. • The open character of these landscapes is already identified and the guidance specifically looks at the appropriateness of tree planting or limiting tree planting depending on the circumstances. • The location of new housing development is managed through allocations in the new Local Plan and individual planning applications which are controlled by local and national planning policy. The SPD provides guidance about how new developments can best fit into the landscape and design approaches which should be used. • The SPD identifies the key characteristics of the different landscapes within the District including how existing settlements are incorporated into the landscape. The guidance section for a number of the landscape character types already recognises the need to maintain the separation between settlements. • Maintenance of specific features, and conservation of buildings is already recognised in the guidance. It is

Comment ID	Respondent ID	Comment (Full text)	Council Response
			<p>also covered by other policy provisions in national planning policy and the local plan.</p> <ul style="list-style-type: none"> • Moorland management is essential to maintaining the unique habitat. The guidance provides suggestions about how this can be achieved, including rewetting of peatland etc. <p>Recommended change: None</p>
30574	7783	<p>LCT A: Moorland Plateau (e.g., Rombalds Moor) The document correctly identifies the presence of prehistoric rock carvings and the pressures of climate change.</p> <p>Peatland Restoration: The guidance suggests rewetting moorland for carbon sequestration. While we support this, changes to achieve this has the potential to impact paleoenvironmental remains (pollen, preserved wood) suspended in the peat.</p> <p>Recommendation: Guidance for LCT A must state that peatland restoration projects require archaeological assessment to ensure sensitive organic remains are not damaged by hydrological changes or mechanical interventions. Historic England have recently produced guidance on this process. Peatlands and the Historic Environment: Guidance for Carrying out Peat Restoration Historic England</p>	<p>The Guidance section for this LCT already includes a reference to the need to ‘balance the potential conflicting interests between moorland restoration and archaeology, avoiding restoration works that may disturb deeper soil layers and affect undiscovered/unexplored archaeological features.’ However, this point can be expanded to include reference to the need for archaeological assessments as part of peatland restoration projects. Consider including reference to the Historic England guidance.</p> <p>Recommended change: Include guidance on the need for archaeological assessment as part of peatland restoration projects.</p>
30591	7686	<p>We are pleased to see that the pressures from development have been identified as a ‘force for change’ in relation to the Moorland Landscape Character Type (LCT) and Moorland Fringe LCT:</p>	<p>Comment noted.</p> <p>Recommended change: None</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>“Future management and mitigation on the back of the HRA SPD due to increased residential development in the district – recreational pressures.” (Appendix C, Consultation Summary, September 2023)</p>	
30594	7686	<p>Due to the climate emergency and in order to deliver the net zero targets outlines in the WY Climate Action Plan, it is therefore important to consider linkages between separate landscape areas. As stated in the introductory chapter:</p> <p>“Landscape does not stop at administrative boundaries but continues seamlessly into surrounding districts” (Introduction & Methodology Chapter- LCA SPD, September 2023)</p> <p>As such, the LCA SPD should provide further detail on the implications of developing on or near peatland and blanket bog, to protect these habitats from negative impacts of development. We have concerns over the following statement included within Chapter 3:</p> <p>“In response to climate change there is an increase in pressure for renewable energy. The exposed character of the moorlands makes them favourable locations for wind turbines from a technical perspective. This would create vertical intrusions on the skyline and reduce the remote qualities of the LCT.” (Chapter 3-Landscape Types and Area Profiles-LCA SPD, September 2023)</p>	<p>The SPD cannot introduce new policy, it can only provide guidance on how policy should be implemented. Recent changes in national planning policy mean that there are pressures for the development of on-shore wind turbines to help meet net-zero goals. The SPD identifies such development as a potential pressure on the landscape and the potential implications of such development. It is acknowledged that such developments can have potential impacts on the blanket bog and peatland habitats and this would need to be sensitively managed. An additional guidance point could be added to ensure sufficient consideration is given to the peat and blanket bog habitats in relation to any potential renewable energy developments.</p> <p>Recommended change: Include additional guidance point in relation to blanket bog and peatland habitat and potential impacts from renewable energy developments.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>Whilst YWT supports the need for renewable energy and understands how renewable energy sources such as on-shore wind farms will be required in order to meet the Net Zero target by 2038, as stated in the WY Climate action plan, we must stress the importance of where these on-shore wind farms are located. Given the presence of irreplaceable habitats within the region, it will be important that any areas of peatland, or land designated within the South Pennine Moor SAC/SPA, are not developed upon as such. We would be happy to advise further on this matter, as YWT have in-house expertise on peatland restoration and are actively restoring peat and blanket bog habitat within Yorkshire⁸ and its surrounding areas.</p> <p><i>(⁸ “We have brought 42,800 ha of blanket bog (45% of the estimated total for our operational area) into restoration management.” Found at: Resources Yorkshire Peat Partnership)</i></p>	
30609	7786	<p>Landscape Character Type A: Moorland Plateau: Section: Tourism, Recreation and Access Pressure: Amend text in relation to A1 so it reads (amendments in brackets): ‘Most of the moorland is accessible and increased (pressure from commercial dog walking and recreation) is likely to be concentrated around key sites. Across the LCT recreational pressures have the potential to affect habitats through erosion, changing the character of the plateaux’</p>	<p>It is recognised that dog walking and the presence of dogs on the moors can have an impact on the habitat. This is a noted ‘recreation impact pathway’ in the South Pennine Moors Planning Framework SPD and associated Habitat Regulation Assessments (HRAs) of the adopted Development Plan (the Core Strategy). Specific reference to commercial dog walking can be included within the pressure and forces for change section in relation to Tourism, Recreation and Access Pressure.</p> <p>Recommended change: Update the bullet point relating to Tourism, Recreation and Access Pressure to read:</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
			“Most of the moorland is accessible and increased pressure from recreation (including the potential for commercial dog walking) is likely...”.
30610	7786	Landscape Character Type A: Moorland Plateau: Section: Tourism, Recreation and Access Pressure: Amend text in relation to A1 so it reads (amendments in brackets): ‘A1: Pressure from off-road mountain biking (and vehicles) has impacted semi-natural habitat on the northern slopes.’	The pressures and forces for change section highlights those key issues which are having an impact or likely to have an impact in the future. Mountain Biking has been highlighted as a key issue within this landscape character area. Conversely, reports of the use of other vehicles/off-road vehicles has not been specifically highlighted as a key issue and has therefore not been included under this point. In this instance no change to the wording is proposed. Recommended change: None
30611	7786	Section: Tourism, Recreation and Access Pressure: Amend text in relation to A1 so it reads (amendments in brackets): Pollution, Littering and Anti-social Behaviour: Amend text so reads: ‘Increased development and visitor numbers increases the risk in relation to antisocial behaviour, (fly tipping) and littering.’	It is acknowledged that fly tipping is becoming an increasing problem in several areas across the district. Reference will be made under the Pollution, Littering and Anti-social Behaviour section. Recommended change: Update the bullet point relating to Pollution, Littering and Anti-social Behaviour to read: ‘Increased development and visitor numbers increases the risk in relation to littering and anti-social behaviour (including fly tipping).’
30612	7786	Guidance section (page 44): Amend bullet 5 so reads (additional text in brackets): ‘Enhance areas of bog and carry out peatland restoration. Particularly consider opportunities to remove conifer plantations and replace with bog restoration/ (broadleaved woodland.) The aesthetic impact of these projects should be considered in their	In this landscape character type, the removal of conifer plantations is part of the restoration of the blanket bog and peatland habitat. Planting of broadleaved woodland, although preferable to conifer trees, would not be reflective of the open moorland character. The guidance already indicates that woodland should be concentrated

Comment ID	Respondent ID	Comment (Full text)	Council Response
		implementation. Consider species which may be more drought tolerant and therefore resilient to climate change.'	in the cloughs and becks and should be avoided from the skyline. As such the wording should not be amended. Recommended change: None
30613	7786	Guidance section (page 44): Amend (reorder) bullet 8 to reflect prioritisation of rewetting over firebreaks: 'Increased wildfire risk on moorlands due to climate change can be managed through (rewetting strategies, education and peatland firebreak design).'	The list is not set out in a priority order. However, the potential measures can be re-ordered. Recommended change: Re-order the measures which can be used to help reduce fire risk. Bullet point to read: "Increased wildfire risk on moorlands due to climate change can be managed through rewetting strategies, education and peatland fire break design."
30614	7786	Guidance section: (page 44) Amend bullet 13 to remove reference to South Pennine Park. Suggested text as follows: 'Work with relevant partnerships and interested groups to manage visitor pressure on rights of way and open access land along the moorland'	The SPD was prepared in 2022/23 when the South Pennine Park was still in existence. It is acknowledged that the organisation has now been disbanded and therefore references should be removed and the relevant text updated. Recommended change: Update bullet point to remove reference to South Pennine Park and reword to read: "Work with relevant partnerships and interested groups to manage visitor pressure on rights of way and open access land along the moorland fringes." Make other consequential amendments through the document in relation to the South Pennine Park. Make reference to the disbandment of the organisation but acknowledgement of their input into the preparation of the SPD.

Chapter 3: LCA Type B: Moorland Fringe

Comment ID	Respondent ID	Comment (Full text)	Council Response
30564	7781	A more nuanced position should be adopted with regard to development impact of development on Baildon Moor's fringe on the Saltaire WHS. For different sites have a relative different impact and it is a flawed approach to suggest that all such sites have a similar impact. Instead, a more appropriate approach would be to suggest that for any development to come forward in that location a case specific heritage and townscape assessment should be undertaken to assess impacts. Eg the key views from a heritage townscape perspective relate to the views from Victoria Road in Saltaire. The attached note covers wider matters but demonstrates at page 5 & 6 the relative different impacts of different sites on townscape and importance of a site-specific assessment being undertaken.	<p>The SPD offers high-level observations in relation to the potential development pressures on the edge of Baildon Moor and their potential impact on the Saltaire World Heritage Site (WHS). The Guidance is equally high-level in that it looks to ensure that the visual interrelationship between the Saltaire WHS and the Baildon moorland fringe is maintained. However, the wording is already sufficiently flexible to allow for site specific evidence to be produced as part of any planning application. Indeed, a site-specific heritage assessment would be required for any development potentially affecting the WHS. The SPD does not restrict this approach, rather it highlights the importance of the WHS and the need to maintain its setting within the wider landscape. This would be partly achieved through reference to the Saltaire WHS Management Plan and associated 'views' work.</p> <p>Recommended change: None</p>
30567	750	Under 'Guidance' add "Seek opportunities to enhance footpath and cycle links throughout the LCA.	<p>There is an existing bullet point relating to managing visitor pressure on rights of way and open access land which could be amended to make reference to seeking to enhance footpath and cycle links.</p> <p>Recommended change: Amend bullet point 7 to read: "Work with relevant partnerships and interested groups to manage visitor pressure on rights of way and open access land along the moorland fringes and seek opportunities to enhance footpath and cycle links."</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
30572	7783	<p>General Principles: Preservation and Truncation A consistent theme throughout the SPD is the pressure for development on settlement fringes (e.g., LCT H and LCT B).</p> <p>Comment: The SPD could articulate why greenfield/pastoral land is archaeologically sensitive. Areas of permanent pasture and moorland that have not undergone modern ploughing or development are likely to have high archaeological potential because the subsurface stratigraphy has not been truncated.</p> <p>Recommendation: We suggest adding a general principle to Chapter 3 stating: "Undeveloped areas, particularly permanent pasture and moorland, may contain significant subsurface archaeological remains that are well-preserved due to a lack of modern disturbance or truncation."</p>	<p>Within the Overview paragraph for LCT B additional wording will be added to acknowledge the potential for archaeological remains within certain parts of this landscape type.</p> <p>Recommended change: Within the LCT overview paragraph include the following wording: "Undeveloped areas, particularly permanent pasture and moorland, may contain significant subsurface archaeological remains that are well-preserved due to a lack of modern disturbance or truncation."</p>
30592	7686	<p>We are pleased to see that the pressures from development have been identified as a 'force for change' in relation to the Moorland Landscape Character Type (LCT) and Moorland Fringe LCT: "Future management and mitigation on the back of the HRA SPD due to increased residential development in the district – recreational pressures." (Appendix C, Consultation Summary, September 2023)</p>	<p>Comment noted.</p> <p>Recommended change: None</p>
30595	7686	<p>Due to the climate emergency and in order to deliver the net zero targets outlines in the WY Climate Action Plan, it is therefore important to consider linkages between separate landscape areas. As stated in the introductory chapter:</p>	<p>The SPD cannot introduce new policy, it can only provide guidance on how policy should be implemented. Recent changes in national planning policy mean that there are pressures for the development of on-shore wind turbines to help meet net-zero goals. The SPD identifies such</p>

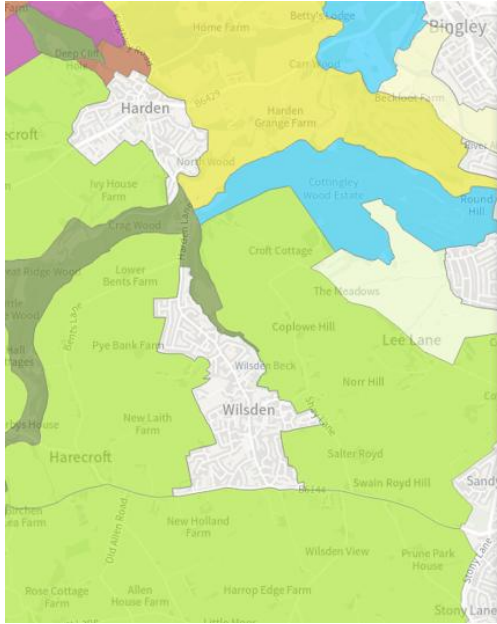
Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>“Landscape does not stop at administrative boundaries but continues seamlessly into surrounding districts” (Introduction & Methodology Chapter- LCA SPD, September 2023)</p> <p>As such, the LCA SPD should provide further detail on the implications of developing on or near peatland and blanket bog, to protect these habitats from negative impacts of development. We have concerns over the following statement included within Chapter 3:</p> <p>“In response to climate change there is an increase in pressure for renewable energy. The exposed character of the moorlands makes them favourable locations for wind turbines from a technical perspective. This would create vertical intrusions on the skyline and reduce the remote qualities of the LCT.” (Chapter 3-Landscape Types and Area Profiles-LCA SPD, September 2023)</p> <p>Whilst YWT supports the need for renewable energy and understands how renewable energy sources such as on-shore wind farms will be required in order to meet the Net Zero target by 2038, as stated in the WY Climate action plan, we must stress the importance of where these on-shore wind farms are located. Given the presence of irreplaceable habitats within the region, it will be important that any areas of peatland, or land designated within the South Pennine Moor SAC/SPA, are not developed upon as such. We would be happy to</p>	<p>development as a potential pressure on the landscape and the potential implications of such development. It is acknowledged that such developments can have potential impacts on the blanket bog and peatland habitats and this would need to be sensitively managed. An additional guidance point could be added to ensure sufficient consideration is given to the peat and blanket bog habitats in relation to any potential renewable energy developments.</p> <p>Recommended change: Include additional guidance point in relation to blanket bog and peatland habitat and potential impacts from renewable energy developments.</p>

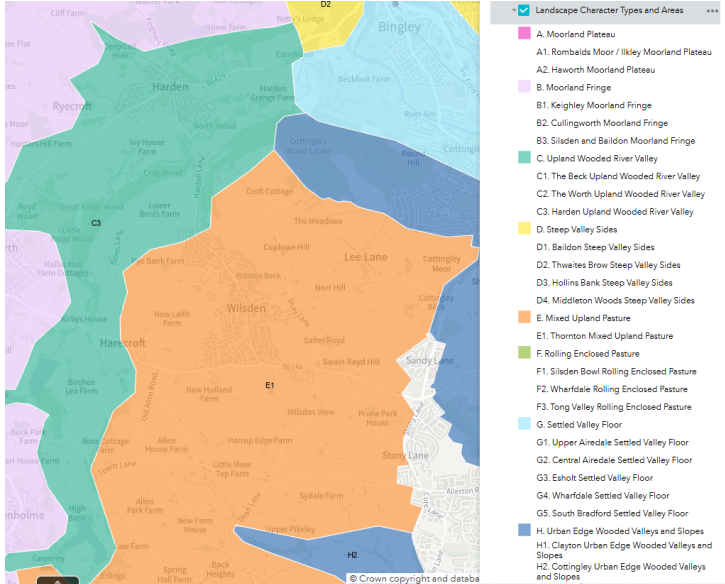
Comment ID	Respondent ID	Comment (Full text)	Council Response
		advise further on this matter, as YWT have in-house expertise on peatland restoration and are actively restoring peat and blanket bog habitat within Yorkshire8 and its surrounding areas.	

Chapter 3: LCA Type C: Upland Wooded Valleys

Comment ID	Respondent ID	Comment (Full text)	Council Response
30575	7783	<p>LCT C: Upland Wooded Valleys (e.g., North Beck) The assessment highlights medieval "assarts" (piecemeal enclosures) as a key characteristic.</p> <p>Boundary Morphology: The value of these features lies in their irregular shape, not just the drystone material.</p> <p>Recommendation: The guidance could explicitly encourage the retention of the morphology (shape and layout) of historic field boundaries, not just the maintenance of the walls themselves, to preserve the legibility of the medieval landscape.</p>	<p>Agree that the morphology of the boundaries is also an important consideration. The guidance will be amended to make specific reference to seeking to retain the shape and layout of the boundaries.</p> <p>Recommended change: Update the wording of the first bullet point in relation to field patterns, making reference to the boundary morphology and importance of retaining the shape and layout of historic field boundaries.</p>
30577	7783	<p>LCT C (Upland Wooded Valleys) & LCT G (Settled Valley Floors) These areas are defined by their "industrial heritage," including mills, weirs, and goits.</p> <p>Industrial Archaeology vs. Built Heritage: While the SPD highlights the value of standing mill buildings, it must also recognise them as complex archaeological sites. The standing structures often mask earlier technological phases, power systems (wheel pits, culverts), and worker housing foundations below ground.</p> <p>Recommendation: Guidance should state that "Conversion or redevelopment of industrial heritage assets requires appropriate historic building recording (Historic England Level 2/3) and archaeological assessment of below-ground power and water</p>	<p>It is acknowledged that the industrial heritage within this landscape character type makes an important contribution and should be appropriately conserved and enhanced. An additional guidance bullet point should be included to make reference to both built heritage and archaeological assets and the need to assess and record them.</p> <p>Recommended change: Include an additional bullet point which reads: "Ensure that any conversion or redevelopment of industrial heritage adequately assesses and records the historic environment, including any below-ground power and water management systems, which are integral to understanding a site's technological history."</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		management systems, which are integral to understanding the site’s technological history.”	
30588	7782	<p>It is proposed that the boundary between C3 and E1 is changed so the southern boundary of C3 within the Wilsden Parish Council area is the B6144. This was used in 2008 LCA as the boundary between Wilsden and Thornton & Queensbury landscape areas. This section included no reference to the Wilsden Beck wooded valley which was erroneously not included in C3. The fact that landscape character would be weakened by ribbon development between Harden and Wilsden was significantly diluted in the 2025 assessment when compared to the 2008 LCA.</p> <p>Fig 3.67 required changes to include newly designated as Open Access land.</p>	<p>The new Landscape Character Assessment has been prepared in line with the Natural England guidance. The new assessment explains at paragraph 2.10 that: “The update of the landscape classification for Bradford is based on a review of the 2008 approach, boundaries and new information on landscape change. The 2008 Landscape Assessment subdivided the district into ten LCAs. Within each of the LCAs there were several different LCTs. The 2022 approach has reviewed and rationalised the classification and identification of generic LCTs and then subdivided these into geographically distinct LCAs.”</p> <p>With specific reference to the area around Wilsden – in the 2008 assessment the main landscape character type which surrounds the village is mixed upland pasture, with a small amount of wooded valley to the north. This is shown on the map below. There is no difference between the character type to the north or south of the B6144.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
			<p>Landscape Character Types from the 2008 Landscape Character Assessment:</p>  <p>In the 2025 (2023) Landscape Character Assessment the Landscape Character Type surrounding Wilsden is essentially the same – being made up of mixed upland pasture. The Landscape Character Type to the south of Harden is still identified as Upland Wooded River Valley. There is still a distinction made between the two landscape character types which should not impact on the type of development considered appropriate in this area.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
			<p>Landscape Character Types from the 2023 Landscape Character Assessment:</p>  <p>However, it is recognised that the naming of the Landscape Character Area (LCA) E1 is perhaps not fully reflective of the areas it covers. As such it is recommended that LCA E1 is renamed as: Thornton, Queensbury and Wilsden Mixed Upland Pasture.</p> <p>It should be noted that the boundaries between the different landscape character types and areas are fluid and not definitive as the landscape can change subtly. This will be emphasised in the introductory text.</p> <p>In relation to additional access land which has been designated – it is unclear where this is located. Fig 3.67</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
			<p>already identifies designated open access land in orange. The fig. will be updated where necessary.</p> <p>Recommended change: No change to the landscape character type or area boundaries. The 'Classification' section in Chapter 2 should be amended to emphasise that the boundaries of the LCTs and LCAs are not definitive, but represent a fluid transitional point between the different types/areas.</p> <p>Rename the Landscape Character Area E1 to: Thornton, Queensbury and Wilsden Mixed Upland Pasture.</p>

Chapter 3: LCA Type E: Mixed Upland Pasture

Comment ID	Respondent ID	Comment (Full text)	Council Response
30563	611	<p>Firstly, history and heritage of the village (Thornton) is remarkable and equal to Haworth and Saltaire. Yet we are a neglected corner with cracked and broken paving stones, empty run down buildings and litter/fly-tipping a blight that deters visitors. I read the document's summary of the village and welcome its recognition of Thornton as valuable. But when will we receive the same care that is given to Haworth and Saltaire? Missed opportunities!</p> <p>The landscape is also recognised in the document, thankfully. A walk along the Sustrans railway path reveals a landscape rich in biodiversity and reminders of our past, industrial and preindustrial (ruined crofts that date back to the Middle Ages). Broadly speaking, I welcome the report and its summation of this area. I hope that action follows words and the area is given as much care as Bradford's other gems. Please, take robust action to deal with empty, decaying and dangerous buildings in the Conservation Area.</p>	<p>The Landscape Character Assessment provides a review of the different landscape character types and areas within the District. It sets out the key characteristics of each area, identifying what distinguishes them from other areas, offers high-level identification of the pressures and forces for change in the landscape, and offers guidance on how the landscape can manage those pressures. It does not set out any specific projects or actions for each area. The main aim of the document is to help guide and steer the consideration of new developments within the landscape and support projects by identifying key issues.</p> <p>The representors comments are noted.</p> <p>Recommended change: None.</p>
30589	7782	<p>It is proposed that the boundary between E1 and C3 is changed so the northern boundary of E1 within the Wilsden Parish Council area is the B6144. This was used in 2008 LCA as the boundary between Wilsden and Thornton and Queensbury landscape areas.</p>	<p>See response to comment 30588 above.</p> <p>Recommended change: No change to the landscape character type or area boundaries. The 'Classification' section in Chapter 2 should be amended to emphasise that the boundaries of the LCTs and LCAs are not definitive, but represent a fluid transitional point between the different types/areas.</p> <p>Rename the Landscape Character Area E1 to: Thornton, Queensbury and Wilsden Mixed Upland Pasture.</p>

Chapter 3: LCA Type F: Rolling Enclosed Pasture

Comment ID	Respondent ID	Comment (Full text)	Council Response
30576	7783	<p>LCT F: Rolling Enclosed Pasture (e.g., Tong Valley) We note the specific reference to the Battle of Adwalton Moor (1643) in LCA F3.</p> <p>Conflict Archaeology: Battlefields are uniquely sensitive to unmonitored earthworks, which can disturb scatter patterns of shot and other conflict debris essential for understanding the battle.</p> <p>Recommendation: Specific guidance for LCA F3 could state that any development or landscaping within the Registered Battlefield area requires specialist archaeological evaluation (metal detecting survey) prior to determination. Battlefield sites in England are material considerations in the planning process and are designated by Historic England and put onto the Register of Historic Battlefields under powers conferred under the Historic Buildings and Ancient Monuments Act, 1983 (as amended).</p>	<p>The purpose of the SPD is to provide additional guidance on landscape matters and not repeat existing policy or planning requirements. The Adwalton Moor battlefield is recognised as a heritage asset at risk within the document. As such consideration of the heritage asset (including archaeological asset) should be taken into account as part of any proposed development which may affect the site.</p> <p>An additional bullet point could be inserted to make specific reference to the battlefield in relation to archaeological assets.</p> <p>Recommended change: Include an additional bullet point under the guidance section which reads: “In LCA F3 specific consideration should be given to the archaeological importance of the Adwalton Moor battlefield, with specialist evaluation being undertaken as part of any development or landscaping proposals.”</p>
30602	215	<p>Whilst Hallam Land generally supports the baseline character assessment of the Tong Valley included within the Draft SPD, there are significant concerns regarding the conclusion that this area may offer limited potential for future development in landscape terms. As demonstrated by the Council’s own assessment, parts of the Tong Valley, including the application site and draft allocation, are less sensitive to change and can be developed without undue significant adverse impact on landscape character whilst helping to deliver landscape</p>	<p>The level of guidance provided in the SPD is relatively broad and, on the whole, is not site specific in relation to potential future development opportunities. The final bullet point in the guidance section for Landscape Character Type F: Rolling Enclosed Pasture indicates that consideration “<i>should be given to the historic settlements with relatively intact settlement patterns, and the sensitivities of the LCAs, any potential development would need careful consideration, and there may be limited potential for future development.</i>”</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		objectives, especially when implemented alongside robust landscape frameworks and on-site mitigation. It is therefore recommended that this be given specific reference within any adopted SPD in line with identified development and regeneration needs.	<p>This point covers all the LCAs under this character type and would only apply where it was demonstrated that the proposed development would significantly affect the relevant historic settlement pattern.</p> <p>At the planning application stage, a more detailed LVIA would be required to fully understand the potential impact of the development on the landscape. It is not the place of the Landscape Character Assessment to include site specific development details. However, it should be noted that as part of the preparation of the new Local Plan, the Council is also carrying out Landscape Sensitivity Assessments as part of the allocation process, and these will provide more detail of the sensitivity of proposed development sites within the landscapes in which they are situated. This work will be published alongside the new Local Plan (Regulation 19 Publication version) as part of the evidence base.</p> <p>It is considered that the Landscape Character Assessment provides broad scale guidance which is sufficiently flexible to allow for development to take place which is sensitive to the characteristics of the landscape in which it is situated.</p> <p>Recommended change: None.</p>
30603	215	Overall Hallam Land supports the baseline character assessment included within the Draft Landscape Character Assessment SPD which assesses the area of Westgate Hill/Holme Wood South as comprising enclosed pasture in line with the current, adopted, Landscape SPD, and the assessment of landscape character undertaken within the LVIA submitted in	<p>Comment noted.</p> <p>Recommended change: None.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		relation to the proposed development at Westgate Hill, located at the edge of the Tong Valley LCA.	
30604	215	<p>It is right to recognise that some parts of the LCA will be less sensitive to change from development than others, especially when developed alongside robust landscape frameworks to mitigate resulting impacts, and this should be reflected within the SPD. This has indeed been the case within the current adopted SPD, paragraph 6.3.3, which explicitly recognises the relative development potential of Westgate Hill/Holme Wood South where development would be best accommodated with least impact upon the identified qualities of most value. The adopted SPD describes this as follows:</p> <p>"With moderate strength of character, high historic continuity and a prominent and enclosed nature it can be seen that [the Tong Valley] landscape is sensitive to change. Section 5.0 of this chapter also concludes that Tong Valley has limited potential for further development relative to other character areas in the Bradford District".</p> <p>However, should further development in Tong Valley be required then sites on the edge of the Holmewood Estate or Westgate Hill areas would be the most appropriate. Though development of these sites would have the cumulative effect of putting pressure on the integrity of the unit of countryside, such sites would accommodate modern estate developments with far less detrimental impact than if in the open countryside.</p>	Comments noted with further details provided below.

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>Such an approach would more appropriately focus new development within the LCA to the Westgate Hill/Holme Wood draft allocation in line with its relative sensitivity and consistent with the Council’s own assessment of this site in landscape terms as part of the evidence base for the Local Plan. This would align with this location’s longstanding identification as an identified regeneration area to deliver new housing and employment land uses. The Draft SPD description which identifies under the heading of ‘Pressures for change: Development’ appropriately describes that ‘surrounding settlements are on higher ground’ and goes on to set out that ‘development would clearly be visible from within Tong Valley, impacting on the rural character of the valley’. It is unclear whether the intent of this paragraph is to direct development away from the existing settlement areas, which would appear to be contrary to the guidance of the current SPD, as set out above.</p> <p>Hallam Land agrees that the landscape and visual effects of any future development within this LCA should seek to minimise the influence upon the lower, more intact, areas of the Tong Valley landscape. However, as settlement is already present at the more elevated fringe areas, the development potential described within the current (2008) SPD is considered to be appropriate. Any such development should be supported by a well-considered landscape framework and masterplan which demonstrates a strong understanding of the receiving landscape qualities and character, and consideration of the particulars of each proposal.</p>	<p>In relation to the bullet point under the Pressures and Forces for Change section – this point is emphasising that in this location development on the higher ground would be visible and may have an impact on the rural character of the valley. It is not necessarily looking to direct development away from this area, but pointing out that development in this location is likely to have an impact and therefore would need to be managed carefully and sensitively.</p> <p>As stated in the response to comment 30602 above, the guidance provided is high-level and broad, applying to all the LCAs within this Character Type. It is proposed to provide some additional detail in relation to development within LCT: Rolling Enclosed Pasture</p> <p>Recommended change: Update the (original) 6th bullet point to recognise that in this LCT, there may be areas adjacent to existing development which can accommodate development, particularly in pockets where the topography is less intricate.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
30605	215	<p>The more elevated, fringes of the LCA where existing settlement is already a characteristic, should therefore be prioritised for development over other, more sensitive, lower, parts of the Tong Valley to enable the delivery of strategic development and regeneration priorities whilst protecting those areas of the Tong Valley which are more sensitive to change. It is therefore recommended that similar wording to that included within the current adopted SPD be incorporated in any adopted version of the SPD in recognition of the identified need for future development within the Tong Valley in line with identified (both adopted and emerging) strategic development and regeneration needs.</p>	<p>The guidance provided is high-level and broad, applying to all the LCAs within this Character Type. It is proposed to provide some additional detail in relation to development within LCT: Rolling Enclosed Pasture.</p> <p>Recommended change: Update the (original) 6th bullet point to recognise that in this LCT, there may be areas adjacent to existing development which can accommodate development, particularly in pockets where the topography is less intricate.</p>

Chapter 3: LCA Type G: Settled Valley Floor

Comment ID	Respondent ID	Comment (Full text)	Council Response
30578	7783	<p>LCT C (Upland Wooded Valleys) & LCT G (Settled Valley Floors)</p> <p>These areas are defined by their "industrial heritage," including mills, weirs, and goits.</p> <p>Industrial Archaeology vs. Built Heritage: While the SPD highlights the value of standing mill buildings, it must also recognise them as complex archaeological sites. The standing structures often mask earlier technological phases, power systems (wheel pits, culverts), and worker housing foundations below ground.</p> <p>Recommendation: Guidance should state that "Conversion or redevelopment of industrial heritage assets requires appropriate historic building recording (Historic England Level 2/3) and archaeological assessment of below-ground power and water management systems, which are integral to understanding the site's technological history."</p>	<p>It is acknowledged that the industrial heritage within this landscape character type makes an important contribution and should be appropriately conserved and enhanced. An additional guidance bullet point should be included to make reference to both built heritage and archaeological assets and the need to assess and record them.</p> <p>Recommended change: Include an additional bullet point which reads: "Ensure that any conversion or redevelopment of industrial heritage adequately assesses and records the historic environment, including any below-ground power and water management systems, which are integral to understanding the site's technological history."</p>
30579	7783	<p>LCT G: Settled Valley Floor (e.g., Airedale)</p> <p>The document notes the presence of "superficial deposits of alluvium" and "washlands".</p> <p>Geoarchaeology: River valleys are high-potential zones for prehistoric archaeology, which is often masked by deep deposits of alluvium (flood silts). Standard shallow trenching often fails to identify these deeply buried horizons.</p>	<p>Additional reference could be made to the potential for geoarchaeology within these river valley landscapes. An additional guidance point should be included.</p> <p>Recommended change: Include an additional bullet point under the Guidance section for this Landscape Character Type which reads: "Ensure that any development within the river valleys adequately identifies, preserves and/or adequately records any geoarchaeological deposits."</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		Recommendation: Guidance for LCT G could highlight the potential for geoarchaeological deposits. Developers should be aware that deep evaluation techniques may be required in floodplain areas.	

Chapter 3: LCA Type H: Urban Edge Wooded Valley

Comment ID	Respondent ID	Comment (Full text)	Council Response
30573	7783	<p>General Principles: Preservation and Truncation A consistent theme throughout the SPD is the pressure for development on settlement fringes (e.g., LCT H and LCT B).</p> <p>Comment: The SPD could articulate why greenfield/pastoral land is archaeologically sensitive. Areas of permanent pasture and moorland that have not undergone modern ploughing or development are likely to have high archaeological potential because the subsurface stratigraphy has not been truncated.</p> <p>Recommendation: We suggest adding a general principle to Chapter 3 stating: "Undeveloped areas, particularly permanent pasture and moorland, may contain significant subsurface archaeological remains that are well-preserved due to a lack of modern disturbance or truncation."</p>	<p>Within the Overview paragraph for LCT H additional wording will be added to acknowledge the potential for archaeological remains within certain parts of this landscape type.</p> <p>Recommended change: Within the LCT overview paragraph include the following wording: "Undeveloped areas, particularly permanent pasture and moorland, may contain significant subsurface archaeological remains that are well-preserved due to a lack of modern disturbance or truncation."</p>

Appendix C: Consultation Summary

Comment ID	Respondent ID	Comment (Full text)	Council Response
30597	7686	<p>Dark Skies</p> <p>In the Appendix C, we note that Figure C.1, indicates landscape characteristics of moorland and moorland fringes, within this diagram there is a note mentioning an area defined as Dark Skies. We would recommend that this Draft SPD further assesses this characteristic, although not a protected feature within the planning system, protecting dark skies and encouraging nature friendly design features through the planning system have a multitude of benefits for both nature and human life¹².</p> <p>Given the climate emergency in West Yorkshire, light pollution is a contributing factor. Not only due to the increase in carbon emissions produced by wasted light, often a result of poor design and building management, but also have negative financial implications for building owners and local authorities. We would encourage that the LPA considers how encouraging dark sky friendly communities, could have beneficial impacts on both wildlife and human life; enabling both to flourish within the district.</p>	<p>The SPD already includes an assessment of ‘Night Blight’. For each Landscape Character Type/Area, consideration is given to dark skies under the ‘Views and Perceptual Qualities’ section. The CPRE’s Night Blight map has been used to understand the severity of light pollution in each area. In a number of Landscape Character Areas, the development potential to affect dark night skies has been identified as a consideration. It is considered that there is sufficient reference to protecting dark skies.</p> <p>Recommended change: None.</p>

Table 3.2: Representations and Responses to the LCA Habitat Regulations Assessment (HRA) Screening Report

Comment ID	Respondent ID	Comment (Full text)	Council Response
30590	7686	<p>Given the presence of protected landscapes in the district, we are pleased to see that an HRA screening has been undertaken by Bradford Metropolitan Borough Council (BMBC). We are satisfied with the conclusion of Natural England (NE) that no significant negative effects are expected as a result of this LCA SPD consultation but that should anything change, the screening may need to be re-evaluated⁴.</p> <p><i>(⁴ Pg, 5, HRA Screening, Natural England Comments: “if when we are consulted on the Landscape Character Assessment SPD and find it contains anything which significantly affects its impact on the natural environment, then we will raise that in our response and may recommend rescreening.” 2025)</i></p>	<p>Comment noted. The Council we undertake a rescreening exercise should there be a significant change to the SPD which would likely to result in potential impacts to the SPA/SAC.</p> <p>Recommended change: None.</p>
30596	7686	<p>Urban Fringes</p> <p>As the introductory chapter of the LCA SPD explains, over two thirds of the District is rural, but 80%⁹ the population resides in urban areas; therefore, it is important that the connection between the urban and rural areas is also considered. In 2024, YWT published our State of Yorkshire’s Nature Report (SOYN¹⁰). The report describes how the urban portion of Yorkshire’s landscape is 10% of the total land area, however, is proportionally the most densely populated area of the region, meaning that it is in urban areas, where people are most likely to encounter and engage with wildlife. Nature is present within urban areas, and we are pleased to see reference to this in the HRA Screening report: “One of the key aims of the policy is to consider the opportunity to contribute towards positive restoration of landscapes, particularly in the urban fringe, achieve</p>	<p>Comment noted.</p> <p>Recommended change: None.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>greater habitat connectivity, enhancement of characteristic semi-natural vegetation and accessible natural greenspace.”</p> <p>(Habitats Regulations Assessment (HRA) Initial Screening Statement, October 2025)</p> <p>⁽⁹⁾ pg. 17. Bradford District Local Plan: “Approximately 66% of the District is rural in nature and home to 20% of the District’s population”</p> <p>¹⁰ State of Yorkshire’s Nature Report, Yorkshire Wildlife Trust. 2024)</p> <p>Given how densely populated urban areas of Bradford Metropolitan Borough (BMB) are, we are pleased to see that urban fringe landscape conditions have been given an appropriate weighting within this Draft LCA SPD. The Wildlife Trusts (TWT) produced a report in collaboration with Leeds Beckett University in 2019, Social Return on Investment analysis of the health and wellbeing impacts of Wildlife Trust programmes. In paragraph 96, the report published data evidenced findings recognising that access to a network of high-quality open spaces can deliver “wider benefits for nature and efforts to address climate change”¹¹. If designed and managed well, natural areas can be incorporated into open spaces intended for sports. Furthermore, including nature rich areas within the accessible network high-quality open spaces is good for mental as well as physical health.</p> <p>⁽¹¹⁾ <i>Social Return on Investment analysis of the health and wellbeing impacts of Wildlife Trust programmes</i>, The Wildlife Trusts, Leeds, 2019)</p>	

3.1 The following representations were received after the formal closing date for the consultation (12th December 2025). It is considered that these comments should be reported and that a response to them should be provided. However, it is recognised that in the interests of fairness the weight attached to these comments may be less than those received on time.

Table 3.3: Late Representations

Comment ID	Respondent ID	Comment (Full text)	Council Response
	5464	<p>Section: Chapters 1&2: Introduction and Methodology</p> <p>Addingham Civic Society (ACS) agrees the overall approach but feels the nature of Addingham is understated. The LCA underplays the distinctive character, high quality of the landscape surrounding the village, with extensive views to and from the fells of the Yorkshire Dales National Park and Nidderdale National Landscape and access and recreational links with The Dales Highway as well as The Dales Highway passing through the parish.</p> <p>Also the Addingham Neighbourhood Development Plan (ANDP) argues that the key landscape features of Area 21 are a closer fit for the whole of Addingham parish, rather than those of the South Pennines Character Area 36.</p> <p>The three largest character areas (B3, F2 and G4), covering Addingham parish are too broad brush. Small scale maps make it difficult to see where the character area boundaries fall. Either require separate sub-areas for Addingham or interactive maps allowing boundaries to be accurately located?</p>	<p>The Landscape Character Assessment has been prepared at the District scale and provides a broad overview of the different landscape character types and areas which can be identified within the District. More Localised Assessments could be undertaken as part of the preparation or updating of a Neighbourhood Plan.</p> <p>The boundaries between different Landscape Character Types/Areas are not definitive, but rather offer a fluid transitional point between the different types/areas.</p> <p>Once the new SPD is adopted a new online, interactive map will be prepared so that users of the document can understand the context of the different character types and areas at a more localised scale.</p> <p>Recommended change: The ‘Classification’ section in Chapter 2 should be amended to emphasise that the boundaries of the LCTs and LCAs are not definitive, but represent a fluid transitional point between the different types/areas.</p> <p>Prepare and publish an interactive map on the Council’s website of the Landscape Character Areas and other associated datasets.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
	5464	<p>Section: Chapter 3: LCA Type: B – Moorland Fringe: B3 Silsden and Baildon Moorland Fringe</p> <p>Section B3 should be renamed to make it clear that this character area extends into Wharfedale and includes Addingham Moorside - ‘Addingham, Silsden & Baildon Moorland Fringe’. Or alternatively be considered a separate sub-area “Addingham Moorside”.</p> <p>There is a very distinct character change and “feel” between the Aire and Wharfe valleys. The former reflects the character of the Southern Pennines and the latter, the Northern Pennines. This is readily apparent from views from the “Moorland Fringe” above Addingham, north eastwards to the boundary of the area.</p> <p>The “key Characteristics & Landscape Character Section” (pp 67), for this character area underplays the special character on the north-eastern fringes of Rombalds Moor. These are detailed in the attached Supplementary Document.</p> <p>“Threats & Guidance Section” (pp77), - broadly supportive.</p>	<p>The naming of the new landscape character areas was carefully considered to best reflect the locations that they represent. However, in this instance it is considered that it may be appropriate to rename this area as suggested to ‘Addingham, Silsden & Baildon Moorland Fringe.</p> <p>This area is similar to the area defined in the 2008 Landscape Character Assessment SPD. As a moorland fringe area - it is located between two different moorland areas in Airedale and Wharfedale – this area consists of a transitional landscape.</p> <p>(See separate response on the Key Characteristics below).</p> <p>Recommended change: Amend the name of Landscape Character Area B3 to Addingham, Silsden & Baildon Moorland Fringe.</p>
	5464	<p>Section: Chapter 3: LCA Type: B – Moorland Fringe: B3 Silsden and Baildon Moorland Fringe</p> <p>The “key Characteristics & Landscape Character Section” (pp 67), for this character area underplay the special character on the north-eastern fringes of Rombalds Moor and include:</p>	<p>The key characteristics section aims to provide a general and broad overview of those elements which are important in the specific landscape. However, it only makes limited reference to specifically named elements. Some of the issues suggested by the respondent are essentially already covered, albeit in a broader context. Some of these more specific details would be better</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>1. the distinctive features of Addingham Moorside settlement patterns with listed 17th Century farmhouses, barns and wool workshops along Moorside Lane, with linear holdings and later enclosures of intake land on the south side of Moorside Lane</p> <p>2. the dramatic scarp slope of Addingham Moorside - with craggy outcrops and millstone grit quarrying (mill stones are still visible)</p> <p>3. extensive views to and from, not just Nidderdale National Landscape, but also to the fells of the Upper Wharfe Valley and Yorkshire Dales National Park (YDNP), including the distinctive landmark of Beamsley Beacon</p> <p>4. the extensive and well used footpath network linking to the YDNP including the Dales Highway Long Distance Path.</p>	<p>examined as part of a more localised landscape assessment – perhaps as part of a neighbourhood plan (or review of such a plan). However, some of the suggested additions could be included in the LCA.</p> <p>Recommended change: Include references to the following issues under the appropriate bullet points:</p> <ul style="list-style-type: none"> • Dramatic scarp slope, craggy outcrops and millstone grit quarrying • Make specific reference to the National Landscape and National Park in relation to long distance views. • Make reference to the extensive footpath network and Dales Highway.
	5464	<p>Section: Chapter 3: LCA Type: F – Rolling Enclosed Pasture – Wharfedale Rolling Enclosed Pasture</p> <p>Addingham Civic Society (ACS) broadly supports this section but would like to see more detail specific to Addingham and its environs along the lines of the attached sheet.</p> <p>Under "Key Characteristics" (page182) it needs to be recorded that the village does have rural origins but was also heavily influenced by textiles manufacturing particularly the 17th and 18th centuries. Again under "Historic Landscape Classification and Cultural Heritage" most of the 100+ listed buildings relate back</p>	<p>The Key Characteristics section already indicates that settlements had their origins in agriculture but have been influenced by industrial growth – particularly wool and milling. Specific reference will be made to Addingham in this section to clarify the position.</p> <p>The listed buildings within this particular character area are mainly small cottages or other residential developments. It is appreciated that some of these will have been related to the textile industry. Reference can be made to this.</p> <p>Recommended change: Under the Key Characteristics section of LCA F2 amend the 6th bullet point to read: "Settlements within the area primarily have agricultural origins, but have since been influenced by industrial</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>to the local textile industry and the community that developed around it.</p> <p>‘Under "Guidance" (pages 201 to 203) ACS particularly welcomes the comments relating to the sensitivity to development and the careful consideration required. Future development opportunities may be limited if the historic settlements with relatively intact settlement patterns are to be preserved. This includes infill and ribbon development between Ilkley and Addingham. Infill in proximity to "Addingham Conservation Area" could also erode the historic rural setting.</p>	<p>growth, particularly in wool and milling. This is seen in the array of historic buildings in Addingham associated with textile manufacturing. Ilkley has origins as a Victorian holiday settlement... ..”</p> <p>Under the Cultural and Historic Landscape Character section include a reference that many of the listed buildings in Addingham relate back to the local textile industry.</p>
	5464	<p>Section: Chapter 3: LCA Type: F – Rolling Enclosed Pasture – Wharfedale Rolling Enclosed Pasture</p> <p>The “key characteristics & landscape character section” (pp 187), again underplays the value/character of the Addingham landscape which is summarised in the policies of the Addingham Neighbourhood Development Plan. Consideration should again be given to a separate section for Addingham.</p> <p>In summary, in Addingham Parish the Wharfe valley widens out to an attractive and more extensive area of countryside. Especially, in the catchment of Lumb Beck and its tributaries, which drain a large part of Addingham Moorside. Characterised by:</p> <ul style="list-style-type: none"> - well wooded steeply sided ghylls - many fine veteran field trees, and hedgerow remnants (in need of protection and management) 	<p>The Landscape Character Assessment has been prepared at the District scale and provides a broad overview of the different landscape character types and areas which can be identified within the District. More Localised Assessments could be undertaken as part of the preparation or updating of a Neighbourhood Plan.</p> <p>There is some scope to add further detail to the key characteristics, views & perceptual qualities, and guidance sections.</p> <p>Recommended change: In the Key Characteristics section make reference to the well wooded ghylls, and notable areas of semi-improved flower rich pasture and hay meadows.</p> <p>Under the View and Perceptual Qualities section make reference to the extensive views to and from the Yorkshire Dales National Park and Nidderdale National Landscape.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<ul style="list-style-type: none"> - a glacial meltwater channel running at right angles to the drainage, below “The Street”, a remnant of the Roman Road from Ilkley - notable areas of semi-improved flower rich pasture and hay meadows - several Local Wildlife Sites (Lumb Ghyll Woodland (plantation on ancient woodland), Far Bank (woodland and hedgerows along and below “The Street”), Stegholes (wild flower rich pasture, beck side woodland and hay meadows). <p>The “Views & Perceptual Qualities Section” (pp 189), should refer to the extensive views to and from the Yorkshire Dales National Park and Nidderdale National Landscape, especially along the valley from Ilkley towards Addingham and beyond, corresponding in part to the rising topography on the northern side of the river.</p> <p>“Guidance Section”(pp 203), should include the following recommendations for landscape and habitat enhancement, specific to the Lumb Beck Catchment, based on a habitat survey by Haycock & Jay for Yorkshire Dales Rivers Trust & Addingham Environment Group 2022 - as part of the Natural England Nature Recovery Network grant funded work:</p> <p>Himalayan balsam eradication. The survey found a notable absence of Himalayan balsam in much of the catchment, except in a number of hotspots. This is the result of an ongoing campaign with Addingham Environment Group volunteers working with landowners</p>	<p>Under the guidance section amend or add new bullet points to make reference to the following: Opportunities to for habitat connectivity through the planting of hedgerows, particularly in those areas which have suffered fragmentation. Opportunities for species rich grassland restoration particularly in LCA F2 around Addingham Moorside.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>to control Himalayan Balsam throughout the Lumb Beck and Marchup/Town Beck catchments.</p> <p>Woodland and watercourse fencing. Many of the watercourses in the catchment are wooded, but not all are protected from stock. It is recommended that all these areas should be fenced to protect the water courses and woodlands from stock damage.</p> <p>Hedge and tree planting. There are many opportunities to improve habitat connectivity through hedgerow planting as many existing hedgerows have become defunct or have been reduced to just scattered hawthorn trees. Tree planting and woodland creation could also be considered in other suitable areas, such as species poor grasslands.</p> <p>Species rich grassland restoration. The majority of grassland habitats in the area are improved or poor semi-improved. However, there are notable areas of richness, such as some hay-meadows on steep slopes, where agricultural improvement could not take place, particularly along the north-western banks of the Lumb Beck. These remnants show what could be achieved across Addingham Moorside.</p>	
	5464	<p>Section: Chapter 3: LCA Type: G – Settled Valley Floor – Wharfedale Settled Valley Floor</p> <p><i>The key characteristics & landscape character section</i> (pp 234) affords no prominence to the special</p>	<p>The Landscape Character Assessment has been prepared at the District scale and provides a broad overview of the different landscape character types and areas which can be identified within the District. More Localised Assessments could be undertaken as part of the preparation or updating of a Neighbourhood Plan.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>value/character of the landscape within Addingham Parish, notably:</p> <ul style="list-style-type: none"> - along The River Wharfe through Low Mill Village, on to St Peters Parish Church, through to High Mill, including 2 converted textile mills, medieval archaeology, agricultural heritage, plus the 19th century footbridge giving access to the National Landscape north bank and footpaths to the local landmark of Beamsley Beacon. - Beyond High Mill the open, continuous, high-quality landscape of parkland, woodland and grazing meadows towards Bolton Abbey and the YDNP, to the North Yorkshire boundary. The Dales Way passes through this section, with notable Grade 1 listed buildings (Farfield House and Farfield Quaker Chapel). This open stretch of valley floor is important to the setting of the YDNP, Beamsley Beacon and Nidderdale National Landscape. It could be made a separate sub-character area. NB National Landscape Character Area 21. 	<p>The key characteristics section aims to provide a general and broad overview of those elements which are important in the specific landscape. Although, it only makes limited reference to specifically named elements.</p> <p>However, it is recognised that some further details can be included.</p> <p>Recommended change: Update the Key Characteristics section to include reference to the heritage of the textile industry in the Addingham area (Low Mill and High Mill). Also make reference to the wider setting and views into the Yorkshire Dale National Park and Nidderdale National Landscape.</p>
	5464	<p>Section: Chapter 3: LCA Type: G – Settled Valley Floor – Wharfedale Settled Valley Floor</p> <p>Addingham Civic Society (ACS) generally welcomes this thorough study and the key elements set out in the Key Characteristics Section (page 234). Particularly:</p> <ul style="list-style-type: none"> - that the Settlement & Transport Pattern (pp 241) states that landscape of this area plays an important 	<p>The support of the document is noted.</p> <p>It is recognised that some additional detail could be added to certain sections.</p> <p>Recommended change: Update the following sections: Under the Settlement and Transport Pattern made reference to the linear nature of some of the settlements particularly Addingham.</p>

Comment ID	Respondent ID	Comment (Full text)	Council Response
		<p>role in separation of settlements and contributes to rural setting.</p> <ul style="list-style-type: none"> - the Access & Recreation (pp 242) that the Wharfedale Greenway is referenced as an important project, especially noting potential further links beyond Ilkley. - the Views & Perceptual Qualities (pp 243) refers to settlements having a strong sense of place with visual connections out to surrounding upland moors and valley sides. <p>However, it believes there should be more detail for Addingham as set out in the main Representation and the following additional comments:</p> <ul style="list-style-type: none"> - the Settlement & Transport Pattern (pp 241), the linear character of Addingham should be emphasised, as this is a distinct historical characteristic of the village and provides valuable views out to surrounding open moorland areas, which is one of the key landscape character elements identified in the document. The linear nature led to the village being referred to historically as “Long Addingham”. - the Pressures & Forces for Change (pp 255), various other areas are mentioned as being threatened by development affecting settlement character, but not G4 Wharfedale. - The Guidance (pp 256), should also include a reference to the “Wharfedale Greenway” to the effect “support ongoing development of the Greenway and avoid/resist proposals which could compromise 	<p>Under the Pressures and Forces for Change section make reference to the development pressures on the edges of settlements within the G4: Wharfedale Settled Valley Floor LCA and the need for careful management to prevent coalescence.</p> <p>Under the Guidance section update the 14th bullet point to make specific reference to the Wharfedale Greenway.</p>

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		<p>or cut off opportunities for developing and extending the route and future potential links.” Also protect “Green Spaces” identified in Addingham’s Neighbourhood Plan with their function of creating “Wildlife Corridors” through the urban area.</p> <p>Bolton Road passes through Addingham and is an important access to the Yorkshire Dales and Addingham is a key “gateway”. This another reason why the landscape at the top end of Bradford Region is so important to protect and preserve.</p>	

Table 3.4: Additional comments from internal meetings/workshops not listed in the formal comments in Table 3.1

Comment	Council Response
<p>Chapter 3: LCA Type A</p> <p>Page 29 - Do we need to say that Keighley Road is an unmetalled (in part) adopted road, therefore, not suitable for general traffic use?</p> <p>Page 30 - Access and recreation - do we want to say that Keighley Road is a popular route for mountain bikers (and equestrians?) linking Ilkley to Riddlesden and East Morton.</p> <p>Page 40 - Access and recreation – The West Yorkshire Waymarked Cycle Route passes through the area along Hill House Edge Lane to the south of Oakworth and skirts Oakworth Moor along Harehills Lane.</p>	<p>The bullet point will be amended to reference that Keighley Road is a unmetalled road (in part).</p> <p>Reference will be made to Keighley Road as a route for mountain bikers under the Access and Recreation section.</p> <p>Reference can be made to the West Yorkshire Cycle Route under this section.</p>
<p>Chapter 3: LCA Type B</p> <p>Page 54 – Access and Recreation – Makes reference to part of Route 69 of the National Cycle Network, however, that does not pass through the area. However, the West Yorkshire Waymarked Cycle Route passes through the area from Steeton, across Steeton Moor to Redcar Tarn to Laycock then along Todley Hall Road, Greystones Lane, Shipley Ford Lane, Whitehill Road and Green Lane/Slack Lane to Oakworth before heading out towards Oakworth Moor via Hob Cote Lane.</p> <p>Figure 3.36 – the Bridleways are not consistent without PROW map around Oakworth. It also has Bradford Cycle Route shown on the key and passing through Oakworth - I am not familiar with what this is.</p> <p>Page 64 - Access and recreation – says 3km of National Cycle Route 69, however it is only 1.7km. Also the Pennine Bridleway passes though the St Ives Estate and through Cullingworth and continuing along Trough Lane Pennine Bridleway - Calder Aire Link - LDWA Long Distance Paths. This should be shown on Figure 3.34. Also, St Ives Estate is good for cycling as well as walking connecting to Harden Moor which is popular with mountain bikers</p> <p>Figure 3.34 - does not show the full extent of the NCN 69 through Cullingworth it is shown as Bradford Cycle Route.</p>	<p>The bullet point will be amended to remove reference to NCW Route 69, and replaced with reference to the West Yorkshire Cycle Network. The interactive map will include the West Yorkshire Cycle Route.</p> <p>The PROW map includes layers from the rights of way team and include both footpaths and bridleways. The Bradford Cycle Route – these are areas of PROW or cycle lanes.</p> <p>The text says that ‘sections of cycle routes include <i>part of a</i> (my emphasis) 3km isolated stretch of NCR69. It does not say it includes the full 3km. Figure 3.34 already shows the location of Bridleways. However, reference in the text to the Calder Aire Link will be made. Reference will be made to the use of Harden Moor for mountain biking.</p> <p>The symbology of the routes is difficult to show when there are two designations. This will be</p>

Comment	Council Response
<p>Page 74 - Access and recreation – Baildon Moor open access land is also a popular destination for mountain bikers (I assume they are permitted on the open access land) however, it does have a couple of Bridleways crossing it. Also, the West Yorkshire Cycle Route between Ilkley and Silsden passes through the area.</p>	<p>rectified on the interactive map once the SPD is published.</p> <p>Reference will be made to the area as a destination for mountain biking. Reference will also be made to the West Yorkshire Cycle Route.</p>
<p>Chapter 3: LCA Type C</p> <p>Page 98 - Access and recreation - the West Yorkshire Waymarked Cycle Route passes through the area entering the area along New Laith Lane through Stanbury, Haworth and Oxenhope before heading toward Warley Moor.</p> <p>Page 108 - Access and recreation it should say that the NCN route 69 runs along the Hewenden Viaduct NOT reservoir. Also, St Ives estate is for cycling as well as walking.</p>	<p>Reference will be made to the West Yorkshire Cycle Route.</p> <p>Wording to be amended to say Hewenden Viaduct.</p>
<p>Chapter 3: LCA Type D</p> <p>Page 122 – Access and recreation – is it worth mentioning the canal towpath NCN route 69 that runs along the edge of the area is popular with walkers and cyclists.</p> <p>Page 132 – Access and recreation – Thwaites Brow Road (the Twines) is a popular classic cobbled climb for cyclists linking the Thwaites area of Keighley with Long Lee.</p>	<p>The route is not located within this area. It is covered in LCA G2. No change required.</p> <p>Reference will be made to Thwaites Brow Road in relation to it being a popular classic cobbled climb for cyclists.</p>
<p>Chapter 3: LCA Type E</p> <p>Page 165 – Access and recreation. Instead of Two separate sections of the Great Northern Rail Trail, say the southern section of the GNRT running between Thornton and Queensbury providing a 3.5km shared use path.</p> <p>Figure 3.109 - Remove the Bradford Cycle Route between Queensbury to Thornton, so it is clearly shown as National Cycle Network.</p>	<p>Unclear why this change is necessary.</p> <p>The symbology of the routes is difficult to show when there are two designations. This will be rectified on the interactive map once the SPD is published.</p>
<p>Chapter 3: LCA Type F</p> <p>Page 179 – Access and recreation – canal towpath provides a walking cycling route passes along the route between Skipton and Leeds and forms part of NCN Route 69. Also, the West Yorkshire Cycle Route passes through the area from Steeton through Silsden towards Ilkley along Howden Road.</p>	<p>The canal towpath does not fall within this LCA. It is within the adjacent G1 LCA.</p> <p>Reference will be made to the West Yorkshire Cycle Route.</p>

Comment	Council Response
<p>Page 189 - Access and Recreation – do we want to say anything about the desire to develop Wharfedale Greenway between Otley and Addingham with a Spur to Menston here?</p> <p>Page 198 - Settlement and Transport Pattern – is it worth saying that Raikes Lane/New Lane which runs between Holme Wood and Tong is closed to through traffic making it a more attractive route for walkers, cyclists and equestrians.</p> <p>Page 199 - Access and Recreation – is it worth saying that the Pudsey 10K running route passes through the area.</p> <p>Page 201 - Development F3 - should this say housing and employment development and supporting infrastructure?</p> <p>Page 202 - Tourism Recreation and Access – Do we need to refer to the Wharfedale Greenway here?</p>	<p>This section is about what already exists. The pressures and forces for change / guidance sections would be a better place to make reference to this proposed route.</p> <p>This is a too localised level of detail to be included on this occasion.</p> <p>This is a too localised level of detail to be included on this occasion.</p> <p>This text was originally referring to the previously proposed South East Bradford Access Road (SEBAR) – however, it may also be applicable to any proposed new development in this LCA and the wording will be amended according.</p> <p>Additional wording to be added to make reference to the need to sensitively manage the development of the Greenway.</p>
<p>Chapter 3: LCA Type G</p> <p>Page 213 – Access and recreation - West Yorkshire Cycle Route passes through the area from Steeton through Silsden.</p> <p>Page 222 – Access and recreation second bullet point add with connections into Keighley town centre and Utley. Also need to refer to the Worth Way Walking Route.</p> <p>Page 232 – Access and recreation – Popular area for mountain biking trails in Spring Wood and Buck Wood.</p> <p>Figure 3.159 - remove the Bradford Cycle Route so can easily see NCN.</p> <p>Page 242 – Access and recreation – Wharfedale Greenway between Otley and Addingham and beyond into North Yorkshire.</p> <p>Figure 3.175 - remove the Bradford Cycle Route so can easily see NCN.</p>	<p>Reference will be made to the West Yorkshire Cycle Route.</p> <p>Reference will be made to the connecting links and also the Worth Way walking route.</p> <p>Reference will be made to these locations as mountain biking areas.</p> <p>The symbology of the routes is difficult to show when there are two designations. This will be rectified on the interactive map once the SPD is published.</p> <p>Reference is already made to the proposed Greenway.</p> <p>The symbology of the routes is difficult to show when there are two designations. This will be</p>

Comment	Council Response
	rectified on the interactive map once the SPD is published.
<p>Chapter 3: LCA Type H</p> <p>Page 267 – Access and recreation – first bullet point make particular reference to Chellow Dene and Heaton Woods.</p> <p>Figure 3.192 - remove the Bradford Cycle Route so can easily see NCN.</p> <p>Page 277 – Access and recreation – Deep Lane and Pity Beck popular walking routes.</p>	<p>Reference will be made to these areas.</p> <p>The symbology of the routes is difficult to show when there are two designations. This will be rectified on the interactive map once the SPD is published.</p> <p>Reference will be made to these routes.</p>

4. List of proposed map updates to be made prior to adoption

- 4.1 The maps listed below are required to be amended to ensure they reflect the most up-to-date data/information. These changes are partly a result of the comments received to the public consultation undertaken in November/December 2025, and also due to new data releases since the preparation of the document.
- 4.2 It is proposed that these maps will be updated prior to the publication of the final document (once adopted).
- Figure 2.1 – Update map with revised names
 - Figure 3.5 – Update map to include new NNR designation
 - Figure 3.13 - Update map to include new NNR designation
 - Figure 3.26 – Update map to include the West Yorkshire Cycle Route
 - Figure 3.30 - Update map to include new NNR designation
 - Figure 3.35 – Update LCA name
 - Figure 3.37 – Update LCA name
 - Figure 3.38 – Update LCA name and to include new NNR designation
 - Figure 3.39 – Update LCA name
 - Figure 3.40 – Update LCA name
 - Figure 3.41 – Update LCA name
 - Figure 3.42 – Update LCA name
 - Figure 3.63 - Update map to include new NNR designation
 - Figure 3.67 - Update map to show additional access land
 - Figure 3.72 - Update map to include new NNR designation
 - Figure 3.80 - Update map to include new NNR designation
 - Figure 3.102 - Update LCA name
 - Figure 3.104 - Update LCA name
 - Figure 3.105 - Update LCA name
 - Figure 3.106 - Update LCA name
 - Figure 3.107 - Update LCA name
 - Figure 3.108 - Update LCA name
 - Figure 3.109 - Update LCA name
 - Figure 3.122 - Update map to include new NNR designation
 - Figure 3.147 - Update map to include new NNR designation