City of BRADFORD
METROPOLITAN DISTRICT COUNCIL

Bradford District Local Plan

Statement of Consultation

Preferred Options (Regulation 18)

October 2026

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1. Introduction

Purpose of this statement

1.1 It is important that the council engages with the community throughout the preparation of planning policy documents. In doing so the council follows its adopted Statement of Community Involvement (SCI) (2018)[1] and when consulting on the Local Plan and Supplementary Planning Documents (SPDs), the Regulations governing the development plan process.

1.2 This Statement of Consultation sets out how the Council has involved residents and key stakeholders in the preparation of the draft Bradford District Local Plan 2020 to 2038 in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012[2]. It also provides evidence in preparation for the Regulation 22 submission statement.

Background

1.3 Following the adoption of the Core Strategy Development Plan Document (DPD) in 2017, the Council motioned to commence a review of the development plan. A scoping consultation was undertaken in January 2019, followed by further consultation on a Core Strategy Partial Review in October 2019 which detailed changes to specific adopted Core Strategy policies.

1.4 Following significant changes to national planning policy and local strategies since the adoption of the Core Strategy, the Council motioned it would begin preparing a new Local Plan in 2020. The new Local Plan will look to 2038 and identify the main areas for sustainable development growth. It establishes polices and guidance to ensure local development is built in accordance with the principles set out in the National Planning Policy Framework (NPPF).

1.5 The local and national drivers shaping the new Local Plan direction include:-

- Clearer plan-making – with policy and site considerations worked up in parallel.
- Potential major infrastructure investment providing the catalyst to revisit city master planning and the delivery of the Bradford City Centre Area Action Plan.
- Embedding site allocations within an increasing complex range of policy considerations and moving forward with a more area-based approach overall.
- Setting the foundations for a single plan to move forward within a revised national planning context focused more explicitly on area-based planning.

1.6 The Local Plan will replace the adopted Core Strategy and will incorporate both planning policies and land allocations into one Plan document. The Local Plan

[1] Adopted Bradford Statement of Consultation 2018

[2] The Town and Country Planning (Local Planning) (England) Regulations 2012

supersedes the previous work programme set out within the Local Development Scheme (LDS). It presents a clear direction and intent to be further refined as the plan moves from its current Regulation 18 stage to final Submission Draft (Regulation 19).

Draft Bradford District Local Plan – Regulation 18

1.7 This statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the draft Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by consultation / representations.

1.8 It also explains how we consulted and how the views of consultees have influenced the next stage of plan-making. This statement also specifically contains the summaries of comments received to the consultation questions asked during this consultation.

Structure

1.9 This statement comprises four separate sections:

- Section 1 is an introduction.
- Section 2 sets how the consultation was undertaken.
- Section 3 outlines how comments were received.
- Section 4 provides a summary of the main issues raised to the Regulation 18 consultation and how these have been taken into account.

1.10 Section 2 and 3 are supported by five appendices detailing how the consultation was undertaken.

- Appendix 1A – Notice of Consultation
- Appendix 1B - Temporary SCI suspension notice
- Appendix 1C - List of Statutory consultees
- Appendix 1D – Communication to stakeholders
- Appendix 1E – Press notices and media articles
- Appendix 1F – Plan-it Bradford Newsletter – February 2021

1.11 Section 4 is supported by an appendix section outlining a summary of the responses received at the Regulation 18 stage and includes how the comments were considered by the Council.

- Appendix 2 – Summary of the representations and CBMDC responses linked to the Regulation 19 Consultation.

2. How was the consultation undertaken?

2.1 In line with the requirements of the planning regulations and best practice, the Council undertook a 6-week public consultation from **Monday 8th February 2021 to Wednesday 24th March 2021.**

2.2 Full details of the consultation were published in a 'Notice of Consultation' which was available online and sent to consultees. A copy of this notice can be found in ***Appendix 1A***.

2.3 The following consultation documents were produced and made available during the consultation period:

- Bradford District Local Plan (Regulation 18) Preferred Options Report (February 2021)
- Sustainability Appraisal and Strategic Environmental Assessment – Interim Report to accompany Regulation 18 consultation (February 2021)
- Habitats Regulations Assessment (HRA) – Preferred Options (February 2021)
- Equalities Impact Assessment (EqIA) – Preferred Options (February 2021)
- Health Impact Assessment (HIA) – Preferred Options (February 2021)

2.4 An interactive policies map displaying proposed sites for housing and employment was available for viewing and direct commenting via OpusConsult. Additionally, several PDF files making up the District map were available on the Council's website for viewing and download.

2.5 In addition to the consultation documents, a range of evidence base documents were published to support the approach of the plan, these included:

- 5-year Housing Land Supply Statement - Apil 2020 to March 2025 (January 2021)
- Bradford Gypsy and Traveller and Travelling Show person Accommodation Assessment Update – Report (January 2021)
- Bradford Housing Need Addendum Report 2021 (February 2021)
- Duty to Cooperate Strategy (February 2021)
- Flood Risk Technical Note (2021)
- Future Employment Analysis Paper (February 2021)
- Green Belt – Overview Paper, Parcel Assessment Methodology, Report, Proformas and Site Specific Assessments (February 2021)
- Heritage Impact Assessment Report and Site Assessments (Part 1 and Part 2) (February 2021)

- Housing Growth - Policy SP8 - Technical Note (2021)
- Local Infrastructure Plan (February 2021)
- Local Plan and CIL Financial Viability Assessment Report & Appendices (January 2020)
- Minerals Background Paper and Evidence Report (February 2021)
- Minerals Background Paper and Evidence Report - Appendices 1 and 2 (February 2021)
- Open Space Audit Report (February 2021)
- Open Space Needs and Demand Assessment (August 2020)
- Retail and Leisure Study (October 2019) & Appendices
- Site Assessment and Rejected Sites Background Paper (February 2021)
- Strategic Housing Market Assessment (SHMA) (2019)
- Strategic Land Assessment (SLA) (January 2021)
- Updating the Demographic Evidence Report (February 2021)

2.6 Alongside this consultation, the Council also held a Call for Sites exercise. Further details of the consultation can be found later in this report.

Impact of the Coronavirus (Covid-19) pandemic on the consultation

2.7 During the later stages of preparing the Preferred Options consultation document, events on the global stage were unfolding in the early months of 2021. The Coronavirus pandemic took hold and the nation was plunged into a national lockdown.

2.8 The Government issued new legislation for local development documents, amending on a temporary basis Regulations 35 and 36 of Town and Country Planning (Local Planning) (England) Regulations 2012. The temporary Town and Country Planning (Local Planning) (England) (Coronavirus) (Amended) Regulations 2020 removed the requirement to make certain documents available for inspection at premises and to provide hard copies on request. The documents must, instead, be available for inspection online. This amendment ensured that Local Planning Authorities could continue to progress up-to-date Local Plans.

2.9 This amendment commenced on 16th July 2020 ending 31st December 2020; however this was later extended until 31st December 2021.

2.10 From January 2021 to 31 December 2021, the Council issued a temporary suspension notice of parts of the SCI in respect of publicity of planning documents as part of the Covid-19 crisis. During this period the Council was not able to make hard copies of consultation documents available within deposit locations due to location closures and the risks associated with Covid-19. All consultation documents were made available online and this was communicated within the consultation literature.

2.11 A copy of the temporary suspension notice of parts of the SCI is available in ***Appendix 1B***.

Availability of consultation documents

2.12 The consultation document and supporting documents were made available online to view and comment on via the Council's OpusConsult consultation portal and copies were available to view on the Council's dedicated Local Plan consultation webpage.

2.13 Printed hard copies of the consultation documents were not available during the consultation period as a result of the Coronavirus pandemic. Once Covid restrictions relaxed the Council placed copies of the documents for inspection at the deposit locations listed below.

- Bradford Council's Contact Centre, Britannia House
- Council One Stop Shop at Keighley Town Hall
- The main local libraries in the following locations: Bradford City Centre, Bingley, Keighley, Shipley, Ilkley and Bradford Local Studies.

2.14 Notifications of the availability of the consultation documents were given in the consultation letter and notification E-mail, in the Plan-it Bradford e-newsletter, Council website along with advertisements in the local press.

Who was consulted?

2.15 A total of **7,259** e-bulletins were sent out via the Councils online 'Stay Connected' system on 8th February 2021. These included:

- 85 Statutory consultees (including 5 Members of Parliament)
- 7,024 individuals who have signed up to the Stay Connected system
- 90 CBMDC Councillors

2.16 A list of the statutory bodies who were consulted is available within ***Appendix 1C***.

How the public and other stakeholders were consulted

2.17 The Council used several different methods of community consultation and engagement which aimed to reach the different groups within the community. The ranges of methods used are outlined below:

2.18 The Council uses an online GovDelivery system known as 'Stay Connected' to distribute e-bulletins to the public. Individuals can sign up and register to receive email bulletins on specific services of the Council which is of interest to them. There is an option to sign up to receive 'Planning Policy' updates. An extract of the e-bulletin which was distributed can be found in ***Appendix 1D***.

2.19 A press release was issued to media company Newsquest Group who produce the newspapers covering the Bradford District in advance of the consultation. The local

newspapers published details of the consultation and examples of the published articles can be found in ***Appendix 1E.*** This appendix also includes a list of a further 50 media article links which were published during the consultation period. .

- Telegraph and Argus – 9th February 2021
- Ilkley Gazette – 8th February 2021

2.20 The Council's Local Plan website (www.bradford.gov.uk/planningpolicy), in particular the Local Plan Regulation 18 webpage was used to facilitate communication of the consultation and the time period and deadline for comments to be received.

2.21 The Plan-It Bradford e-newsletter (February 2021) was circulated to 7,024 persons registered on the 'Stay Connected' system announcing the imminent start of the consultation. The newsletter was also made available on the Planning Policy webpages. An extract article of the consultation can be found in ***Appendix 1F***.

Online Workshop Events

2.22 Online themed workshop events were organised as part of this consultation due to the limited face to face meetings that could be undertaken at this time. These events were aimed at residents, community groups, Parish and Towns Councils, agents, developers and other interested parties who had either been involved in or had requested involvement in the Local Plan process.

2.23 The events provided an opportunity for attendees to ask questions to assist in being able to respond to the consultation.

2.24 There was a total of 380 attendees across 22 workshops.

2.25 Details of the workshop events can be found in Table 2.1 below. Presentation and questions and answers from each session are available online via the Consultation Events – March 2021 web page.

Table 2.1: Details of workshop events

Workshop Theme	Date	Time	No. of attendees
Transport Policies	1 March 2021 9 March 2021	12 - 1.30 4 – 5.30	21 20
Regional City of Bradford – Key proposals	1 March 2021 8 March 2021	4 - 5.30 12- 1.30	11 12
Housing Policies	2 March 2021 8 March 2021	12 - 1.30 4 - 5.30	29 11
Wharfedale – Key proposals	2 March 2021 9 March 2021	4 - 5.30 12 – 13.30	26 29
Economic Policies	3 March 2021 4 March 2021	12 - 13.30 4 - 5.30	7 9

Workshop Theme	Date	Time	No. of attendees
Pennine Towns and Villages – Key proposals	3 March 2021 10 March 2021	4 - 5.30 12 – 1.30	8 11
Environmental Policies	4 March 2021 11 March 2021	12 - 1.30 4 – 5.30	23 18
Housing Innovation – specialist housing, modular, self-build and urban housing	5 March 2021	12 - 1.30	20
Youth Network Event	5 March 2021	4 - 5.30	12
City Centre and Regeneration	10 March 2021	4 – 5.30	17
Airedale – Key proposals	11 March 2021 12 March 2021	12 – 1.30 4 – 5.30	26 20
Infrastructure Planning and the Local Plan	12 March 2021	12 – 1.30	26
Thornton and Allerton Ward	8 March 2021	PM	6
Keighley East Ward	19 March 2021	5.30 – 6.30	24

3. Summary of the responses to Regulation 18

3.1 A total of **5,916** individuals/organisations submitted **29,685 comments** relating to various sections of the draft Local Plan (Preferred Options), Local Plan Interactive Map and supporting documents. These included agents submitting comments for one or more clients.

3.2 During the consultation, the Council received a vast number of pre-populated response forms from members of the public within the Tong Valley and Leeds concerning the proposals within Bradford South East. The content of the representations was a standard response. These pre-filled in forms were distributed to residents residing within the District and to those outside of the Bradford District, mainly within the Pudsey area of Leeds to complete Part A and then were collected. Over 550 of the same form were also submitted to the Council by individuals.

Method and distribution of comments Received

3.3 The Council received comments via a number of methods, including through an online consultation portal (OpusConsult), E-mail and postal submissions. Whilst the largest numbers of submissions were from the 'Tong Valley' batch, there was roughly equal amount of submissions received by e-mail and post. The table below identifies how many responses received by each method.

Table 3.1: Method and distribution of the comments received for the consultation and supporting documents.

Document name	Respondents	Objectors	Submission method			Support / Object			Status			Totals
			Web	Email	Paper	Support	Object	Comment	Accepted	Rejected	Withdrawn	
Draft Bradford District Local Plan - Preferred Options (Regulation 18) February 2021	5914	5686	6010 (20%)	23383 (79%)	130	1881	26338	1304	29523	1	9	29533
Bradford District Local Plan - Interactive Map	8	7	4 (36%)	7 (64%)	0	1	10	0	11	0	0	11
Supporting Documents of the Draft Bradford District Local Plan - Preferred Options (Feb 2021)	63	61	16 (11%)	125 (89%)	0	32	106	3	141	0	0	141
Totals	**5916**	**5694**	**6030 (20%)**	**23515 (79%)**	**130**	**1914**	**26454**	**1307**	**29675**	**1**	**9**	**29685**

3.4 Of the 29,675 duly-made representations received by the Council, the majority of the comments (89%) were objections to the draft Local Plan and the supporting documents. There were relatively few comments received in relation to its supporting documents.

3.5 Table 3.2 overleaf illustrates the distribution of the comments received against the supporting document and evidence base.

Table 3.2: Distribution of the comments received for the supporting documents.

Section name	Respondents	Objectors	Support	Object	Comments	Representations	Form Responses
Supporting Documents							
Evidence base documents							
Retail and Leisure Study (2019)	0	0	0	0	0	0	0
Open Space Audit Report 2021	2	1	1	1	0	2	0
Open Space Needs and Demand Assessm...	2	1	1	1	0	2	0
Local Insights - Area Profile Reports (Dec ...	0	0	0	0	0	0	0
5 Year Housing Land Supply Statement (Ja...	0	0	0	0	0	0	0
Duty to Cooperate Strategy (Feb 2021)	0	0	0	0	0	0	0
Minerals Background Paper and Evidence ...	0	0	0	0	0	0	0
Minerals Background Paper and Evidence ...	0	0	0	0	0	0	0
Gypsy and Traveller and Travelling Showpe...	0	0	0	0	0	0	0
Bradford Housing Need Addendum Report ...	0	0	0	0	0	0	0
Flood Risk Technical Note 2021	1	1	1	1	0	2	0
Future Employment Analysis Paper 2021	0	0	0	0	0	0	0
Heritage Impact Assessment Report (Feb 2...	2	0	2	0	0	2	0
Heritage Impact Assessment - Site Assess...	0	0	0	0	0	0	0
Heritage Impact Assessment - Site Assess...	0	0	0	0	0	0	0
Local Infrastructure Plan (Feb 2021)	0	0	0	0	0	0	0
Updating the Demographic Evidence Repo...	0	0	0	0	0	0	0
Strategic Land Assessment (Jan 2021)	4	4	0	4	0	4	0
Site Assessment Update Report (Feb 2021)	37	35	3	48	1	52	0
Supporting documents							
Statement of Consultation of the Allocatio...	0	0	0	0	0	0	0
Engagement Plan - Bradford District Local ...	0	0	0	0	0	0	0
Regulation 18 Statement - Bradford District...							
Local Plan Frequently Asked Questions (F...							
Impact Assessments							
Habitats Regulations Assessment (HRA) (F...	3	3	2	3	0	5	0
Equality Impact Assessment (Feb 2021)	1	1	0	1	0	1	0
Sustainability Appraisal & Strategic Enviro...	3	2	15	8	0	23	0
Sustainability Appraisal & Strategic Enviro...	0	0	0	0	0	0	0
Sustainability Appraisal & Strategic Enviro...	2	2	1	5	1	7	0
Sustainability Appraisal & Strategic Enviro...	10	10	2	11	0	13	0
Sustainability Appraisal & Strategic Enviro...	5	5	1	8	0	9	0
Sustainability Appraisal & Strategic Enviro...	2	2	0	3	0	3	0
Sustainability Appraisal & Strategic Enviro...	2	2	0	3	0	3	0
Sustainability Appraisal & Strategic Enviro...	8	7	3	9	1	13	0

Table 3.1: Type of contributor to the Draft Local Plan – Preferred Options

Type of Contributor	No. of comments received
Statutory Consultee	831
Adjoining Local Authorities	40
Town & Parish Council	236
Member of Parliament (MP)	48
CBMDC Councillor	302
Local Organisations / Businesses	498
Planning Agent / Developer / Landowners	629
Local Residents	27,091

4. Main issues raised pursuant to Regulation 18:

Bradford District Local Plan: Preferred Options

A wide range of issues were raised in relation to the Local Plan - Preferred Options document. Of the 29,523 total representations received at the Regulation 18 stage, the key broad issues raised in the representations, included:

- General scale and distribution of development (housing and employment).
- Need to support regeneration and use of previously developed land.
- Need to safeguard Green Belt and green spaces.
- Impact on settlements and communities of differing scales of development.
- Need to protect and manage key assets including natural and built environment.
- Need for adequate infrastructure (including transport, education, health and utilities) to support development.
- Detailed comments on specific allocations and designations.
- Significant levels of representations which opposed development to the east of Holme Wood.

Sustainability Appraisal - Preferred Options Report

The representations received in respect of the SA/SEA focussed on the following:

- The various sustainability objectives and the need to make sure that the framework included relevant targets relating to the natural and water environments. A number of the objectives were also supported.
- Updating the list of Policies, Plans and Programmes set out in Appendix A, to reflect various plans/strategies relating to the water environment. There was also support for inclusion of various UK and internal plans policies and strategies on the list.
- Detailed comments on the scoring of individual proposed site allocations against the Sustainability Appraisal objectives/framework.

Habitats Regulations Assessment – Preferred Options Report

The representations received in respect of the HRA focussed on the following:

- The need to consider the outcomes of the HRA used by the Secretary of State in determine the planning application on land at Sun Lane (proposed site allocation BU1/H) as part of the Local Plan.
- Impacts arising from urban effects on the SPA/SAC being over-stated, whilst the impact assessment in relation to functionally linked was considered to be flawed. It was also highlighted that there was a need to undertake an assessment of the impact of traffic emissions on the SPA/SAC.
- Support for the overall approach taken in HRA, noted the fact that further would be undertaken ahead of the Regulation 19 version of the Plan.

- Support for the approach to assessing the loss of functionally linked land for SPA birds, recreational disturbance and urban edge effects. Recommended that Natural England be consulted on a revised HRA

Equality Impact Assessment – Preferred Options Report

One comment of objection was received. The report fails to address the detrimental impact of the proposed site released at Holme Wood south, coupled with the SEBAR on local residents.

How the issues raised have been dealt with

The comments received help to demonstrate to policy officers if the proposed policy approach and scope are appropriate for the Bradford District and in the determination of planning applications.

Planning Policy officers have read, analysed and responded, where appropriate, to the representations which were received during the consultation. The consensus of the comments along with further evidence base studies provide a basis to help inform the next stage of the preparation of the Local Plan.

A summary of the comments and issues raised are presented in policy, local area strategy and site order to make this report manageable. Please refer to **Appendix 2** for these summaries.

Appendix 1A: Notice of Consultation

City of Bradford Metropolitan District Council

Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

Public Consultation Notice – Regulation 18

NOTICE IS HEREBY GIVEN that the Regulation 18 consultation period for the Draft Bradford District Local Plan (Preferred Options) commences for six weeks from Monday 8th February 2021 to Wednesday 24th March 2021.

You are invited to comment on the **Draft Bradford District Local Plan – Preferred Options** and supporting documents.

The Bradford District Local Plan and supporting documents are available to view and comment on the Local Plan Consultation website. Documents are also available to view on the Council's Planning Policy website.

You may submit your comments:

Online: The Council is encouraging representations to be submitted where possible through an on-line comments form which is available on the Council's website.

Alternatively, comments can be sent:

By e-mail to: planning.policy@bradford.gov.uk. Please include 'Bradford District Local Plan' within the subject box.

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

All responses must be received no later than **Wednesday 24th March 2021**.

Further Information

Online Events

The Council will be hosting a series of online events to be held in March. Details of these will be made available on the consultation web page and issued within an E-bulletin.

Julian Jackson, Assistant Director, Planning, Transportation & Highways

City of Bradford Metropolitan District Council

Appendix 1B: Temporary suspension of SCI Notice

City of BRADFORD METROPOLITAN DISTRICT COUNCIL

Temporary suspension of parts of the Bradford District Local Plan - Statement of Community Involvement (SCI) in respect of publicity of planning policy documents during COVID-19 crisis.

Introduction

During these unprecedented times as a result of the COVID-19 (Coronavirus) pandemic, the Council may be unable to undertake planned community consultation on Local Plan documents and a variety of planning application types in the precise way as set out in the adopted Revised Statement of Community Involvement (2018).

This issue has been acknowledged by the Government in the issuing of a new Statutory Instrument for Planning and the revocation of Regulations 35 and 36 of the Town and Country Planning (Local Development) (England) Regulations 2012 (as amended) and others detailed below which relate to public consultation and the availability of documents.

These temporary measures to revoke certain parts of the regulations are not reflected in the consultation requirements as set out within the Council's adopted Revised Statement of Consultation (SCI) 2018. Therefore, the Council has approved the temporary suspension of paragraphs 5.8.2, 5.8.3 and 5.8.4 of the SCI in respect of the availability of planning policy documents during this time.

Current Regulations

The following Regulations set out certain requirements in relation to public consultation measures which must be undertaken during Local Plan preparation:

- Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended);
- Neighbourhood Planning (General) Regulations 2012 (as amended); and
- Environmental Assessment of Plans and Programmes Regulations 2004 (as amended).

Temporary changes to the Regulations

The Government has laid a new Statutory Instrument (SI) for planning. The Local Planning, Development Management Procedure, Listed Buildings etc. (England) (Coronavirus) (Amendment) Regulations 2020 (SI 2020/1398) amends a number of regulations which were made in response to the pandemic, extending the current temporary measures to 31 December 2021. This includes local planning and spatial development strategies, and temporary development management measures due to expire in December this year. The new SI allows councils to continue to make relevant planning documents available online rather than being required to provide hard copies. The new regulations come into force on 24 December 2020.

From 30th December 2020, the Environmental Assessment of Plans and Programmes (Coronavirus) (Amendment) Regulations 2020 (SI 2020/1531) permanently removes the requirements for the responsible authority to keep a copy of documents relating to their strategic environmental assessment of a plan or programme at its principal office for inspection, and provide for a copy to be obtainable from that office.

In addition, the Government has postponed all neighbourhood plan referendums until at least 6th May 2021. This is set out within the following Statutory Instrument The Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020 (SI 2020/395).

Revised Statement of Consultation (2018)

The Statement for Community Involvement (SCI) is a statutory planning document which the Council is required to prepare under planning legislation. The SCI reflects the regulatory requirements and sets out the Council's complementary measures with regards to public consultation. The Councils' SCI was adopted on 8th July 2008 and a revised version was approved by the Councils' Executive Committee on 6th November 2018.

Following any public consultation on Local Plan documents, a Statement of Consultation report is produced to outline how public consultation has been undertaken in accordance with the relevant regulations and the SCI. These reports form part of the evidence base towards public Examination of the plan to assess the soundness and legal compliance of the process undertaken. Any issues relating to non-compliance or procedural matters could result in the plan being found unsound by a Planning Inspector.

Local Plan and Supplementary Planning Documents

Arrangements set out in the SCI for the preparation of Local Plan documents require, amongst a range of other consultation measures, that hard copies of consultation documents and supplementary documents be made available for inspection 'at Council offices and at the main local libraries' (para 5.8.2).

Due to the current Covid-19 crisis, the requirement for social distancing measures to be upheld and issues relating to quarantining of materials, it may not be possible at such time of a planned public consultation to fulfil the requirement due a number of issues which may relate to:

- Local libraries and Council offices either being closed;
- Buildings and premises operating under limited access arrangements;
- Sudden closure due to staffing issues as a result of a Coronavirus outbreak.

In order to continue to progress the Local Plan documents and provide opportunities for people to be involved in a safe manner, it is deemed appropriate to temporarily suspend, in part, the relevant sections of the SCI relating to the availability of documents.

The guidance relating to the Covid-19 pandemic changes rapidly. The Local Plan Team will constantly monitor and review the situation as well as the Council's position with regards to the opening up of Covid secure Council buildings and libraries to members of the public. At such time of a planned public consultation it is possible to place consultation materials on deposit, infection control measures will be put in place to protect the public.

Neighbourhood Planning

Whilst the Statement of Community Involvement does not set out specific requirements related to the conduct of consultations associated with Neighbourhood Plans, it does highlight the Local Planning Authority's role in publicising in relation to applications for Neighbourhood Areas and in relation to publicising Neighbourhood Planning proposals (under Regulation 16 of the Neighbourhood Planning Regulations).

The Council's Local Plan Team has a duty to support and advise neighbourhood planning bodies and this duty is set out within paragraph 5.6.2 and Figure 2 of the SCI. Whilst the Council will continue to provide support to groups online, by Email and telephone, officers will not able to attend any group or public meetings during this period.

In line with the revised regulations relating to Neighbourhood Plan referendums, the Council will not put any plans forward for local referendum until after 6th May 2021.

Equalities Act and responsibilities

In order to fulfil Public Sector Equality Duty in line with the Equality Act, the Council will outline within Engagement Plans how it intends to consult with the various equality groups during this period until 31st December 2021.

Whilst face-to-face meetings may not be possible, there are a range of groups and networks within the Bradford District which represent equality groups which the Council can target electronic communications to.

Decision Making

This statement sets out the implications of the current situation on any consultation exercise which may be undertaken during this time. The matters subjects of this note are:

1. To suspend Paras 5.8.2 – 5.8.4 of the Council's Revised Statement of Community Involvement (SCI) (2018) insofar as it relates to the **provision of hard copies of consultation documents** at Council offices and local libraries until at least 31st December

2021 or [b] until which time the Council deems local libraries and Council offices be Covid-19 secure in line with the current Government guidance in order to open to members of the public.

2. To suspend Para 5.6.3 of the Council's Statement of Community Involvement (SCI) insofar as it relates to the **preparation of Neighbourhood Plans**, and to be accompanied by the provision of associated **advice to neighbourhood planning groups** in relation to consultation on neighbourhood plans subject to [a] review in the event that government changes the requirements for social distancing and isolation relation Covid-19 within that period or [b] review on or before 31st December 2021.

3. To **postpone all neighbourhood plan referendums** until at least 6th May 2021, in line with The Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020.

Recommended Alternatives

The COVID-19 crisis is proving to be unpredictable and rapidly changing. Whilst it is a challenging time for everyone, the Council must continue to progress work on producing a Local Plan for the Bradford District. The Council's alternative approaches to ensure continued participation in Local Plan consultations are set out below. Should Government guidance or amendments to legislation or regulations be published, the Council will act accordingly to meet the legal requirements.

The temporary measures set out in this report are proposed to protect the health and well-being of our communities and follows national advice and guidelines at the current time of writing. For all Local Plan consultations, the Council will carefully consider whether it is safe, feasible and appropriate to carry out a public consultation, in a way that does not prejudice the ability of people to be engaged in terms of fairness and equality for all. The Council may in some cases need to adjust its timescales for document preparation and consultation accordingly.

The approaches and actions below set out how the Council intends to adapt its consultation methods during the period up until 31st December 2021. Further details surrounding specific consultation exercises will be outlined in full within separate Engagement Plan documents which will provide specific details of how the Council will seek to engage and consult with the local community on Local Plan documents in line with the SCI and current government guidance.

<u>Engaging with the Community</u>

The ability to have consultation documents on deposit within public services and buildings may be unexpectedly disrupted which could affect the ability of the Council to maintain a

position with regard to the availability of consultation documents within local libraries and council offices. These services may have to close fully or re-open partially to bespoke services such as a library 'click and collect' services. The Local Plan Team will track the current position of these services and seek to offer alternative ways to access hard copy documents. This position will be fully communicated within the accompanying Engagement Plan for the consultation and on the consultation webpage on the Council's website.

For those persons who wish to see a physical copy of the consultation material, hard copies will be made available on case by case basis upon request to the Local Plan Team and posted out where possible. This option may incur a fee for the customer to cover printing and admin costs as outlined in paragraph 5.8.6 of the SCI. This will be communicated within consultation material and on the website.

Another alternative should local libraries be offering either a 'click and collect' service or bookable appointments, would be to deposit the consultation materials in boxes and have a quarantining system in place to minimise the risk of transmission of the virus.

The Council will continue to explore further ways to make hard copies of documents available in line with government guidance at that time. All other consultation methods, such as the online communications, viewing and responding will not be affected.

With social distancing measures in place for the foreseeable future, Council officers will seek to use alternative methods of consultation to engage with the community and stakeholders. Face to face workshops, briefing sessions and drop-in events which have been used previously will not be appropriate at this time due to the risk of transmission to both officers and residents travelling outside of their homes. The Council will seek to use a variety of virtual consultation methods, where appropriate and practicable, such as video conferencing, virtual exhibitions, digital consultations and social media to reach out to the various groups within the local community.

Responding to Consultations

There will be no restrictions to responding to a Local Plan consultation. Responses will be welcomed via the online consultation portal, E-mail submission, or by post.

Whilst paper based submissions will be accepted, the public will be made aware that there may be delays to officers receiving and/or acknowledging submissions until this emergency period is over and normal office working is re-established.

Should anyone be unable to submit a response online or by email and be unable to leave their home to post a response, the Council will consider bespoke measures on a case by case basis to enable people to respond. Arrangements will be kept under review throughout consultations.

Neighbourhood Planning

The Council will continue to assist neighbourhood planning groups via online methods, however officers will not be able to attend group meetings or events as set out in paragraph 5.6.3 of the SCI until which time it is considered safe to do so.

Neighbourhood planning groups will be advised to defer Regulation 14 consultations if the Government impose national or local restrictions with regard to travelling outside of the home.

Neighbourhood planning groups will be recommended to defer Regulation 16 consultations Government impose national or local restrictions with regard to travelling outside of the home. Where groups express a clear resolution to continue with a Regulation 16 consultation, the Council will employ pragmatic steps to make the consultation period, advertisement in key locations that remain accessible, press release and printed elements provided on request.

All Neighbourhood plan referendums will be postponed until 6th May 2021, in line with The Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020. No alternative measures are possible.

The Council will provide advice to neighbourhood planning groups in relation to the above.

Financial Implications

Subject to the Covid-19 restrictions at the time of a public consultation, the Council may have to respond to requests from individuals or groups for hard copies of consultation material. These requests will be considered on a case by case basis. There may be costs incurred from printing and postage of hard copies of consultation material which may not have been incurred pre-Covid-19.

Failure to comply with the requirements of the Revised SCI (2018) could result in legal challenge relating to due processes not being carried out correctly. As a result, significant associated costs could be incurred.

RESOLUTION

Jason Longhurst, Strategic Director – Place, to the City of Bradford Metropolitan District Council, pursuant to Article 14.20 of the Constitution hereby resolve: -

1. **To suspend Paras 5.8.2 – 5.8.4 of the Council's Revised Statement of Community Involvement (SCI) (2018) insofar as it relates to the provision of hard copies of consultation documents at Council offices and local libraries until at least 31st December 2021 or [b] until which time the Council deems local libraries and Council**

offices be Covid-19 secure in line with the current Government guidance in order to open to members of the public.

2. **To suspend part of the Council's Statement of Community Involvement (SCI) insofar as it relates to the preparation of Neighbourhood Plans, and to be accompanied by the provision of associated advice to neighbourhood planning groups in relation to consultation on neighbourhood plans subject to [a] review in the event that government changes the requirements for social distancing and isolation relation Covid-19 within that period or [b] review on or before 31st December 2021.**

3. **To postpone all neighbourhood plan referendums until at least 6th May 2021, in line with The Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020.**

Dated this: 20th day of January 2021

Signed ....

On behalf of Jason Longhurst, Interim Strategic Director – Place

Signed ....

Councillor Ross-Shaw, Portfolio Holder – Regeneration, Planning and Transport

Appendix 1C: List of Statutory Consultees

1. List of Statutory Consultees (as specified under Regulation 25)

Statutory Consultees

- The Coal Authority
- Historic England
- Environment Agency
- Natural England
- Natural England – West Yorkshire Team

Specific Consultation Bodies and Infrastructure Organisations:

- British Telecom
- Highways Agency – Yorkshire & Humber
- Homes & Communities Agency
- National Highways
- National Gas
- National Grid
- Network Rail
- NHS Airedale, Wharfedale and Craven Clinical Commissioning Group
- NHS Bradford City & Bradford District Clinical Commissioning Group
- NHS England
- Telewest Communications
- The Coal Authority
- Transco (North of England)
- West Yorkshire Police
- West Yorkshire Police & Crime Commissioner
- West Yorkshire Police Crime Prevention
- Yorkshire Electricity

Adjoining Local Planning Authorities:

- Calderdale Metropolitan District Council
- Craven District Council
- Harrogate District Council
- Kirklees Metropolitan District Council
- Lancashire County Council
- Leeds Metropolitan District Council
- North Yorkshire County Council
- Pendle Borough Council
- Wakefield Metropolitan District Council

Town and Parish Councils in Bradford District:

- Addingham Parish Council
- Baildon Parish Council
- Bradford Trident Community Council
- Bingley Town Council
- Burley Parish Council
- Clayton Parish Council
- Cullingworth Parish Council
- Denholme Town Council
- Harden Parish Council
- Haworth, Cross Roads & Stanbury Parish Council
- Ilkley Town Council
- Keighley Town Council
- Menston Parish Council
- Oxenhope Village Council

- Yorkshire Water Services Ltd
- Mobile Broadband Network
- EE
- Mobile Uk
- Cornerstone British Telecom

Town and Parish Councils in Neighbouring Local Authority Areas:

- Bradleys Both Parish Council
- Cononley Parish Council
- Cowling Parish Council
- Denton Parish Council
- Draughton Parish Council
- Drighlington Parish Council
- Farnhill Parish Council
- Gildersome Parish Council
- Glusburn Parish Council
- Laneshaw Bridge Parish Council
- Middleton Parish Council
- Nesfield with Langbar Parish Council
- Otley Town Council
- Sutton-in-Craven Parish Council
- Trawden Forest Parish Council
- Wadsworth Parish Council
- Weston Parish Council
- Sandy Lane Parish Council
- Shipley Town Council
- Silsden Town Council
- Steeton with Eastburn Parish Council
- Wilsden Parish Council
- Wrose Parish Council

City of Bradford Metropolitan District Council - Elected Members 2019-2020:

- 90 CBMDC Councillors

Members of Parliament (MPs)

- Bradford East – Imran Hussain MP
- Bradford South – Judith Cummins MP
- Bradford West – Naz Shah MP
- Keighley – Robbie Moore MP
- Shipley – Philip Davies MP

Bradford District Local Plan & Call for Sites Consultation

View this email in your browser



Consultation Notification

Bradford District Local Plan - Preferred Options (Regulation 18) and Call for Sites

This e-bulletin is to inform you that the Council's new *Draft Bradford District Local Plan (Regulation 18)* with 'preferred options' for policies and site allocations is now published for consultation. Alongside this consultation, the Council has issued a Call for Sites.

The Bradford District Local Plan is a newly integrated single plan and takes into account comments which were received to the last consultation on the partial review of the Core Strategy along with new evidence to support the policies.

The Council welcomes your views on the emerging Bradford District Local Plan and Call for Site submissions.

The consultation is open from 9am on Monday 8th February through to 23:59hrs on Wednesday 24 March 2021.

Viewing Documents

The Bradford District Local Plan and supporting documents are available to view on the Council's new consultation software OpusConsult and OpusMaps consultation website here - Local Plan consultation system.

An interactive Call for Sites form is available from on the Local Plan consultation system.

Alternatively, a full suite of Print/PDF versions of the plan are available to view and download on the Council's main Planning Policy webpages and via: Bradford Council Consultations.

Due to the current pandemic. the consultation material will only be available online and paper copy documents will not be available in the usual deposit locations. We are however putting measures in place to improve accessibility to the plan with a special order request service for paper material for people unable to access digital material.

Online Events

The Local Plan Team is also hosting a series of online public and stakeholder information sessions covering planning policy topics and the proposed site allocations. This information will be available on the Council's website shortly.

Making Representations

We are encouraging you to use the consultation website to submit your comments about the plan, policy or site to ensure that the decisions we make are guided by a real appreciation of the views of the residents and people of the District.

You will need to register to use the OpusConsult system for the first time. Once registered, you will be able to draft, review and submit your comments at your convenience. Your comments will be stored as a record and you will be able to track the Council's response in due course.

Alternatively, if unable to use the consultation software then please set out your comment clearly stating which document, policy or site your representation refers to and submit the information to the Local Plan Team via:

Email to: planning.policy@bradford.gov.uk

Or post to: Local Plan Team, 4th Floor Britannia House, Broadway, Bradford, BD1 1HX

Further Information

If you are having trouble accessing the consultation website to submit your comments, please contact the Planning Policy Team for further guidance.

Our telephone information line is available for queries during office hours: 01274 433679

Also keep up to date and follow us on: Twitter and Facebook

Access the Local Plan Consultation system here



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Planning Policy
Website: www.bradford.gov.uk/planningpolicy
Email: Planning.Policy@Bradford.gov.uk
Phone: 01274 433679

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Appendix 1E: Press Notices – Regulation 18

Telegraph & Argus – 9 February 2021

2/9/2021 Hundreds of possible housing sites proposed as Bradford plans for next 15-20 years | Bradford Telegraph and Argus

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Telegraph & Argus

News Sport Business Opinion What's On Nostalgia Announcements Stay Informed and Stay Safe

News

Hundreds of possible housing sites proposed as Bradford plans for next 15-20 years



By Chris Young | @ChrisY_TandA
Local Democracy Reporter



29 comments

A NEW document has revealed the likely location for where tens of thousands of new homes in the Bradford District will be built by 2038.

Bradford Council yesterday began a public consultation on its Local Plan, a document that will map out sites where housing should, and should not, be built.

The hefty document, which runs into hundreds of pages, also includes locations for future employment sites.

The number of homes planned for Bradford city centre is higher than in early drafts of the plan, and proposals to build thousands of homes to the South East of the District seem to have been scaled back slightly.

A local plan is a document that allocates sites that will be used to meet Government appointed housing targets, and helps shape planning decisions for years to come.

Bradford has been without an up to date local plan for years, and the current housing target for the District is around 1,700 homes a year.

Until 2019 it was 2,476 - but a change in Government policy led to Bradford Council re-drawing its targets.

T&A

As well as 325 housing sites, the plan also includes 80 hectares of employment land and the designation of 1,693 open spaces - totalling 2,781ha of land.

https://www.thetelegraphandargus.co.uk/news/19074715.hundreds-possible-housing-sites-proposed-bradford-plans-next-15-20-years/ 1/3

More Greenbelt land may be spared as fewer houses needed under revised Bradford local plan

however, in the latest plan that has significantly increased to 7,000 homes, with around 2,500 of these located in the "Southern Gateway" to the city.

One of the most controversial aspects of the early drafts of the plan was a proposal to build 2,500 homes in the Tong Valley to the East of Holme Wood, much of which is Green Belt land.

The plan says that the allocation for this area has been reduced - now 2,126 need to be built across the entire South East Bradford area.

However, the plan says Green Belt land is still likely to be allocated for around 1,447 homes - including 296 on sites off Ned Lane and 1,158 to the north of Westgate Hill Street.

Keighley town centre is another area where a large number of sites will be allocated, with a focus on the town centre and vacant sites near Keighley Rail Station.

Once a local plan is adopted, it makes it more difficult for developers to gain planning permission to build on sites that are not allocated for housing or employment.

However, if a site is allocated for such a purpose, it makes it more difficult for the Council to refuse planning applications for those sites.

Members of the public are now able to have their say on the proposed sites - although some Councillors have questioned how effective the virtual consultation will be.

Sites allocated for housing in the plan include:

BRADFORD CITY CENTRE

Former Royal Mail site on Valley Road - the land had recently been earmarked as a major leisure development, but under the new plans could accommodate up to 300 homes

Former Bee Hive Mills site between Smith Street and Thornton Road - a vacant site that up to 200 homes could be built on

Thornton Road South - a former foundry site that could accommodate 300 homes.

SHIPLEY

Land off Glenview Drive, Bankfield Road, Nab Wood - a 6.2 Hectare site that could be allocated for 164 homes.

HMRC site off Salts Mill Road - the site will soon be vacated by HMRC and could accommodate 266 homes.

BINGLEY

Coolgardie on Keighley Road - up to 135 houses could be allocated to the agricultural site

Sty Lane - a site that already has outline planning permission for 440 houses

BAILDON

A greenfield site North of West Lane could accommodate 46 homes

COTTINGLEY

The village's entire 150 home allocation could be accommodated on a single Green Belt site - off Marchcote Lane. A hugely controversial planning application for 155 homes on the site is currently going through the planning process.

KEIGHLEY

T&A

Braithwaite Avenue/North Dean Road - a former Primary School site that up to 173 homes could be built on.

ILKLEY

Ben Rhydding Drive, Wheatley Grove - 130 homes could be allocated for this site

Coutances Way - pasture land that up to 155 homes could be b[illegible] on

[illegible] area - Sun Lane (500) and the Scalebor House site on Moor Lane (110).

Councillor Alex Ross-Shaw, Bradford Council's Executive Member for Regeneration, Planning and Transport, said: "This is a key milestone in the development of the Local Plan which sets out the proposals for the growth and sustainability of the district over the next 15 to 20 years.

"The development of the Local Plan is important for all communities right across the district. The consultation is the first step of a key part of the process. We need to know what elements of the plan that people like and support as well as any concerns, so I would encourage everyone to make their views known via the consultation."

Councillor Sarah Ferriby, Portfolio Holder for Healthy People and Places, said: "Sustainable development and climate action are two of our key priorities for the future of the district, so the inclusion of measures to help us live in a greener, cleaner way with lower carbon emissions is vital for us to make the necessary progress to be net zero by 2038. We also have to lay the foundations of a green economy to ensure that living and working sustainably can benefit as many people as possible."

After the consultation was launched, Conservative Councillor Jackie Whiteley said: "The Conservative group are concerned at the assertion that Bradford Council makes that 20 per cent of homes during the plan period will need to be built on Green Belt Land.

"We would like to know why the Council cannot use its contribution from the Government Award to West Yorkshire (£67 million) to make Brownfield sites viable to alleviate the need to use Green Belt"

She also questioned whether people without internet access would be "seriously disadvantaged" when it came to taking part in the consultation.

Councillor Jeanette Sunderland, leader of the Liberal Democrats on Bradford Council, said: "If the Covid pandemic has taught us anything it is that clean air, clean water and open spaces are our most valuable assets. For us the plan needs to do no harm to people, places or the planet. We will be concentrating on looking at policies to meet local needs and how the plan can be focused to increase biodiversity across the district and make more space for nature.

"Alongside this we recognise the council needs to build houses for people to live in. The Council needs to do more to provide good quality, environmentally sound properties that people can afford to live in with enough space around them for people to enjoy and gardens for children to play in."

She added: "It disappointing that the Council is launching such an important consultation at a time when people cannot get together to discuss the issues. This means that it is really difficult for people to make their views known on what is the most important tool to improve the future of our health and that of the planet."

Independent Councillor for Ilkley Anne Hawksworth said the number of houses allocated for Ilkley seemed to have been reduced, but criticised the sites chosen.

She also raised concerns over the consultation process, saying: "Sadly under the current lockdown and restrictions on life important items such as this which would normally have full public consultation in a wider areas.

"It is not possible currently and so there is the danger of permissions being just nodded through without full Public scrutiny. It could be said that democracy is one of the Covid Casualties."

To take part in the consultation, and to see the full list of sites, visit https://bradford.oc2.uk/document/20.

People can phone 01274 433679 during office hours or email planning.policy@bradford.gov.uk. The online consultation closes on 24 March.

Ilkley Gazette – 8th February 2021

NEWS

8th February

Reader letter: "Burley-in-Wharfedale disproportionally burdened" in district's local housing plan

By Claire Lomax



Philip Davies MP and Cllr Jackie Whiteley at Sun Lane, Burley-in-Wharfedale

MOST READ COMMENTED

0 comment

SIR - Bradford Council proposes that 21% of all homes built between 2020-2038 will be built on Green Belt! Burley-in-Wharfedale disproportionally burdened.

Bradford Metropolitan District Council begins its consultation on its proposed Local Plan for the period 2020-2038 on 8th February. Of the 30,672 homes to be built in the period (1704 dwellings per annum). Bradford Council says that 21% of homes will have to be built on Green Belt despite discounting some Brown Field sites. Surely these sites should be made viable before making a devastating inroad into our beautiful Yorkshire landscape? Furthermore, landowners are to be encouraged to come forward with new sites for housing.

Where does that leave my ward, Wharfedale Ward? Extensive building has begun on greenfield sites in Menston. The land was reclassified in the late 90s by a Government Inspector despite huge local opposition. Building has begun and may count towards the 350 houses in the proposed Local Plan.

MENU

house numbers significantly reduced, Burley's has not. We have to ask the question why have the figures been skewed in such a was as to put the burden disproportionately on Burley in Wharfedale? The Sun Lane application may be the answer. The Secretary of State called in Bradford Council's planning decision and turned the application down. The developer, (ceg) and Bradford Council then

https://www.ilkleygazette.co.uk/news/19073065.reader-letter-burley-in-wharfedale-disproportionally-burdened-districts-local-housing-plan/ 1/3

challenged the decision in the High Court and won. The Secretary of State is now reconsidering the application to see whether there are further arguments to refuse the application and his decision is due soon.

on. Ground water flooding on the site, together with the harm to wildlife habitats were amongst the points raised. We also know that the lack of infrastructure would change the nature and shape of Burley-in-Wharfedale community. It is secondary school places that are in shortest supply with Ilkley Grammar School unable to expand further and schools across the border in the Leeds District are reducing their catchment areas to cater for students coming from new builds in the local Leeds District. Many readers will remember that Bradford Council said they will always supply school places even if children must travel to Keighley or into Bradford. I doubt local people feel that option is either good or viable and there are many more arguments against the Sun Lane development.

Bradford Council and ceg have also been able to put further arguments to the Secretary of State and the numbers in the proposed local plan will have been presented. It looks to me that the figures have been fudged to fit the Sun Lane development, otherwise what could account for such a disproportionate reduction of housing numbers across the District?

The Consultation opened on 8th February and closes on 24th March. All documents are available on Bradford Council's Planning pages City of Bradford Metropolitan District Council - Draft Bradford District Local Plan - Preferred Options (Regulation 18) February 2021 (oc2.uk) and ALL consultation responses will be made on line via OPUS Connect. No doubt this will disadvantage those people who are not IT confident.

It is vitally important that as many people as possible make their comments to Bradford Council.

Yours faithfully

Cllr Jackie Whiteley

District Councillor (Con)

Wharfedale Ward

0 comment

BRADFORD DISTRICT LOCAL PLAN (2020 TO 2038): PREFERRED OPTIONS

NEWS ARTICLE LINKS

1. **8th February 2021 - Bradford Zone**
   (Weblink) Greens warn housebuilding plans for Tong Valley could lead to more flooding in West Leeds

2. **8th February 2021 – Ilkley Gazette**
   (Weblink) Reader letter: "Burley-in-Wharfedale disproportionally burdened" in district's local housing plan

3. **9th February 2021 - Telegraph and Argus**
   (Weblink) Hundreds of possible housing sites proposed as Bradford plans for next 15-20 years

4. **9th February 2021 – Yorkshire Post**
   (Weblink) Housing plans could see over 200 homes built on Green Belt land in Ilkley prone to flooding

5. **10th February 2021 – Ilkley Gazette**
   Fears for Wharfedale's green belt as housing plan is published
   (Weblink) Fears for Wharfedale's green belt as housing plan is published

6. **11th February 2021 – Telegraph and Argus**
   (Weblink) 'Horrified' district councillors unite to call town meeting in the face of green belt housing plan for Ilkley

7. **11th February 2021 – Ilkley Gazette**
   (Weblink) 'Horrified' district councillors unite to call town meeting in the face of green belt housing plan for Ilkley

8. **15th February 2021 - Telegraph and Argus –**
   (Weblink) Over 2,000 possible housing sites were looked at when drawing up local plan

9. **16th February 2021 – Keighley News**
   (Weblink) Fears over Oakworth greenfield site as draft Local Plan is unveiled

10. **15th February 2021 – The Planner**
    (Weblink) Bradford posits green belt-tightening in local plan to meet homes quota

11. **12th February 2021 – Ilkley Gazette**
    (Weblink) Ilkley Green campaigner's plea to residents on 'heartbreaking' green belt homes plan

12. **12th February 2021 – Wharfedale Gazette**
    (Weblink) Ilkley Green campaigner's plea to residents on 'heartbreaking' green belt homes plan

13. **16th February 2021 – Telegraph & Argus**
    (Weblink) Fears over Oakworth greenfield site as draft Local Plan is unveiled.

14. **22nd February 2021 – Keighley News**
    (Weblink) Silsden and Steeton-with-Eastburn residents urged to have their say over Local Plan

15. **22nd February 2021 – Ilkley Gazette**
    (Weblink) Reader letter: Ilkley facing two huge challenges

16. **24th February 2021 – Telegraph & Argus**
    (Weblink) Ilkley residents urged to have their say on green belt homes plan

17. **24th February 2021 – Ilkley Gazette**
    (Weblink) Ilkley residents urged to have their say on green belt homes plan

18. **11th February 2021 – Bradford Zone**
    (Weblink) Local Plan for Bradford sets out how the district aims to grow sustainably over the next 15 to 20 years

19. **5th March 2021 – Telegraph and Argus**
    (Weblink) Council says it will not extend its Local Plan consultation, despite concerns it could disenfranchise some residents

20. **1st March 2021 – Telegraph & Argus**
    (Weblink) Which city centre sites have been allocated for housing in Bradford's Local Plan?.

21. **3rd March 2021 – Ilkley Gazette**
    (Weblink) Call to protect Addingham's green belt from housing

22. **5th March 2021 – Telegraph and Argus**
    (Weblink) Online sessions held for Local Plan consultation

23. **5th March 2021 – Ilkley Gazette**
    (Weblink) Reader letter – Local Plan consultation is frankly a farce

24. **5th March 2021 – Wharfedale Observer**
    (Weblink) Reader letter – Local Plan consultation is frankly a farce

25. **7th March 2021 – Telegraph and Argus**
    (Weblink) Robbie Moore slams Bradford Council's housing plans

26. **9th March 2021 – Keighley News**
    (Weblink) Local Plan public information sessions being stages online

27. **28th February 2021 – Keighley News**
    (Weblink) Fears for green belt site at Oakworth

28. **16th February 2021 – Keighley News**
    (Weblink) Fears over Oakworth greenfield site as draft Local Plan is unveiled

29. **28th February 2021 – Keighley News**
    (Weblink) Local Plan: Keighley West residents urged to have their say

30. **25th February 2021 – Yorkshire Post**
    (Weblink) The green belt in places like Bradford district is under 'extreme and sustained pressure', says countryside charity CPRE

31. **10th March 2021 – Ilkley Gazette**
    (Weblink) Ilkley Town Council concerned residents are unaware of Local Plan consultation

32. **10th March 2021 – Wharfedale Observer**
    Ilkley Town Council concerned residents are unaware of Local Plan consultation
    https://www.wharfedaleobserver.co.uk/news/19149023.ilkley-town-council-concerned-residents-unaware-local-plan-consultation/

33. **22nd February 2021 – Craven Herald & Pioneer**
    (Weblink) Silsden and Steeton-with-Eastburn residents urged to have their say over Local Plan

34. **2nd March 2021 – Bradford Zone**
    (Weblink) Bradford Council's consultation on its Local Plan continues with online public information sessions

35. **12th March 2021 – Keighley News**
    (Weblink) Local Plan: Keighley East consultation

36. **22nd February 2021 – West Leeds Dispatch**
    (Weblink) Tong and Fulneck Valley green belt campaigners launch appeal to fund legal fight

37. **2nd March 2021 – West Leeds Dispatch**
    (Weblink) Green belt campaigners seek volunteers for tree survey of ancient woodland

38. **9th February 2021 – Rombalds Radio**
    (Weblink) Local plan shows how Ilkley, Silsden and Keighley will grow sustainably over the next 2 decades

39. **2nd March 2021 – Rombalds Radio**
    (Weblink) Local Plan online public information sessions

40. **18th March 2021 – Telegraph & Argus**
    (Weblink) Bid to extend Local Plan consultation into the Summer fails

41. **18th March 2021 – Telegraph & Argus**
    (Weblink) LOCAL PLAN: Brontë expert urges Bradford Council to preserve Thornton fields

42. **18th March 2021 – Telegraph & Argus**
    (Weblink) LOCAL PLAN: Shipley residents on 'Save Wycliffe Green Space'

43. **18th March 2021 – Ilkley Gazette**
    (Weblink) Bid to extend consultation on vital planning blue print fails

44. **17th March 2021 – Ilkley Gazette**
    (Weblink) "Have your say, just don't expect those views to make the slightest difference"

45. **17th March 2021 – Wharfedale Observer**
    (Weblink) "Have your say, just don't expect those views to make the slightest difference"

46. **22nd March 2021 – Telegraph & Argus**
    (Weblink) Where thousands of homes could be built in the North West of Bradford

47. **22nd March 2021 – Telegraph & Argus**
    (Weblink) Final plea for Local Plan consultation to be extended

48. **23rd March 2021 – Telegraph & Argus**
    (Weblink) Campaigners in fight to get Green Belt sites removed from Local Plan

49. **22nd March 2021 – Bradford Zone**
    (Weblink) Still time to have your say on the Local Plan for the Bradford district

50. **16th February 2021 – Sunrise Radio**
    (Weblink) Local Plan for Bradford sets out how the district will grow sustainably over the next 15-20 years

Plan-it Bradford Newsletter - February 2021

View this email in your browser



Plan-it Bradford Newsletter - February 2021

Providing the latest information on planning within the Bradford District.

Welcome to the first newsletter edition of 2021!

Within the context of local planning there has been significant changes and updates since our last newsletter and this is an opportunity to bring you up to date with our progress.

There are three public consultations which you may wish to be aware of that start today - Monday 8th February. Further details of these are provided in this newsletter and relate to the following planning documents:

- **Draft Bradford District Local Plan**
- **Call for Sites**
- **South Pennine Moors Supplementary Planning Document (SPD)**

Bradford District Local Plan - Shaping the future of the District

The Bradford District Local Plan is changing and simplifying. The Council is combining work on the Core Strategy review and emerging site allocations together with other local plan documents, including a review of the adopted Area Action plans (City Centre and Canal Road Corridor), plus the Waste Management Development Plan Document into a single plan format.

Nationally it is clear that Government, through its White Paper consultation in 2020 (Planning for our Future), is concerned with simplifying plan making.

The new integrated Local Plan sets out a clear spatial direction for the District and an opportunity to align with new national planning directions as they arise. The work has been challenging but has also been driven by the need to:

- **Refocus our direction** at the strategic level to embed growth and development within the context of the climate emergency.
- **Identify clear local area strategies,** which take into consideration not just new sites for housing and employment, but also what makes places special.
- **Refresh our planning focus** for Bradford City Centre linked to infrastructure investment opportunities and new master planning.

The structure of the draft Local Plan is wide ranging but divided into four broad areas:

- **strategic policies** on issues such as sustainable development, housing and employment land requirements and strategic policies to shape the District including climate change;
- **thematic policies** on topics such as housing, employment and the environment;
- **site allocations** for the Regional City areas and settlements within the district; and
- **policies on delivery, infrastructure and viability.**

Public consultation

The Draft Bradford District Local Plan (Regulation 18) is published for public consultation today (Monday 8th February), with consultation running to Wednesday 24th March 2021.

Due to the current restrictions from the Covid-19 pandemic, the Council's consultation activity and events will be online only with all consultation material being available on the Council's OpusConsult consultation website. This is in line with the Governments updated regulations relating to the availability of documents.

The provision of paper copies will not generally be available, although exceptions will be considered by the Council on a special order request basis. Special requests should be made to the Planning Policy Team directly using the contact details below.

The Council has issued a temporary suspension notice in relation to the Revised Statement of Community Involvement (SCI) (2018) to take account of these temporary changes to consultation arrangements. This is available to view on the SCI webpage.

Notifications

If you have received this e-newsletter to your inbox, you will receive further updates on the consultation including on-line events to discuss the planning policies and sites contained within the new plan.

If you have received this from a third party or viewed it on our website and would like to receive your own updates, please register your email address to receive Planning Policy e-bulletins on our Stay Connected system.

Call for Sites Consultation

Alongside consultation on the Local Plan, the Council is issuing a Call for Sites process – this relates to site submissions at this stage for:-

- Residential sites particularly within the Regional City of Bradford
- Sites for minerals extraction.
- Sites for waste disposal / recycling.
- Sites for Gypsy and Traveller Pitches.
- Sites for Renewable Energy (solar and wind primarily).
- Custom and Self Build Housing Sites.
- Specialist Housing and Accommodation Sites.

The Call for Sites submission form is available via the OpusConsult consultation website.

We are encouraging forms to be filled in and submitted online along with any plans or evidence which you may wish us to considered. Mapping software (OpusMaps) will be available to produce your own site boundary for submission.

Further details regarding the Call for Sites is available on the Planning Policy webpages.

Please note that we are only looking for new site suggestions, so if you have already submitted a site to us, the outcome of our assessment will be published as part of the Local Plan consultation. You will not need to re-submit the site to us.

South Pennine Moors Supplementary Planning Document (SPD)

Bradford Council has produced a new South Pennine Moors Supplementary Planning Document (SPD). The SPD relates to the South Pennine Moors, which are internationally protected, being classified as a Special Protection Area (SPA) and designated as a Special Area of Conservation (SAC).

The purpose of the guidance will be to provide the information necessary to enable planning officers and developers to understand necessary steps to ensure compliance with the *Conservation of Habitats and Species Regulations 2017 (as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019) ('the Habitats Regulations')*.

This SPD also sets out a recommended developer contribution that would contribute to the avoidance or mitigation of adverse impacts on internationally protected species and habitats that arise from development within the Bradford District.

Public consultation on this document also starts today (Monday 8th February) and runs to Wednesday 24th March 2021. We would like to hear your opinions and views on the new SPD. The consultation document is also published on our new OpusConsult website where you can view and submit your comments.

OpusConsult: New public consultation software

opusconsult

The Local Plan Team has launched a new consultation website in time for the Local Plan consultation.

OpusConsult will make the process of commenting on a document a lot simpler and more efficient. Comments can be made against each major part of the plan whilst reading it and are stored within your profile as a record.

The system is fully GDPR compliant and your personal data will only be used by the Council for the purposes of producing the Local Plan.

We recommend that you use OpusConsult to view and comment on the Local Plan.

Local Development Scheme

The Local Development Scheme (LDS) is in the process of being revised and formally agreed to reflect the new direction and timetable for plan production. A technical note setting out the key directions will be available on the Council's website shortly with the revised LDS on the Council's Executive work programme for later this year.

Neighbourhood Planning Update

Within the Bradford District there are 12 designated Neighbourhood Areas producing Neighbourhood Development Plans (NDP). Each Town, Parish or Village Council are working with their local community to produce a Neighbourhood Plan.

In recent months two Neighbourhood Plans have passed the Examination stage and are now awaiting a local Referendum to allow the local communities to decide if these plans should be approved; these are:

- Steeton-with-Eastburn & Silsden; and
- Haworth, Cross Roads and Stanbury.

All Neighbourhood Planning Referendums have been suspended until after May 2021 due to the Covid-19 pandemic. The Council will make steps to ensure that these local referendums can take place as soon as it is possible to carry these out. Read more

Evidence Base Update

It is essential that the Local Plan is based upon up-to-date and robust evidence to underpin the approach and policies within the Plan.

The Council has produced and/or commissioned the following evidence documents which will be published as part of the Local Plan consultation and will be available for comment: -

- Bradford District Local Infrastructure Plan
- Bradford District Open Space Needs and Demand Audit
- Bradford District Open Space Assessment
- Bradford District Selective Green Belt Review

- Bradford District Site Assessment Methodology and Report
- Bradford District Strategic Land Assessment
- Bradford District Updated Demographic Evidence
- Duty to Cooperate Action Plan
- Employment Needs Assessment and Land Review (ENALR)
- Flood Risk Technical Note
- Future Employment Analysis (ENALR) Addendum
- Five Year Housing Land Supply Statement
- Gypsy and Traveller Needs Assessment
- Heritage Impact Assessments Note and Assessments
- Local Insights - Area and settlements guides
- Local Plan and CIL Financial Viability Assessment
- Minerals Background Paper
- Retail and Leisure Study (2019)
- Strategic Housing Market Assessment - Update



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Appendix 2: Summary of Representations and Council's Response

The consultation document contained 144 consultation questions which were linked to policies, Local Area Strategies and proposed sites with the draft Local Plan. This appendix section sets out a summary of the comments received and the council's response to those comments where relevant and appropriate. These are presented in plan order as set out in the table below.

2.1	Plan Period	
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	Strategic Policies	
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2.37	Policy HO7	Specialist Housing and Accommodation
2.38	Policy HO8	Sites for Gypsies, Travellers and Travelling Showpeople
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2.71	Bradford North East	

2.72	Bradford South East
2.73	Bradford South West
2.74	Bradford North West
2.75	Canal Road Corridor
2.76	Shipley
2.77	Baildon
2.78	Bingley
2.79	Cottingley
2.80	East Morton
2.81	Keighley
2.82	Silden
2.83	Steeton-with-Eastburn
2.84	Addingham
2.85	Burley-in-Wharfedale
2.86	Ilkley
2.87	Menston
2.88	Cullingworth
2.89	Denholme
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	Appendices
2.100	Appendices
	Policies Map
2.101	Policies Map
	Impact Assessments
2.102	Sustainability Appraisal & Strategic Environmental Assessment
2.103	Habitats Regulations Assessment (HRA)
2.104	Equality Impact Assessment (EqIA)
	Supporting Documents
2.105	Evidence Base reports

2.1 PLAN PERIOD

Overview

The adopted Core Strategy plan period currently runs from 2013 and covers the 17-year period to 2030. National planning policy indicates that strategic policies should look ahead over a minimum 15-year period from adoption. The proposed plan period allows for a 17- year plan length and a forward view on strategic policies of 15 years from the date of anticipated adoption in 2023. A revised plan period of 2020-2038 is proposed.

In total, **180** representations from **180** respondents were submitted in relation to the Plan Period. These were received from local residents, landowner, developers, agents, businesses, a charity, a community centre, a Parish Council and the Chamber of Commerce.

Table 2.1: Question 1: Plan Period - Summary of Representations Received

Consultation Question 1 – Plan Period				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
180	**180**	**159**	**16**	**5**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Limited support for the proposed plan period • Location of development focuses too much on the Green Belt • Consultation process and timescales • Impact of Covid-19 on the consultation • Timescale of Local Plan Review and impact of 2021 Census • Green Belt development in South East Bradford • Plan period and forecasting future development requirements • Base data underpinning the plan • Length of the plan period and plan preparation of time • Clarification of the plan period length • Plan period and timescales for plan production	The Council has reviewed the multiple representations made on the plan period and they have been considered when determining what the new plan period will be. The Regulation 19 Publication Draft has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance. The plan period for the Regulation 19 Publication Draft has been revised and updated to 2025-2043.

• Need for genuinely strategic approaches • Delivering the housing requirements • Alignment with the Bradford Economic Strategy is needed • Addressing past under-delivery • Timescale for Local Plan Review – no less than 5 years	

Summary of Representations
Objections:
1. Location of development: • Plan focuses too heavily on Green Belt development and not enough on brownfield land. • Area has large areas of brownfield sites in urban centres that required investment. • However, the plan was to overdevelop areas that have over-subscribed schools and poor public transport infrastructure. • Such development would add nothing to local areas, destroy wildlife and blight the landscape. Would be irresponsible development.
2. Local Plan consultation process/timescales: • Objection to consultation taking place during a lockdown period.
3. Understanding the impact of the COVID-19 pandemic: • A longer plan period of 2020 to 2020 would be supported. • Will take potentially two years to understand what the world may look like in the post-pandemic period. • May result in significant changes to working practices, e.g. working from home, which could impact on may aspects of the Local Plan. • The Plan will need to be shaped to fit around a “new normal”.
4. Timescale of Local Plan Review and impact of 2021 Census: • Noted that plan period was proposed to run for seventeen years, opposed to the normal fifteen, • Means that forecast methods used to inform the plan would be extended by an extra five years. • Suggested that the Local Plan’s progress be scheduled for a review no later than five years before the plan period ends. • Also recommended that the plan be reviewed when the 2021 Census data is released in 2022 as it may reveal something significant regarding housing or jobs in the District.

- The was particularly the case if the Council were to progress with a plan based on the 2021 Five Housing Land Statement and the Housing Need Addendum.

5. Consultation and taking account of the pandemic:

- Consultation did not take into account of changes since the start of the pandemic. Should have waited until the lockdown period was over.

6. Green Belt development in South East Bradford:

- Object to development in Green Belt in SE Bradford, in particular the Tong area.
- No views sought by Council from the community. Most disagree with housing and road plans.
- Would directly affect a Grade II Listed Building.
- Council does not care about the environment and animals that need it.

7. Plan period and forecasting future development requirements:

- Suggested plan period considered inappropriate.
- It disregarded development that had already taken place in previous iterations of the Core Strategy.
- Did not recognise the impossibility of determining housing and employment needs so far into the future, particularly in the light of fundamental shifts resulting from the COVID-19 pandemic.

8. Base data underpinning the plan:

- Noted that the plan refers to the COVID-19 pandemic and the detrimental impact on economic differences and social inequalities.
- Data used to underpin the plan was considered to be old. Recommended that it would be sensible to base it on more up to date data that will be provided by the 2021 Census.
- Acknowledged that the impacts of the COVID-19 pandemic would not be known for some time, however basing the plan on “old” data presented significant risks.
- Queried whether the Whole Plan Viability Assessment would take the age of base data into account.

9. Length of the plan period and plan preparation of time:

- Suggested that the plan period be extended to 2040, resulting in a 20 year plan.
- Highlighted that the Core Strategy accounted for housing needs between 2004 and 2030 (a 26 year period) and sought to plan for new homes needed between 2013 and 2030 with an Allocations DPD expected to adopted in 2020 giving a 10 year period where there would be complete housing policy coverage.
- Demonstrated that plan preparation takes a long time and as such once a plan is prepared and adopted it should cover a considerable period of time.

- A 20 year plan period would mean plenty and scope and flexibility could be built into the plan to more pressing needs should these arising in the interim and before a full review could be completed.

10. Clarification of the plan period length:

- Suggested that the plan period actually covers an 18 year period rather than a 17 year period, based on the average dwelling per annum figure set out in Policy SP8.
- Recommended that clarity be provided on how the 2020 to 2038 period was calculated to result in a 17 year period.

11. Length of plan period:

- Identified plan period (2020 to 2038) was insufficient.
- Due to acknowledged slippage in plan preparation, it was viewed as being prudent to build in additional flexibility to allow for any further delays.
- Suggested that the plan period be extended to 2040 to provide flexibility and to ensure that it would look ahead over the minimum 15 year period for any potential adoption date.

Support:

1. Plan period and timescales for plan production:

- The plan period (2020 to 2038) and the need for having a 15 year period from the date of adoption was supported.
- Suggested that due to the time taken to reach the Regulation 18 stage and anticipated adoption date of 2023, plan production should be sped up, in particular to address shortfalls in housing and employment land supply.

2. Provision of infrastructure to support development:

- Plan period allows for the planning of support and amenities for new housing development.
- Provision of school places along with medical facilities and local amenities could be planned and timed to reflect timing of new development, meaning that would be put in place when they were needed.

3. Plan period:

- The overall plan period was considered to be acceptable, however the overall plan proposals were not necessarily endorsed.

4. General support:

- There was general support for the proposed plan period.
- The seventeen year plan length was considered to be appropriate given its ambitious nature and the pandemic.
- Also considered to be a sensible approach and would meet the minimum period required by national policy.

5. Need for genuinely strategic approaches:

- 15 years was considered a long enough period to introduce some genuinely strategic approaches to planning.
- The current approach was seen as mainly reactive without any attempt to alter trends that could render Bradford an appalling place to live.
- Two strategies could be introduced – one which makes clear the consequences of population growth and encourages families of 1 or 2 children as a maximum, and another the tackles mental health issues.
- In respect of the latter, it was recommended that the Council becomes familiar with research on the benefits of contact with the natural environment.
- Surviving green space must be preserved and expanded. Would also halt declining biodiversity.

6. Delivering the housing requirement:

- Decision not to adopt the new Government Standard Method including the 35% urban uplift above the base housing requirement of 1,704 dwellings per year was supported.
- Council's approach to the plan period was also supported.
- Noted that there was considerable uncertainty over how the District would look post-COVID, as such the measured and sensible proposal put forward in the plan was supported.

7. Plan period and controlling location of development:

- The plan period was considered to seem reasonable and would help businesses to forecast their future requirements.
- Council will need to ensure that agents/developers do not cherry pick the most lucrative and easy Green Belt/greenfield sites before previously developed land/brownfield sites.
- Considered that identifying sites for development late in the plan period would leave the Council open to challenge due the back stop of a lack of a five year housing land supply.
- Previously developed land in Bradford and Keighley should be prioritised for development first to support those settlement retail offerings.

8. Addressing past under delivery of housing:

- The proposed 17 year plan period with a start date of April 2020 and end date of 2038 was supported, subject to the Plan's housing needs and requirement figures fully recognising past under delivery.

Comments

1. Timescale for Local Plan Review:

- No objections to the proposed plan period (2020 to 2038), however it was considered essential that the Plan be reviewed no less frequently than every five years.

- Proposed that site allocations are reviewed on a five yearly basis to minimise the risk of surplus Green Belt releases being included. Would mean that the Council would not be able to show exceptional circumstances at present for Green Belt site allocations.
- May be the case that after the first five years, the Council could show exceptional circumstances due to changes in housing growth predictions. Would mean that Green Belt land would not be lost any sooner than absolutely necessary.

2. Alignment with the Bradford Economic Strategy:

- The new Local Plan's introduction did not mention the Bradford Economic Strategy as one of the local strategies that it seeks to align to.
- Was a concern not only as the Council were involved in its preparation, but that the locally agreed economic aspirations were not clearly reflected in the Local Plan.

3. Lack of consultation:

- Plan had a short lead in period with very little consultation.
- Highlighted that many residents in Shipley and surrounding areas were not IT literate or did not have access to digital means. As such, recognition should be given to the fact that the extent of submission on the Plan would have been significantly reduced.
- Suggested that additional consultation mediums, e.g. questionnaire door drops and door knocking, could have been used to give all residents the opportunities to express their views and make the process seem fair, given the fact that plan was issued at entry to a lockdown period.

4. Length of Plan Period:

- Suggested the plan period should be extended to 2040.
- Would provide flexibility and ensure that the plan looks ahead over a minimum of 15 years from a potential adoption date.

5. Addressing past under-delivery:

- No objection to the proposed plan period.
- Concerns expressed over a continued and longstanding issue of under-delivery of new homes, which needed to be accounted for in the emerging Local Plan.
- This issue was evidenced by not being able to demonstrate a five-year supply of housing land and a failure to meet the Housing Delivery Test.

Representation IDs:

1071, 1099, 1191, 1281, 1872, 1902, 2110, 2538, 2616, 2729, 2830, 3420, 3668, 3768, 3863, 4740, 4970, 5640, 5843, 10933, 11367, 13813, 16257, 16870, 17161, 17167, 17407, 17493, 17671, 18916, 18926, 18936, 18946, 21785, 21877, 21906, 21935, 21964, 21993, 22022, 22054,

22083, 22112, 22141, 22181, 22210, 22239, 22268, 22297, 22326, 22355, 22466, 22495, 22524, 22553, 22591, 22620, 22649, 22678, 22707, 22736, 22780, 22809, 22847, 22876, 22905, 22934, 22963, 22992, 23021, 23050, 23106, 23135, 23164, 23193, 23222, 23251, 23280, 23309, 23338, 23367, 23396, 23425, 23600, 24112, 24156, 24195, 24308, 24337, 24366, 24395, 24426, 24455, 24540, 24569, 24618, 24693, 24731, 24760, 24838, 24925, 24954, 24983, 25013, 25043, 25077, 25128, 25157, 25175, 25182, 25211, 25423, 25472, 25701, 25730, 25759, 25788, 25817, 25846, 25875, 25904, 25933, 25962, 25991, 26020, 26049, 26078, 26107, 26136, 26165, 26194, 26223, 26252, 26282, 26317, 26346, 26559, 26674, 26706, 26749, 26792, 26821, 26850, 26879, 26908, 26939, 26968, 27000, 27029, 27058, 27111, 27140, 27169, 27198, 27227, 27259, 27288, 27317, 27346, 27375, 27404, 27433, 27466, 27540, 27555, 27680, 27714, 27787, 27818, 27882, 28181, 28271, 29204, 29557, 29597, 29700, 29996, 30077, 30143, 30160

2.2 SPATIAL VISION

Overview

Central to the Local Plan for Bradford District is the long-term spatial vision that provides the framework for the development of the policies within the plan. The vision was carried forward from the Core Strategy and included a revision only to the plan period.

In total, **3** representations from **3** respondents were submitted in relation to the Spatial Vision. These were received from a landowner (and agent), and two Government bodies (Environment Agency and Historic England).

Table 2.2.1: Spatial Vision - Summary of Representations Received

Comments on the Spatial Vision				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
3	**3**	**0**	**3**	**0**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • General support • Addressing the historic environment • Addressing the water environment	The Council has reviewed the representations made on the Spatial Vision and these have been considered in the justification and drafting to the revised Spatial Vision in Section 2 of the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
No objections were received in relation to the Spatial Vision
Support:
1. General support:

• The parts of the vision relating the growth of the District, including the towns and settlements in the Airedale area, particularly East Morton was supported. All of these settlements have been supported by a significant increase in the delivery of new homes.
2. Addressing the historic environment: • Historic environment was noted as making a significant contribution to the distinctive character of Bradford District, its economic wellbeing and quality of life of its communities. • Viewed as essential for the Plan to set out a robust framework to manage it, address potential threats to assets and how the District's historic buildings/areas might be used positively to deliver the wider objectives of the Plan. • Vision was supported, particularly in the intention that the District's unique landscapes, heritage and biodiversity assets will play a vital role in making great places, and its economic transformation will be achieved based on its key strengths including its rich historic and cultural identity and wealth of environmental assets.
3. Addressing the water environment: • Vision was supported, particularly where it related to responding positively to climate change and sustainable development. However, it was noted that the vision focusses mainly on growth and socio-economic aspects of the Plan. • Suggested that the environmental enhancement aspect be further considered, and reference should be made to the water environment, including water quality and water resources. • This would address the statutory requirement to have regard to River Basin Management Plans in exercising the Councils function affecting a river basin, as well as supporting a healthy water environment, which was vital to the conservation and enhancement of biodiversity. • Revised wording was put forward to address water matters.
Comments
No comments were received in relation to the Spatial Vision

Representation IDs: 27983, 29044, 29064

2.3 STRATEGIC OBJECTIVES

Overview

The strategic objectives indicate how the spatial vision for Bradford District will be delivered by the Council and its partners in making planning and investment decisions. Many of these objectives are identified as corporate priorities while others reflect priorities embedded with regional and national plans and programmes. The objectives carry forward changes indicated as part of the Core Strategy Partial Review (CSPR) and a slight refresh in other areas to reflect the main directions in the Local Plan.

The objectives are specific, achievable, attainable and realistic in what they seek to achieve in order to fulfil the vision over the plan period. The Performance Framework of the Core Strategy and the Annual Monitoring Report will measure whether the Council and its partners are meeting the spatial objectives.

A total, **8** representations from **6** respondents were submitted in relation to the Strategic Objectives. These were received from landowners, developers, agents and three Government bodies (Environment Agency, Historic England and Natural England.

Table 2.3.1: Strategic Objectives - Summary of Representations Received

Comments on the Strategic Objectives				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
8	**6**	**2**	**2**	**4**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Delivering the District's housing requirement (Objective 2) • Role of tourism in the economy • Support for Strategic Objectives 1,2,13, 11, 12, 15 • Consideration of water environment • Consideration of natural environment • Comments on Strategic Objectives 2 ad 16	The Council has reviewed the multiple representations made on the Strategic Objectives and they have been considered in the justification and drafting to the revised Strategic Objectives in Section 2 of the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Delivering the District's housing requirement (Objective 2): • Noted that the second objective seeks to "*ensure that the district's requirements for housing, business and commerce are met in full*". • Council's decision not to deliver the 35% uplift to the minimum housing requirement applied by the Government to the 20 largest urban areas, means that the Plan will not meet this requirement in full.
2. Role of tourism in the economy: • Highlighted that tourism makes an important contribution to the district's economy, and that it was one of the foundations for growth identified in the Council's Economic Strategy. • The economy strategic objective should include specific reference to the intention to realise the full potential that tourism can make to the district's economy. • Suggested that an additional strategic objective be included as follows: "*To maximise the contribution which cultural, arts and tourist assets, including the district's rich built and archaeological heritage, can make to the economy of the area*".
Support:
1. Strategic Objectives 1 and 2: • Objectives that recognise the role of the City of Bradford and the towns in Airedale and Wharfedale as dynamic locations of choice for housing and economic growth, and which ensures that the requirements for housing are met in full were supported.
2. Strategic Objective 15: • Further objectives that support opportunities for leisure and recreation are considered to be important. • Would be consistent with aspirations to enhance and improve facilities available at the East Morton Golf Course for members and the local community.
3. Strategic Objective 13: • **T**he inclusion of strategic objective 13 relating to achieving the vision by safeguarding, enhancing and promoting the District's diverse historic and natural heritage, which helps to reinforce local distinctiveness was welcomed.
4. Strategic Objectives 11 and 12:

- References under strategic objective 11 to improving cultural facilities and in strategic objective 12 to supporting social, economic and physical regeneration of neighbourhoods were also welcomed.

Comments

1. **Delivering the District's housing requirement (Objective 2):**
   - Noted that the second objective seeks to "*ensure that the district's requirements for housing, business and commerce are met in full*".
   - Council's decision not to deliver the 35% uplift to the minimum housing requirement applied by the Government to the 20 largest urban areas, means that the Plan will not meet this requirement in full.
2. **Consideration of the water environment:**
   - Objectives include insufficient reference to the water environment.
   - Improving the status of the district's watercourses and preventing their further deterioration should be included within the Plan's primary objectives, and any opportunity to do so should also be considered. It should also identify measures, opportunities and/or projects to deliver such objectives.
   - Several changes to a number of the strategic objectives (Strategic Objectives 1, 4, 12, 14 and 16) were put forward to in order to address this matter.
   - Was further recommended that it may be appropriate to include an additional objective around the water environment being protected and enhanced.
   - Highlighted that not all waterbodies in the district are navigable - only referring to waterways would exclude certain waterbodies from the scope of the objectives. References should be to the whole water environment or watercourse/rivers.
3. **Consideration of the natural environment:**
   - Strategic objectives which include a range of goals relating to the protection, enhancement and improvement of the District's natural assets were welcomed.
   - Advised that the approach could be made more robust by inclusion of reference to "restoration" where appropriate. Would like to see these objectives being measured by specific targets.
4. **Strategic Objective 16:**
   - Suggested that strategic objective 16 could be strengthened as follows: "*Ensure that new development provides a biodiversity net-gain, and safeguards, restores, and enhances the district's biodiversity assets through careful landscape, woodland and waterways management. In particular the South Pennine Moors and upland fringe*".

Representation IDs: 27984, 28498, 29046, 29047, 29067, 29068, 29701, 29892

2.4 POLICY SP1: DELIVERING SUSTAINABLE DEVELOPMENT

Overview

Policy SP1 sets out the Council's approach to the presumption in favour of sustainable development, established in national planning policy, which must be followed in making planning decisions. The second part of the policy sets out some of the key ways in which the Plan's policies and strategy will support the achievement of the three pillars of sustainable development.

In total, **200** representations from **197** respondents were submitted in relation to the contents of Policy SP1. These were received from local residents, Town/Parish Councils, local and sub-regional environmental groups/bodies, landowners, developers, agents, elected members, Chamber of Commerce, a neighbouring local authority, and Government agencies (Environment Agency, Highways England, Natural England, Historic England).

Table 0.1: Question 2: Policy SP1: Delivering Sustainable Development - Summary of Representations Received

Consultation Question 2 – Policy SP1: Delivering Sustainable Development				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
200	**197**	**173**	**23**	**4**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Selection of proposed housing sites • Policy approach - minimising the use of Green Belt land • Need for clarification over policy approach • Prioritisation of active travel • Development of Green Belt/greenfield land • Flood risk/drainage • Alignment of housing and infrastructure delivery • Regeneration of brownfield land and viability	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting to revised Policy ST1: Delivering Sustainable Development in the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Leeds Bradford Airport • Maximising the use of brownfield land • Consultation process • Level of housing growth • Location of development in Ilkley • Loss of habitats • Alignment between the policy ambitions and the wider Local Plan • Delivery of previously developed land • Addressing the climate emergency • Delivering sustainable development • Reducing traffic levels • Alignment between “net gain” and sustainability objectives • Clarification over the policy approach • Alignment with the National Planning Policy Framework • Achieving zero carbon • Addressing spatial and health inequalities • Considering environmental impact of development • Revised criteria to determine the suitability of sites • Meeting environmental objectives • Proposed amendment – minimising environmental impacts • General support • Protection of open space/green space • Alignment of plan proposals with sustainable development • Attention given to sustainable development • Transformational investment in infrastructure and achieving net zero carbon • Role of neighbourhood plans	

• Alignment with accepted definitions of sustainable development • Sustainability appraisal methodology • Strategic Flood Risk Assessment • Level of housing growth • Local of development and achieving net zero carbon • Inclusion of green space in development • Addressing flood risk and drainage in Keighley • Flood risk and drainage • Inclusive growth and green growth • Repetition of national planning policy • Level of employment land provision • Provision of housing • Re-use of brownfield land • Broad support	

Summary of Representations
Objections:
1. Selection of proposed housing sites: • Some of the sites chosen for building homes would not protect environmental assets that already exist but would destroy them. • Would also reduce the network of green space available to residents and wildlife. No mention of consultation with communities rather building without delay. • Urban green spaces considered vital for humans and animals and cannot be replaced by providing them elsewhere in place of where they already existed. Need to stop messing around with nature
2. Policy approach - minimising the use of Green Belt land: • Object to inclusion of policy criteria that seeks to minimise the use of Green Belt land. Was not a justified and sustainable approach.
3. Need for clarification over policy approach: • No clarity over what policy has been adopted or is being recommended.

- Inherent contradiction in using the word "growth and economic potential" as a phrase within in the plan. This cannot be fixed with the word "sustainable".

4. Prioritisation of active travel:

- Would not support the dilution of environmental aspects of the plan, whilst active travel should be prioritised over electric cars. A clear target for reduction in non-active journey needs to be set.
- Planning should follow that, not include it as an afterthought.

5. Development of Green Belt/greenfield land:

- Plan contains too little consideration of brownfield sites which would assist regeneration, and a readiness to justify the use of Green Belt.
- Too much proposed use of greenfield site and not enough regeneration for redundant office space.
- More imaginative use of brownfield needed.
- Plan does not do what it should – Green Belt should be protected. Merging settlements and unrestricted was considered to harm the environmental for all.

6. Flood risk/drainage:

- Concern over consideration being given to the use of land liable to flooding, e.g. site IIL3/H: Coutances Way, Ilkley.

7. Alignment of housing and infrastructure delivery:

- Considered to be a disconnect between housing and infrastructure delivery.
- Highlighted that possible changes to the transport infrastructure were in the planning stage, with defined outcome. L
- Lack of a well-established and coherent transport strategy would conclude that the Local Plan does not conform to the NPPF sustainability policy (NPPF Chapter 2 - paragraphs 2 to 14)

8. Regeneration of brownfield land and viability:

- Was noted that the plan seeks focus development in main urban areas as well as support renewal/regeneration of urban areas and brownfield sites. Thie was agreed to be an important issue, but it questioned whether progress was realistically being or likely to be, made and how.
- Making unviable brownfield land viable through regeneration was highlighted as being a longstanding matter. Viability was raised as an issue over a number of years and development plans and appears again in the emerging Local Plan.
- Highlighted that there were 5,000 unoccupied properties in the District, plus a significant contribution of homes that could be delivered from "unviable" brownfield sites. However, this contributed was specified with the emerging Local Plan. Council needed to be transparent on this matter, as despite the number not being known, it would be a significant number of homes.

- Queried why the same issue had persisted for 16 years, why the same policy approach was being continued. and what it had actually delivered and when was any real progress towards achieving going to be shown.
- Considered to be a long-term failure in addressing such an ongoing important issue affecting the delivery of homes where they were needed the most - close to jobs and in areas requiring affordable homes.
- Suggested that the Council should engage with other local authorities e.g. Leeds or Manchester, that faced similar issues regarding brownfield land and viability and overcome them.

9. Leeds Bradford Airport:

- Considered that Part B-4 of the policy aligns with the Council's declaration of a climate emergency and was viewed as a good policy statement, however it was considered that action needed to match the aspiration.
- Noted that the Council supported expansion plans at Leeds Bradford Airport but did consider the effects on Wharfedale residents. Should have understood the health, welfare and air quality issues of the decision.
- Suggested that if the Council did care about the climate emergency and taking action to tackle air quality problems, it would not have collaborated on the airport's expansion or at the very least should be seeking a special condition on the planning application to ensure a 50/50 split in the number of flights between Wharfe Valley and Leeds areas.
- Not addressing these issues would result in worsening of health outcomes for people in the Wharfe Valley.

10. Maximising the use of brownfield land:

- The statements set out in Parts B-5b and 5d of the policy were supported, however it was not considered the allocation of brownfield and non-Green Belt land was being prioritised first.
- Highlighted that in the first five years of the plan period would see the release of 666 homes on brownfield sites, 648 of greenfield sites and 621 on Green Belt sites.

11. Consultation process:

- Concerns over the length, timing and the online-only nature (excluding many residents) for the consultations, and the difficulties in meeting with and informing residents of the Plan's proposal due to COVID-19 restrictions

12. Level of housing growth:

- The claim that the district needed 1,700 new dwellings every year would be open to robust challenge due to evidence of falling, not rising, population estimates.
- In opposition it was suggested the Council was not planning positively for enough housing as required in the adopted Core Strategy and by the Government's Local Housing Need requirement.
- Should be planning for a minimum of at least 2,300 homes per annum.

13. Location of development in Ilkley:

- Despite the focus in the Plan on climate change, environmental sustainability, green infrastructure and the importance of the Green Belt, 97% of the new homes for Ilkley were to be built on Green Belt. Would be of such seriousness and have far-reaching consequences, it cannot be allowed to go unchallenged - once the land was removed from the Green Belt it would too late.

14. Loss of habitats:

- Policy as drafted would not stop habitat destruction and does nothing to ensure residents views were considered and honoured. The approach was considered to be the opposite.
- Would be easier to believe that sustainable development would not imply environmental destruction if there was clear focus on redeveloping former industrial/commercial sites.
- Impact assessments were not carried or have been ineffective.

15. Alignment between the policy ambitions and the wider Local Plan:

- Policy considered to contain good ambitions, however not all the Plan's contents accorded with them.

16. Delivery of previously developed land:

- Policy approach in relation to using previously developed land (PDL)/brownfield land should be much stronger. Use of the term "where possible" was considered a "get out".
- Proposals for Thornton show development of major PDL sites - Dole and Prospect Mills - as taking place in years 6 to 10, a similar timescale to greenfield and Green Belt sites. Site was previously shown (in the UDP) as being developed by 2013.
- Current approach would mean that the site would still be undeveloped in 2038. Should be a greater sense of urgency.

17. Addressing the climate emergency:

- Climate change emergency should be paramount, with all other objects being secondary.
- More green space, maintaining biodiversity, clean air, better public health etc would follow on naturally if that were the case.

18. Delivering sustainable development:

- Considered that sustainable development was required, including securing the mitigation of, and adaptation to, climate change.
- All planning strategies and decisions taken in support of them, should reflect the Council's ambitions to help businesses and communities build a zero carbon future and prepare for the impacts of climate change. Planning policies and decisions must be in line with achieving net zero carbon by 2038.

19. Reducing traffic levels:

- Reduction in traffic levels, especially private cars, needed to happen quickly.

20. Alignment between “net gain” and sustainability objectives:

- Need for "net gain" set out the top level of the Plan was considered vague, and needed to be tightened up properly with social, economic and environmental objectives

21. Clarification over the policy approach:

- Suggested that Plan's strategic outcomes should be net reductions in greenhouse gas emission, car traffic, pollution and flood risk as well as net enhancements of biodiversity and a net increase in access to open space. The outcomes should be socially and spatially equitable.
- Noted that Part A of the policy was based on the presumption in favour set out in the NPPF, whilst Part B was Bradford's expression of it.
- Suggested that the local expression should be much clearer and more specific about the need to achieve high-level, net enhancements to social, economic and economic well-being.

22. Alignment with the National Planning Policy Framework:

- Policy approach was generally supported, however Part B was not considered to align directly with NPPF (Paragraph 8).

23. Achieving zero carbon:

- Policy did not put achieving net zero carbon by 2030/2038 at heart of the Local Plan.
- Suggested that additional wording was added to the policy to address this,

  This was follows: "*Climate change is the greatest long-term challenge facing our city and communities. Addressing climate change is therefore Bradford Council's principal concern for sustainable development. For the avoidance of doubt, achieving sustainable development includes securing the mitigation of, and adaptation to, climate change. All planning strategies, and the decisions taken in support of them, must reflect the Council's ambition to help business and communities build a zero carbon future and prepare for the impacts of climate change. Accordingly, planning policies and all planning decisions must be in line with achieving net zero carbon by 2030*". (or 2038)"

24. Addressing spatial and health inequalities:

- Considered that creation of healthy places should be hand in hand with the mitigation of climate change in a shared policy agenda.
- Highlighted that those who are disadvantaged have progressively worse health outcomes and that improving health and wellbeing results in improved conditions in which people live, work, learn and age thus empower them and promoting participations, social cohesion and equity.
- Spatial variation was also noted as creating a divergence in health outcomes affected by transport/active travel, air pollution, road safety, neighbourhood facilities, housing, urban planning, crime/fear of crime. and the urban environment and climate.
- Suggested that additional wording be added to Part B-4 of the policy to refer to "..*promoting high quality <u>low carbon</u> design*.."

  Further suggestions were for additional wording to be added to Part B-4 to refer to "..*<u>working to ensure both health gain and a reduction in equalities</u> by ensuring that sufficient land is allocated to meet the housing needs*....", and "...*developing healthy places*

with access to local healthcare and good quality walking and cycling routes..." as well as providing opportunities for "...*sport, recreation and food growing*..."

25. Considering environmental impact of development:

- Considered that the Local Plan must take more fully into consideration the impact on the environment of any new proposed developments,
- These include carbon emissions, air pollution, biodiversity, and other environmental pollution (water, light, noise, odour, soil).
- Suggested that Part B-5 of the policy be replaced by the following: "*In order to achieve sustainable development, encourage sustainable modes of travel and protect and conserve areas of recognised environmental and amenity importance, the following sequential approach in policy should guide the selection of sites and locations for development:*
  1) *the re-use of previously developed land and buildings (brownfield sites) within urban areas, provided it is not of high environmental value;*
  2) *other previously developed land well connected to public transport links;*
  3) *locations within urban areas, subject to the need to protect and conserve areas of recognised environmental and amenity interests; other sites and locations which are well located for achieving sustainable development and reduce the need to travel*".

26. Revised criteria to determine the suitability of sites:

- Suggested that to ensure sustainable development objectives were met and the most sustainable locations within, adjoining and outside urban areas were selected as preferred locations for development, the additional/revised policy wording should be included within the Plan to establish the suitability of individual sites.
- The suggesting wording was as follows:
  - *Accessibility of a site by non-car modes of transport, and potential to improve accessibility ("significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes" NPPF, para 103).*
  - *Scope to achieve carbon neutral or carbon negative development.*
  - *Capacity of existing infrastructure, including public transport, utilities and social infrastructure (such as schools and hospitals) to absorb further development.*
  - *Physical constraints on the development of land, including for example, the level of contamination, stability and flood risk ("plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property" NPPF, para 157).*
  - *The impact developing a site will have on the area's environmental carrying capacity and in particular, implications for resource conservation, natural resources and biodiversity ("…minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures" NPPF, para 170b).*

- *The impact developing a site will have on the area's cultural resources. ("…These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations" NPPF, para 184).*
- *The impact developing a site would have on pollution levels. ("…Planning policies should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality" NPPF, para 170e).*
- *The suitability of sites for mixed-use development and the social, economic and environmental benefits this might bring local communities*.

27. Meeting environmental objectives:

- Considered the wording of Part B-3 of the policy should be strengthened.
- Was suggested reference to restoring the District's natural environmental resources as well as protecting, conserving and enhancing them should be included.
- Several other grammatical and typographic amended were also put forward.

28. Proposed amendment – minimising environmental impacts:

- The commitment set out in Part B-5 of the policy to ensure that a sequential approach to site selection and allocation was welcomed.
- Suggested that the item e) could be strengthened by expanding the areas for consideration within the context of adverse environmental impacts and referring to the mitigation hierarchy.

Support:

1. General support:

- There was broad support for the policy and its approach towards sustainable development principles.
- Considered to provide a clear and positive statement of the goals relating to sustainable development.
- Viewed as being holistic, integrated and ambitious as well as sensible.
- Parts 4 and 5e were particularly supported.

2. Protection of open space/green space:

- Planning for open space and its protection to allow residents to use was considered key to their welfare.
- Noted that during the pandemic there had been a decrease in people travelling any distance for recreation purposes, with many opting to use green space close to their homes.

- Local green space requires protection.

3. Alignment of plan proposals with sustainable development:

- The general concept of delivering sustainable development was supported, however it was queried whether the Plan's proposal met that objective. Reference was made to sites IL1/H and IL3/H.

4. Attention given to sustainable development:

- Policy was supported in principle, however concerns were expressed whether regard had been paid to sustainable development.
- Focus would appear to be primarily on economic benefits.
- Queried why development, with its associated environmental impacts, was being permitted on greenfield when there were brownfield sites that could be redeveloped first.
- Queried why developments had been permitted without consideration of the type of facilities residents would need and without having adequate infrastructure and public transport connections.
- Seeking developer contributions to address such was viewed as not being good enough.
- Suggested that the Council should adopt a stronger approach to the redevelopment of existing facilities/amenities that would impact on communities, whilst the social policy should reflect the need to provide, maintain and enhance such facilities local to development.

5. Transformational investment in infrastructure and achieving net zero carbon:

- Policy was broadly supported. Sustainability should be at the heart of Council decisions.
- Policy should, in relation to transformational investment in infrastructure, include a requirement for every infrastructure project to be able to evidence how, when construction and use were combined, they will have net zero carbon emissions by 2038.
- Suggested that any measurement of carbon emissions must not include carbon off-setting - this is misleading and prone to misuse.

6. Role of neighbourhood plans:

- Reference to neighbourhood plans within the policy was noted, however it needed to be clarified in relation to their role.
- Recommended that it needs to be clarified in the policy that neighbourhood plans become part of the adopted Local Plan.

7. Alignment with accepted definitions of sustainable development:

- Inclusion of the policy was supported; however it was not considered to align with widely-accepted definitions of sustainable development, thus offering a poor foundation for incorporating sustainability into local planning.
- Sustainable development was considered to mean development that meets the needs of current generations without disadvantaging future generations.

- Planning needed to take account disadvantage, whilst social sustainability related to inter/intra-generational equity not meeting current needs.
- Research highlighted that clear, local engagement, dialogue and social capital was critical to enabling sustainable forms of development.
- Has not been recognised within the draft policy. Recommended that further upskilling on sustainable development and an evidence-based approach taken.

8. Sustainability appraisal methodology:

- Policy considered to be sound, however the Council's Sustainability Appraisal methodologies were not.
- Should be evidenced based and was currently too judgemental.

9. Strategic Flood Risk Assessment:

- Additional reference should be included highlighting that the sequential flood risk assessment must include groundwater flood risk, not just fluvial and coastal flood risk.

10. Level of housing growth:

- Policy was supported; however, the Council was not abiding by its principles by not positively planning for the number of homes required (as set out in the Core Strategy and the Local Housing Need requirement).
- To be found sound, the Plan must plan positively for a minimum of 2,300 homes per annum, which would equate to 46,000 new homes over a 20-year plan period.
- No credible evidence available to suggest that level of development could not be adequately planned for and met in a sustainable manner.

11. Local of development and achieving net zero carbon:

- Clarification of a number of strategic policies was welcomed, whilst policies for the sustainable growth and development, that prioritise the use of brownfield land and work towards regeneration were supported.
- Emphasis on strategies being designed to achieve net zero carbon emissions by promoting greener lifestyles/practices, and recognising the value of green infrastructure and open spaces was noted.

Comments	

1. Inclusion of green space in development:

- inclusion of open space areas in developments in Keighley was considered to be poor. Area was noted as having no parks and little signage to support the use of the countryside.

- Contrasts to other parts of the country where development was accompanied by parks/recreation areas, ribbon strip to facilitate access and vehicle free cycle/footpath sections.

2. Addressing flood risk and drainage in Keighley:

- Concerned that developments in the Keighley West area would disturb the natural resilience of the land to soak up water and have to date provided poor drainage systems.
- Water would eventually reach the Rivers Aire and Worth, worsening flood risk downstream.
- Development should only be allowed that hold water more successfully on the land and do not facilitate rapid drainage to rivers.

3. Flood risk and drainage:

- Noted that the policy and supporting text makes reference to applying a flood risk sequential approach to direct development to areas at lowest flood risk, and the use of data and intelligence to managing the early detection of flood risk. This approach was supported.

4. Inclusive growth and green growth:

- Policy does not include reference to "inclusive growth" or "green growth" despite being highlighted in other policies.
- Both elements should be front and centre of the Plan, reflecting the aspirations of the Bradford Economic Strategy (BES).
- Policy should be amended to refer to inclusive and green growth.

5. Repetition of national planning policy:

- Policy sets out the approach to sustainable development as set out in national planning policy.

Questioned why it was necessary to duplicate national policy within the Local Plan.

6. **Level of employment land provision**:

- Part B2 included reference to supporting the economic strength of the district by allocating sufficient land for new employment uses. This aim was supported.
- Concern was expressed that the amount of employment land had reduced substantially from that required in the review of the RUDP and again from the Core Strategy Partial Review. This was not supported.
- Noted that the level of employment land proposed was calculated on the premise of providing 26,000 jobs, a principle that broadly aligned with the Bradford Economic Strategy and was supported.
- The translation from the number of jobs to floorspace requirements did not make allowance for previously failures to provide enough employment land in previous version of the plan. Has had a knock-on effect on take up rates and resulting in business moving out of the district.

- Highlighted that a review of other Local Plans in West Yorkshire showed that they have not only provided for more ambitious economic growth, but that Bradford's ratio of jobs to homes was not balanced. Would result in the city becoming a commuter town and its economic base being further weakened.
- Policy should be amended to ensure the balance of jobs to homes will support the city's future economic growth.

7. Provision of housing:

- Part B4 was noted as referencing support for allocating sufficient housing needs to meet a growing population. The need to ensure a sufficient supply of good quality homes was supported. It was seen as an important consideration for employment looking to relocate to the District.
- Considered critical that the number, size and location of homes reflected the varied nature of the population and was not overly dominated by one-bedroomed city centre apartments.

8. Re-use of brownfield land:

- Part B5 was noted as including a focus on re-using brownfield land. This approach was supported.
- Considered critical that the focus on brownfield land, particularly for housing, was not at the expense of providing/retaining good quality employment land.
- The strongest market for this type of development was where there were good transport connections, for example the M606, A650 and A58.

9. Broad support:

- Clarification of a number of strategic policies was welcomed, whilst policies for the sustainable growth and development, that prioritise the use of brownfield land and work towards regeneration were supported.
- Emphasis on strategies being designed to achieve net zero carbon emissions by promoting greener lifestyles/practices and recognising the value of green infrastructure and open spaces was noted.

Representation IDs:

287, 717, 1013, 1064, 1200, 1283, 1335, 1498, 1873, 1903, 1950, 2444, 2618, 2730, 2824, 3271, 3343, 3669, 3774, 3877, 4651, 5027, 5106, 5129, 5260, 5369, 5492, 5595, 5690, 5904, 6754, 9794, 10937, 11368, 12162, 13883, 16259, 16318, 16714, 16871, 17408, 17494, 17674, 19758, 19804, 19832, 21786, 21878, 21907, 21936, 21965, 21994, 22023, 22055, 22084, 22113, 22142, 22182, 22211, 22240, 22269, 22298, 22327, 22356, 22467, 22496, 22525, 22554, 22592, 22621, 22650, 22679, 22708, 22737, 22781, 22810, 22848, 22877, 22906, 22935, 22964, 22993, 23022, 23051, 23107, 23136, 23165, 23194, 23223, 23252, 23281, 23310, 23339, 23368, 23397, 23426, 23601, 24113, 24157, 24196, 24309, 24338, 24367, 24396, 24427, 24456, 24541, 24570, 24619, 24694, 24732, 24761, 24839, 24926, 24955, 24984, 25014, 25044, 25078, 25129, 25176, 25183, 25212, 25424, 25473, 25702, 25731, 25760, 25789, 25818, 25847, 25876, 25905, 25934, 25963, 25992, 26021, 26050,

26079, 26108, 26137, 26166, 26195, 26224, 26253, 26283, 26318, 26347, 26560, 26675, 26707, 26750, 26793, 26822, 26851, 26880, 26909, 26940, 26969, 27001, 27030, 27059, 27112, 27141, 27170, 27199, 27228, 27260, 27289, 27318, 27347, 27376, 27405, 27434, 27556, 27681, 27715, 27788, 27819, 27883, 27957, 28182, 28272, 28360, 28500, 28501, 28664, 29048, 29131, 29132, 29152, 29205, 29558, 29598, 29631, 29702, 29806, 29997, 30078, 30161

2.5 POLICY SP2: SPATIAL PRIORITIES

Overview

Spatial priorities were first set out in the adopted Core Strategy DPD (2017). These have been carried forward into the emerging Local Plan have been updated, where appropriate, to include a stronger focus on local communities, the economy, active travel and high-quality infrastructure. However, they maintain a strong emphasis on transformation and change within the district.

In total, **199** representations from **196** respondents were submitted in relation to Policy SP2. These were received from local residents, developers, landowners, agents, Town/Parish Councils, local/sub-regional environmental groups, Government agencies (Environment Agency, Highways England, Historic England, Natural England), Chamber of Commerce, elected members and a sub-regional body (West Yorkshire Combined Authority).

Table 2.5.1: Question 3 - Policy SP2: Spatial Priorities - Summary of Representations Received

Consultation Question 3 – Policy SP2: Spatial Priorities				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
199	**196**	**161**	**31**	**7**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Addressing environmental threats and impacts • Amendments • Impact on the highway network/traffic • Quality of future development in Ilkley • Leeds Bradford Airport • Use of brownfield and increased density for housing • Green and Blue infrastructure corridors • Managing impacts and protecting Bingley • Green Belt development in South East Bradford	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of a revised Spatial Strategy Policy SS1 in Section 3 of the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Development and infrastructure provision • Location of housing development and environmental impacts • Provision of employment in Local Growth Centres • Reliance on previously developed land and housing delivery • Role and status of Queensbury • Biodiversity • Delivering development is a suitable location. • General support • Supporting and maintaining local character • Support, except in relation to the Leeds Bradford Airport • Implementing/delivering spatial priorities 10 to 12 • Role and status of neighbourhood plan policies • Need for greater integration between planning and other aspects of development • References to sustainable growth • Addressing health impact and inequalities • Compliance with the policy • Provision of employment land in Wharfedale • Spatial priorities 8 to 12 • Provision of a robust transport evidence base • Delivery of housing • Role of Local Service Centres (Baildon) • Role of Local Service Centres (Wilsden) • Role of Principal Towns (Ilkley): • Role of Local Growth Centres (Steeton with Eastburn): • Role of Local Growth Centres (Burley in Wharfedale) • Spatial Priority 1	

• Settlement hierarchy, including the role of Burley in Wharfedale • Role of Local Service Centres (East Morton): • Holme Wood regeneration area • Support regeneration within District and the role of Principal Towns • Role of the historic environment • Spatial priorities 7 and 9 • Regeneration of Bradford and the Holme Wood regeneration area • Role and status of Queensbury • Access to the South Pennine Moors • Loss of cultural and industrial heritage • Flood risk and water management. • Supporting the Leeds City Region Spatial Priority Areas (SPAs • Meeting housing need and role/status of Cottingley • Delivering transformation of the district • Role within the Leeds City Region • Reliance on previously developed land and housing delivery	

Summary of Representations
Objections:
1. Addressing environmental threats and impacts • Considered that expansion of the Leeds Bradford Airport, the proposed incinerator and widening of road networks would not do anything to counter environmental threats faced by the district. • Regeneration had amounted to building eyesores and densifying populations rather than improving the physical environment and air quality.

• More could be done to improve, existing areas, housing and communities that have little green space and are strewn with litter and enveloped in pollution.
2. Amendments: • Much of the policy content was supported, however several sections were not. • Such objections could be overcome by amendments (minor and more substantial changes) to the policy as well as other connected strategic, topic based and settlement/site specific policies.
3. Impact on the highway network/traffic: • Proposed measures in the Plan would put increased pressure on an already challenged highway network and traffic.
4. Quality of future development in Ilkley: • The proposed size/scale of developments in Ilkley (sites IL1/H and IL3/H) would preclude the delivery of high-quality development, in keeping with existing housing/properties in the area.
5. Leeds Bradford Airport: • Policy contains a contradiction between spatial priorities 4 and 8. • Not possible to reconcile air travel, airport expansion and dependence on the airport as an economic driver, with the move towards a green economy and a resilient lower energy and low carbon future as well as the need minimise environmental threats. • Would also not be compatible with the zero-carbon ambition as a low carbon aviation could not be achieved within the plan period. To reach this goal, it would highly probable that a contraction in air travel would be needed. • Policy approach locks in a degree of economic dependence on a very high carbon activity and would influence land use by providing justification for greenfield, road-based development between Bradford and the airport, including use of Green Belt with low employment densities. • Plan should include an alternative strategy where the airport is not a spatial priority and give greater consideration to the extent to which it would enable other plan objectives to be better implemented.
6. Use of brownfield and increased density for housing: • Should re-double efforts to locate possible housing on brownfield sites. • Would be made more straightforward if there were to be a concerted effort to increase density of housing. Could be possible with the climate emergency in terms of home construction, 15-minute neighbourhoods and the need to dispense with the private car outside dwellings.
7. Increasing the level of brownfield development:

- Increased proportion of growth being directed to the Regional City of Bradford was noted; however, the proportion of new development remained at 50%.
- Considered that due the increased emphasis on making effective use of land in the NPPF, it would be reasonable expected for the percentage to increase. Plan was not clear as to why this was not the case.
- Was important to consider the development expectations in spatial priorities 7 to 12 would be more effectively achieved with a greater focus on brownfield sites. This was not adequately evidenced.
- Contended that an alternative strategy of a significantly higher concentration of development onto brownfield sites had not been fully tested.

8. Green and Blue infrastructure corridors:

- No development should take place in green and blue infrastructure corridors such as the River Worth, River Aire and North Beck).
- Green corridors should be conserved/preserved and enhanced in line with all European, national, regional and local policies.

9. Managing impacts and protecting Bingley:

- Policy was considered to almost say the right things but did not properly specify how it would protect Bingley.
- Noted that the Clean Air Zone (CAZ) did not extend to Bingley, whilst the construction of the proposed incinerator at Marley would have a negative impact on health in the Aire Valley as would the increased traffic serving the site.

10. Green Belt development in South East Bradford:

- Objection to Green Belt development in South East Bradford in particular the Tong area. Green Belt was set to stop urban expansion.
- Majority of people disagree with plans for housing and a new road in the area.
- Development would affect a Grade II Listed Building.
- No care given to local residents nor the environment in the area and the wildlife that needs it.

11. Development and infrastructure provision:

- Priorities within the policy were considered to be individually laudable, however the approach of development first and infrastructure provision later should be scrapped.
- Plan did not provide details of where meaningful employment growth in Wharfedale would come from, taking into account transport, education and health services in the area were struggling.

12. Location of housing development and environmental impacts:

- Considered that avoidance of flood risk had not been obtained by developing on flood plains (as was the case on the Sun Lane site in Burley in Wharfedale), and nor addressing environmental concerns demonstrated on Green Belt green fields.

- Highlighted that there were 5,000 unoccupied properties in Bradford, and alternative lower grade land available within the district.

13. Provision of employment in Local Growth Centres:

- The role of the growth centre designation and key spatial priorities were questioned, as there were no significant levels of jobs growth in those areas to support the additional housing proposed.
- Highlighted that climate change, the pandemic, the need to reduce commuting and a likely increase in internet use would add further loads onto existing poor infrastructure, e.g. no employment had been identified in Silsden and only one in Steeton.
- Noted that Airedale Hospital was the main employer in the Silsden/Steeton area, but their site was constrained from major expansion due to recent housing development.

14. Reliance on previously developed land and housing delivery:

- Concerns raised over relying on complex city centre brownfield sites to deliver housing. Reliance on potentially constrained, contaminated or unviable previously development land sites will result in failure to identify sufficient deliverable and developable land.
- Bradford was highlighted as lower value area, when compared nationally, meaning that it would be unlikely to be attractive for large scale city/district centre investment in historic buildings, such as mills.
- The role of high-density development in town/city locations in meeting the requirements of the wider District housing market was questioned – 80% of schemes within the city centre had mainly for flats.
- Suggested that land which was poorly performing (against the five Green Belt purposes) and scored well against regeneration credentials be considered as suitable to deliver the necessary housing mix across the district.

15. Role and status of Queensbury:

- Identification of Queensbury as a Local Growth Centre within the policy (and Policy SP3) was supported. It was of scale and had the range of services expected to achieve that status in the settlement hierarchy.
- Policy should make reference to “Growth Areas” (as set out in the Core Strategy) where additional/extra planning growth for housing could take place.
- A “Growth Area” designation would a distinct and separate objective to the Local Growth Centre status in some settlements and would help to achieve higher housing targets. The Sustainability Appraisal was silent on such a reasonable alternative option, despite it being within the Core Strategy which made it one.
- Queensbury should be retained as a “Growth Area” as it was considered capable of accommodating more homes than planned for. It could achieve 1,000 homes. Option had not been tested in the SA as a reasonable alternative when it should have regarded as such, given the level of dwellings identified in the Core Strategy.
- Considered to be a serious issue for the Local Plan’s soundness, which should be rectified in the Regulation 19 version of the Plan.

16. Biodiversity:

- Acknowledgement throughout the Draft Local Plan of the internationally important status of the South Pennine Moors as a Special Protection Area (SPA), and its inclusion within Spatial Priority 7 of the policy was welcomed.
- The Spatial Priority's wording could be made more robust by including a reference to restoring as well as protecting and enhancing the district's environmental resources.
- Inclusion of spatial priorities 8 and 9 was also welcomed

Support:

1. Delivering development is a suitable location:

- Agree that there needed to be development to support the district's future prosperity.
- However, it should be done in an appropriate way on suitable ground that would not be susceptible to flooding or subsidence.
- If followed appropriate, it would delivery suitable industrial and social building opportunities for businesses and residential without concerns of having to undertaken excessive remedial work in the future.

2. General support:

- The policy and it is approach was generally supported.

3. Supporting and maintaining local character:

- Policy was supported in principle.
- Outlying areas currently treated as suburbs and extensions of Bradford.
- Needed to be a greater emphasis on treating Principal Towns and Local Growth Centres as unique with policies tailored to them and that play to their strengths.
- Pandemic highlight the desire for more local services and community facilities to avoid the need to travel into Bradford City Centre.
- Green spaces between settlements should also be respected to help retain each area's unique identity and maintain separation.
- Approach would benefit the proposed environmental and social policies in the Plan.

4. Support, except in relation to the Leeds Bradford Airport:

- Policy was broadly supported; however, concerns were expressed regarding spatial priority 4 that seeks to optimise of the airport.
- Air travel highlighted as one of main contributors to carbon emissions.
- Council must not support airport expansion or encourage an increase in flights.
- Businesses should be encouraged, via the provision of first-class digital resources, to carry out their work without the need to fly.

5. Implementing/delivering spatial priorities 10 to 12:

• Policy was broadly supported; however, to deliver priorities 10 to 12 would require more oversight of new development, a more hardline approach to planning applications and a more holistic, long-sighted vision for settlements. • Two developments in Silsden were highlighted as having changed the settlements local character, whilst the provision of new school on the town's edge will lead to increased car use, rather than a shift to sustainable and active forms of movement.
6. Role and status of neighbourhood plan policies: • Commitment to involvement of communities in Local Planning was noted. • Policy should be strengthened to highlight that where a neighbourhood plan develops policies on design, those policies be considered as the primary expression of local character, community and distinctiveness.
7. Need for greater integration between planning and other aspects of development: • Spatial priorities were largely supported, however there should be greater integration across them and different aspects of local planning and development. • Joining up planning, transport and other areas of development would allow opportunities to influencing sustainable behaviours such as use of public transport/active to be seized and address the cycle of car-dependent communities.
8. References to sustainable growth: • Disagree with references to sustainable growth in the plan. • Research showed that an obsession with growth has led to environmental crises and widening inequalities. It recommended becoming agnostic about growth.
9. Addressing health impact and inequalities: • Significant that spatial priority 1 did not refer to health – it had been relegated spatial priority 12 which includes references to healthy places (but not healthy people). • Given the poor health in the district, assessments of the health impacts (both physical and mental) of every planning proposal should be front and centre of the policy. • To reduce health inequalities, it was considered that urban residents must not be left with the negative impacts of the loss of surviving open space.
10. Compliance with the policy: • The aims of the policy were supported; however, it was contended that several proposals within the Plan failed to comply it. • Plans to remove 16ha of high landscape open space from the Green Belt surrounding Ilkley would not "support, enhance or protect" as set out in priority five – it would have the opposite effect.
11. Provision of employment land in Wharfedale:

- Policy was supported as it seeks to achieve sustainable development in line with the NPPF and which should be theme that is central the Plan and its spatial priorities.
- Spatial priority 5 in relation the role of Principal Towns and Local Growth Centres (including Burley in Wharfedale) was also welcomed.
- The creation of well-designed, high-quality development and sustainable places where people would want to live and work was supported.
- Accordingly, there was a need to allocate employment land alongside housing to reduce the need to travel and ensure the vitality and viability of settlement, as an important element of creating sustainable development.
- Plan has an absence of employment land allocations in Wharfedale, which should be addressed to ensure sustainable growth is achieved.

12. Spatial priorities 8 to 12:

- Spatial priorities 8 to 12 were supported.
- These try to promote well balanced economic improvements for the area, whilst protecting people's quality of life and the environment as well as air quality.

13. Provision of a robust transport evidence base:

- Policy aspirations were supported.
- In order to be effective and deliver the spatial vision, the plan needed to be supported by a robust evidence base to enable site to emerge sustainably.
- Suggested that further work was required.

14. Delivery of housing:

- Policy approach was broadly supported; however, it did include a specific reference to the delivery of housing in the district to ensure that identified needs over the plan period.
- Due to housing delivery being a key part of the plan and the vision, the policy should be amended via the inclusion of an additional criterion to reflect this.

15. Role of Local Service Centres (Baildon):

- Spatial priority 6 relating to the role of Local Service Centres, such as Baildon, in providing for homes and local services was supported.

16. Role of Local Service Centres (Wilsden):

- Spatial priority 6 relating to the role of Local Service Centres, such as Wilsden, in providing for homes and local services was supported.

• Keen to work with the Council to achieve this and deliver sustainable development benefits via housing delivery in Wilsden.
17. Role of Principal Towns (Ilkley): • Spatial priority 5 relating to the role of Principal Towns, such as Ilkley, as hubs for the economy, housing, community services and infrastructure was supported**.**
18. Role of Local Growth Centres (Steeton with Eastburn): • Spatial priority 5 relating to the role of Local Service Centres, such as Steeton with Eastburn, as hubs for the economy, housing, community services and infrastructure was supported.
19. Role of Local Growth Centres (Burley in Wharfedale) • Spatial priority 5 relating to the role of Local Service Centres, such as Burley in Wharfedale, as hubs for the economy, housing, community services and infrastructure was supported**.**
20. Spatial Priority 1: • Spatial priorities set out within the policy were broadly supported, in particular spatial priority 1 which supports key regeneration areas within the Regional City of Bradford, including Allerton.
21. Settlement hierarchy, including the role of Burley in Wharfedale: • The articulation of a broad settlement to established a sustainable pattern of growth and development across the District was supported. • Burley in Wharfedale's continue designation as a Local Growth Centre was also supported – it was considered consistent with approach set out in the adopted Core Strategy, which was previously examined and deemed sound. • The settlement was viewed as highly sustainable and strategically location with excellent public transport links, as well as an attractive and vibrant place to live, work and invest. • It represents and suitable and sustainable location for housing growth and making a significant contribution to meeting the District's housing needs and supporting community facilities.
22. Role of Local Service Centres (East Morton): • Spatial priorities promoting growth in Local Service Centres were supported. • Suggested that a greater level of housing growth could and should be directed to East Morton**.**
23. Holme Wood regeneration area: • The principal of an urban extension to the east of Holme Wood was highlighted as being well established. Continued reference to the Holme Wood regeneration area within the policy was welcomed.

- This reinforced the importance of delivery of urban extension, given the clear benefits that it would have on the regeneration of Holme Wood.

24. Support regeneration within District and the role of Principal Towns:

- The priorities set out in the policy were supported.
- Emphasis on transforming the economic, environment, physical and social conditions of the district, include the Regional City of Bradford and key regeneration areas including Keighley was particularly supported.
- In addition, the emphasis on supporting, protecting and enhancing the roles of the Principal Towns (Bingley, Ilkley and Keighley) was considered an important priority. They have a district-wide significant role as service, employment and transport hubs.

25. Role of the historic environment:

- Recognition of the important contribution the historic environment makes to the district's economy, and the opportunities to built on its distinctive and varied architectural, heritage and cultural assets were welcomed.
- Recognition that a good quality environment was critical to the social, economic and environmental wellbeing of the district was endorsed.
- Positive environment management was viewed as being vital if the environment was to be safeguard and improved.
- Spatial priorities 7 and 11 were supported**.**

26. Spatial priorities 7 and 9:

- Spatial priorities 7 and 9 were supported.
- References to managing river catchments for biodiversity enhancement as well as for flood mitigation were welcomed.

27. Regeneration of Bradford and the Holme Wood regeneration area:

- Commitment to supporting the regeneration of the district within the policy including highlighting Holme Wood as a key regeneration was noted.
- Combined with Policy SP3 the policy approach would encourage development that support's the regeneration of the city of Bradford.
- These policy elements were fully supported and considered essential that they are maintain as an objective.
- Highlighted that land at Raikes Hall Farm, Holme Wood (SLA Ref: SE/163) can deliver on the objection that no alternative site can.

28. Role and status of Queensbury:

- Identification of Queensbury as a Local Growth Centre was supported, as it is of a scale and has the range of services expected to achieve that status in the settlement hierarchy.

Comments
1. Role and status of Queensbury: • Suggested that Queensbury should be designated as a Local Growth Centre and identified as a "Growth Area" (as it had been in the Core Strategy). Not testing the Core Strategy "Growth Area" policy in the Sustainability Appraisal viewed as being a serious issue for the Plan's soundness.
2. Access to the South Pennine Moors: • Was a need for Keighley residents to have access to the South Pennine Moors. • Could be achieved by facilitating footpaths and rights of way along natural routes out of the town such as North Beck.
3. Loss of cultural and industrial heritage: • Plan should seek to address the destruction of the area's cultural and industrial heritage.
4. Flood risk and water management: • Inclusion of spatial priority 9 relating to the need to avoid increasing flood risk and managing land and river catchments for flood mitigation was welcomed.
5. Supporting the Leeds City Region Spatial Priority Areas (SPAs): • Noted that the Plan supports the implementation/delivery of the Leeds City Region Spatial Priority Areas (SPAs). • Six of these SPAs are within Bradford District (Bradford City Centre, Canal Road Corridor, Keighley, Shipley, Apperley Bridge/Esholt and Holme Wood urban extension. • Suggested the plan would benefit from making greater reference to the SPA's and their relevance to numerous policy areas. • The Council was highlighted having made commitment to the SPAs and their importance via the Leeds City Region Statement of Community Ground (SoCG) including in respect of matters 7 (Inclusive Growth), 13 (Housing) and 21 (Transport).
6. Meeting housing need and role/status of Cottingley: • Broad principles of the policy were supported as was the identification of Cottingley as a Local Service Centre. • Concerns were expressed regarding the Plan's soundness in reference to meeting the identified housing. • Not considered that deviation from the Standard Methodology would likely result in a Plan that identifies and allocates sufficient sites to meet local housing need.
7. Delivering transformation of the district: • Policy was noted as seeking to transform the district's economic, environmental, physical and social conditions, implying a step change from its current position.

- The Plan needs to be more positively prepared and more ambitious in what it seeks to achieve to make such a step change.
- Approach within the policy requires significant improvements to Bradford City Centre including new green space and improved transport connections (including rail/mass transit) across the district.
- More employment opportunities within the city centre would be a key part of transforming the district as would more new B class development in key transport corridors.

8. Role within the Leeds City Region:

- Spatial priorities/objectives relating to enhancing the district's role within the Leeds City Region as a key employment location, maximising the proximity to Leeds Bradford Airport, the roles the main settlements and protecting the environmental resources were also supported.

9. Reliance on previously developed land and housing delivery:

- The priority given to the use of previously developed land as a means to limit greenfield release, as set out in the NPPF, was supported in principle.
- Needed to be appreciation of the risks involved in relying on complex city centre brownfield sites to support housing delivery.
- Due to the tightly drawn Green Belt boundaries around the much of the district and scale of growth required, the capacity of main urban areas including brownfield sites could not accommodate the land required for 41,400 dwellings (2,300 dwelling per annum) by 2038.
- Exceptional circumstances for Green Belt release were considered to exist in principle, albeit to a greater extent than proposed.
- Despite an increase in the city centre's population due to the delivery of flats, the overall requirement for the Plan was a significant increase from delivery in previous years.
- Accordingly, decisions needed to be made in line with the NPPF and land located within the Green Belt that performs poorly against the five purposes and scores well against regeneration credentials should be considered as suitable sites to help deliver the necessary housing mix across the district and in a viable way.

Representation IDs: 288, 783, 1201, 1503, 1874, 1904, 2446, 2604, 2732, 2831, 3273, 3352 3461, 3670, 3763, 3885, 4868, 5111, 5322, 5364, 5499, 5688, 5901, 5906, 6755, 9795, 10938, 11370, 12163, 13884, 15818, 16260, 16319, 16715, 16953, 17162, 17168, 17409, 17495, 17675, 18917, 18927, 18937, 18947, 19759, 19805, 19833, 21787, 21879, 21908, 21937, 21966, 21995, 22024, 22056, 22085, 22114, 22143, 22183, 22212, 22241, 22270, 22299, 22328, 22357, 22468, 22497, 22526, 22555, 22593, 22622, 22651, 22680, 22709, 22738, 22782, 22811, 22849, 22878, 22907, 22936, 22965, 22994, 23023, 23052, 23108, 23137, 23166, 23195, 23224, 23253, 23282, 23311, 23340, 23369, 23398, 23427, 23602, 24114, 24158, 24197, 24310, 24339, 24368, 24397, 24428, 24457, 24542, 24571, 24620, 24695, 24733, 24762, 24840, 24885, 24927, 24956, 24985, 25015, 25045, 25079, 25130, 25177, 25184, 25213, 25425, 25474, 25703, 25732, 25761, 25790, 25819, 25848, 25877, 25906, 25935, 25964, 25993, 26022, 26051, 26080, 26109, 26138, 26167, 26196, 26225, 26254, 26284, 26319, 26348, 26561, 26676, 26708,

26751, 26794, 26823, 26852, 26881, 26910, 26941, 26970, 27002, 27031, 27060, 27113, 27142, 27171, 27200, 27229, 27261, 27290, 27319, 27348, 27377, 27406, 27435, 27541, 27557, 27682, 27716, 27789, 27820, 27884, 28125, 28183, 28273, 28503, 28668, 29049, 29173, 29206, 29559, 29599, 29930, 29932, 29998, 30079, 30139, 30162

2.6 POLICY SP3: HIERARCHY OF SETTLEMENTS

Overview

The use and articulation of a settlement hierarchy in guiding and controlling the distribution of growth and development is a well-established planning tool and plays a key role in establishing a sustainable pattern of growth and development across the district. While broadly in line with the approach of the former Regional Spatial Strategy, the Core Strategy made some adjustments to the overall settlement hierarchy approach to include Bingley as a Principal Town and introduced a tier of 'Local Growth Centres' between the Principal Towns and much smaller Local Service Centres following a detailed settlement study and the practicalities of the land supply situation at the time.

Policy SP3 essentially carries forward and slightly refreshes the principal themes within SC5 from the Core Strategy and seeks to both identify the key differences in scale and nature of development envisaged between the different parts of the district and give a more spatially specific outline of the key priorities for plans, strategies and investment decisions at each tier of the settlement hierarchy.

In total, **218** representations from **211** respondents were submitted in relation to Policy SP3. These were received from local residents, developers, landowners, agents, Town/Parish Councils, local/sub-regional environmental groups, Government agencies (Environment Agency, Highways England, Historic England, Natural England), businesses, a resident's group, a neighbouring local authority, Chamber of Commerce, elected members and a sub-regional body (West Yorkshire Combined Authority).

Table 2.6.1: Question 4 - Policy SP3: Hierarchy of Settlements - Summary of Representations Received

Consultation Question 4 – Policy SP3: Hierarchy of Settlements				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
218	**211**	**168**	**41**	**9**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Shipley – potential heritage impacts • Principal Towns – policy wording suggestion • Local Growth Centres – policy wording suggestion	The Council has reviewed the multiple representations made on this policy and these have been considered in the justification and drafting to a revised Spatial Strategy – Policy SS1 in Section 3 of the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments, and changes to national policy / guidance.

• Local Service Centres/rural areas – policy wording suggestion • Objections to settlements level of growth within hierarchy: Burley in Wharfedale, Menston, Thornton, Queensbury, Silsden, Wilsden • New build design • Open space • Infrastructure • Objections to Paragraph 3.3.9 • Some support for the policy • Support for Principal Towns • Support for Local Service Centres and rural areas • Support for settlements Keighley, Shipley, Burley in Wharfedale, Silsden, Queensbury, Addingham • Support for Paragraph 3.3.11 • Comments on settlements: Burley in Wharfedale, Bingley, Cottingley, Addingham • Employment – reference to Local Growth Centres and opportunities • Transport – hooks to other polices	

Summary of Representations
Objections:
1. Shipley • Concern for the proposed level of development in the town and potential harm on the UNESCO world heritage site of Saltaire, • The policy should make it clear that housing sites around Saltaire will be required to safeguard its universal value. Under Caveat B add the following *"Safeguard those elements which contribute to the Outstanding Universal Value of Saltaire"*
2. Principal Towns

• The second sentence of criterion C is not clear. Amend to read "*Potential for growth will be informed by the existing scale of the settlement, the contribution made by environmental and heritage assets as appropriate to their importance and flood risk issues.'*
3. Local Growth Centres • Criterion 1 should be amended to read *'Achieve a high standard of design that protects and enhances settlement and landscape character and distinctiveness.'*
4. Local Service Centres/rural areas • Criterion 1 should be amended to read *'Achieve a high standard of design that protects and enhances settlement and landscape character and distinctiveness.'*
5. Burley in Wharfedale • Burley in Wharfedale was only reinstated as a local growth area following the involvement of a site promoter in the Habitats Regulation Assessment and had a vested interest in the area without declaring this. This meant that the housing target increased for the village. • Burley in Wharfedale should not be a growth centre as there is no prospect of employment growth in the area - it is a commuter town where people travel to work in other areas
6. Menston • Menston should not be a growth centre as there is no prospect of employment growth in the area - it is a commuter town where people travel to work in other areas. • Limited space to expand without green belt release- housing target should be reduced as it falls within 2.5km of the SPA
7. Thornton • Village is not well connected to public transport- there are no buses to Queensbury or Halifax and Clayton which is 7 mins by car takes 55 mins on the bus.
8. Queensbury • Queensbury can accommodate 1000 homes as per the adopted core strategy
9. Silsden • The case for Silsden to be a local growth centre has not been proven. It seems development has been allocated to Silsden on the basis of easily developable fields rather than on housing need
10. Wilsden • Wilsden is well located to principal towns and should be allocated a greater proportion of growth

11. New build design

The policy does not pay attention to the need to “green up” houses- new builds should be carbon neutral

12. Open space

- The idea that new and improved open spaces can be created when building on green belt land is contradictory.
- Aims for greenspaces are not compatible with the proposal to build on greenfield sites.
- There is potential in the more rural parts of the district to create open spaces to enhance biodiversity by growing food- community orchards- B3 could be reworded to read *“Create new and improve existing open space, green areas, networks and corridors including the urban fringe to enhance biodiversity, food growing and recreation”*

13. Infrastructure

- Infrastructure should be delivered first

14. General

- The policy text is similar for each tier which makes it difficult to discern how decisions will be made in the different locations. Policy could be simplified by identifying the levels in the hierarchy then saying that in each level of the hierarchy the allocation and development of land and buildings would seek to enhance the following considerations: “*· the capacity of the settlement to accommodate development; · the character of the place and neighbourhoods within it; · high standards of design of buildings and the public realm; · connectivity and maximising opportunities for take-up of sustainable and active travel modes; enhancing the quantity and quality of green infrastructure; · and enhancing the vitality of the place as a whole, and neighbourhoods within it.”*
- Lack of a vision for the future of Bradford's rural areas. Currently the only concession to rural areas in the settlement hierarchy is through supporting broadband and live work and home working - neither of which are exclusively rural considerations.
- The approach is outdated- a new settlement study which factors in capacity should determine the hierarchy.
- Account should be taken of the impact of the Covid pandemic on the way people work and live.
- The policy needs to contain greater emphasis on cross boundary working where it refers to the wider highway network

15. Paragraph 3.3.9

- Burley in Wharfedale has affordability issues and the reference in the para to the need for affordable homes should mean that it is provided in the village not as a contribution to be spent elsewhere.
- What employment opportunities does the council believe exist in Burley in Wharfedale?

Support:

1. General

- Subject to qualification on how other policies will be changed to deliver the benefits for settlements sought.

• Support for directing a large proportion of the development to the city and Shipley/canal road corridor to meet economic ambitions. • Agreement that Principal towns should be supported as areas for employment to support existing and new jobs. • Policy sets out where development is not needed and thus protects from development but concern that in Ilkley the development may harm community cohesion. • There should be more honesty over why decision not to allocate the homes target by population proportion has not been taken. • Support for hierarchy as proposed and that Local Growth Centres should take a significant contribution. • Support for hierarchy as proposed in that Local Service Centres take less growth which will enhance biodiversity. • Support but the policy overlooks the importance of access to green spaces which should be inclusive and sustainable and accessible for people using public transport. • Settlement boundaries need to be revised where new sites are allocated on the edge. • Settlement hierarchy seems logical and informed by accessibility and connectivity
2. Principal Towns • Support for each principal town as a focus for housing, employment, shopping, leisure, education, health and cultural activities which should be enhanced
3. Keighley • Support for inclusion of Riddlesden within the Principal town
4. Shipley • Support for Shipley as one of the areas primarily focussed on growth
5. Burley in Wharfedale • The identification of Burley in Wharfedale as a local growth centre us appropriate and consistent with the core strategy
6. Silsden • Silsden's role as a local growth centre is supported- Silsden is a highly sustainable settlement with strong links to nearby larger towns
7. Queensbury • Queensbury's inclusion as a local growth centre is supported. It is of a scale and has the range of services to achieve this status in the settlement hierarchy
8. Addingham • Support for inclusion of Addingham as a Local Service Centre and agreement that development should protect and enhance landscape and character

9. Local Service centres and rural areas • Support for reference to appropriate scale development which will ensure they will remain vibrant and dynamic places to live to support employment diversification and retention of local services
10. Paragraph 3.3.11 • Para 3.3.11 should be revised to include need for/retain community facilities
Comments
1. Burley in Wharfedale • Unclear how affordable home delivery addresses the needs of those living in other parts of the district- payment in lieu of delivery undermines policy HO5
2. Bingley • Appropriate as a Principal town
3. Cottingley • Appropriate as a local service centre but the single allocation will not provide protection of local character or a balanced growth strategy and would be disproportionate in scale to the existing urban area. Small Medium Enterprise housebuilders can ensure more locally distinctive development across the plan period
4. Addingham • Addingham has a historic road network with congestion which is a safety issue for residents. Correct that the village has a reduced scale of development
5. Employment • The policy could be strengthened by more explicit reference to local growth centre employment opportunities and community infrastructure to reduce car travel
6. Transport • We are encouraged that the policy contains hooks which dovetail with the West Yorkshire Transport Strategy and draft West Yorkshire Connectivity Infrastructure Plan and directs growth to the main centres which is consistent with other partner councils and aligns with transport priorities

Representation IDs: 792, 1182, 1212, 1905, 2458 ,2541, 2737, 2854, 3385, 3455, 3671, 3771, 3904, 4148, 4258, 4454, 4654, 5113, 5146, 5314, 5378, 5422, 5498, 5687, 5907, 5940, 6757, 9796, 10939 ,11371, 12164, 15769, 5830, 16261, 16329, 16716, 16954, 17169, 17226, 17419, 17496, 17676, 18380, 18386 18918, 18928, 18938, 18948, 19760, 19806, 20138, 21606, 21644, 21649, 21654, 21788, 21880, 21909, 21938, 21967, 21996, 22025, 22057, 22086, 22115, 22144, 22184, 22213, 22242, 22271, 22300, 22329, 22358, 22469, 22498, 22527, 22556,

22594, 22623, 22652, 22681, 22710, 22739, 22783, 22812, 22850, 22879 ,22908, 22937, 22966, 22995, 23024, 23053, 23109, 23138, 23167, 23196, 23225, 23254, 23283, 23312, 23341, 23370, 23399, 23428, 23603, 23630, 23632, 24115, 24159, 24198, 24311, 24340, 24369, 24398, 24429, 24458, 24543, 24572, 24602, 24621 ,24696, 24734, 24763, 24841, 24886, 24928, 24957, 24986, 25016, 25046, 25080, 25131, 25178, 25185, 25214, 25417, 25426, 25475, 25704, 25733 ,25762, 25791, 25820, 25849, 25878, 25907, 25936, 25965, 25994, 26023, 26052, 26081, 26110, 26139, 26168, 26197, 26226, 26255, 26285, 26320, 26349, 26562, 26677, 26709, 26752, 26795, 26824, 26853, 26882, 26911, 26942, 26971, 27003, 27032, 27061, 27114, 27143, 27172, 27201, 27230, 27262 ,27291, 27320, 27349, 27378, 27407, 27436, 27470, 27542, 27558, 27683, 27717, 27790, 27821, 27885, 28184, 28274, 28431, 28515, 28679, 29020, 29050, 29051, 29052, 29053, 29207, 29560, 29600, 29632, 29736, 29931, 29999, 30080, 30140, 30145, 30163, 30284

2.7 POLICY SP4: LOCATION OF DEVELOPMENT

Overview

Strategic policies SP2 and SP3 within the Local Plan envisage a relatively concentrated pattern of development across the district focused primarily but not exclusively on the Regional City of Bradford, together with the Principal Towns of Ilkley, Keighley and Bingley, and smaller levels of growth within Local Growth Centres and Local Service Centres. Policy SP4 builds upon the preferred revisions to the policy (originally labelled SC5 as set out in the Core Strategy Partial Review) and sets a series of locational priorities to support Policies SP2 and SP3 for allocating sites within the Local Plan. The policy is intended to align with the new Strategic Policies SP6 and EC1 (Economic Growth) and SP8 and HO1 (Housing Growth) which set further clear directions for growth.

In total, **210** representations from **204** respondents were submitted in relation to the contents of Policy SP4. These were received from local residents, landowners, developers, agents, Town/Parish Councils, residents' groups, local/sub-regional environmental groups, Government agencies (Environment Agency; Highways England; Historic England; Natural England), Chamber of Commerce, elected members and a sub-regional body.

Table 2.7.1: Question 5 - Policy SP4: Location of Development - Summary of Representations Received

Consultation Question 5 – Policy SP4: Location of Development				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
210	**204**	**176**	**23**	**10**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Need for policy • Caveat A • Caveat B • Green Belt sites • Greenfield sites • PDL sites	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting to a revised Spatial Strategy (SS1) in Section 3 of the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• General objections • General support • Comments on Caveat A, Caveat B • General comments	

Summary of Representations
Objections:
1. Need for the policy • There is no reasoned justification why a sequential or prioritisation policy is necessary. • The policy serves very little purpose and there is no justification as to why a sequential prioritisation of sites is necessary. The supply of PDL in some settlements is severely restricted in the lower settlement tiers other than in unpredictable circumstances
2. Caveat A • The phrase *"not have high environmental value"* is too subjective as some sites have strong potential to become so through biodiversity net gain and urban tree planting schemes. Also, the words "subject to the above" imply that caveat B is less important. • The use of the phrase *"not have high environmental value"* should not be encouraged. The policy should be reworded to read – "1. First priority to the efficient and effective re-use of deliverable and developable previously developed land and buildings, provided that it is not of high environmental value ***and that any heritage assets are appropriately conserved***, and more efficient and effective use of existing developed areas within the City of Bradford, the Principal Towns of Ilkley, Keighley and Bingley, the Local Growth Centres and the Local Service Centres." • The policy should reflect that certain development types are unlikely to be located in non green belt locations- policy should be revised to read - 'Third priority to the release of Green Belt land ***where the locational requirements of particular development necessitate this, to meet identified development need in full and*** as set out under Policy SP5'. • Caveat A(3)- should be reworded to read – "'Third priority to the release of Green Belt land ***in order to meet the remaining identified development need in full and*** as set out under Policy SP5'. • Caveat A(3) should prioritise sites which are in sustainable locations
3. Caveat B • The accessibility approach doesn't consider the needs of different people by age and disability suggest the rewording of the policy to read – **"*Policy SP4: Location of Development A. The Local Plan will adopt a car-free accessibility approach to ensure that new***

development contributes to the strategic target of reducing car use over the plan period. It will do this by locating new development such that it: 1. Makes walking, cycling and public transport the most attractive and useful travel modes for day-to-day journeys, to achieve 15-minute neighbourhoods; 2. Ensures that the pattern of development improves accessibility and independence for all sectors of society; 3. Takes every possible opportunity to create and enhance green corridors for nature, climate response and active travel; 4. Minimises the dependence of development on any additional road capacity that could otherwise induce additional traffic; 5. Maximises the use of rail and water for uses generating large freight movements. B. Having identified how to maximize car-free accessibility, the Local Plan will then maximize the efficient use of land, by allocating sites that: 1. are compatible with the settlement hierarchy; 2. give first priority to the re-use of brownfield and under-utilised land within settlements, and second priority to greenfield sites within settlements, while ensuring that development of those does not harm environmental assets or public space; 3. are suitable for development at a minimum of 50 dwellings per hectare net. C. Where there are insufficient sites within settlements, land will be identified for release from the Green Belt adjacent to settlement boundaries, as set out in policy SP5, so long as those sites fulfil the three criteria in SP4 A and B above."

4. Green Belt sites

- The use of the phrase "prioritisation of green belt release" as opposed to "prioritisation of green belt protection" is concerning.
- The policy appears to contravene the aim to maintain green belt boundaries.
- In order to minimise development on the green belt, the council should increase density in urban areas.
- PDL in the green belt should not be excluded from consideration for development and be inserted between priority 1 and priority 2.
- The NPPF states that Local Authorities should maximise brownfield sites before releasing green belt- Bradford Council is not maximising brownfield sites and has provided insufficient evidence that all options have been explored.
- Very special circumstances have not been sufficiently provided to justify why green belt sites have been released.
- Green belt land which performs poorly against the 5 purposes and scores well in terms of regeneration should be considered as suitable.
- Poor viability of brownfield land should not be a reason to accept the government's 35% uplift as this will place greater pressure on green belt

5. Greenfield sites

- There should be no prospect of using greenfield sites within the city of Bradford given the importance of open space for health, biodiversity, flood risk- water soakaway

6. PDL sites

- There should not be an over reliance on PDL (brownfield) sites which can be unviable which will mean the council will not identify a sufficient supply of deliverable and developable land

7. General

- Reword the policy to read – ***"Policy SP4: Location of Development A. The Local Plan will adopt a car-free accessibility approach to ensure that new development contributes to the strategic target of significantly reducing car use over the plan period. It will do this by locating new development such that it: 1. Makes walking, cycling and public transport the most attractive and useful travel modes for day-to-day journeys, to achieve 15-minute neighbourhoods; 2. Ensures that the pattern of development improves accessibility and independence for all sectors of society; 3. Takes every possible opportunity to create and enhance green corridors for nature, climate response and active travel; 4. Minimises the dependence of development on any additional road capacity that would otherwise induce additional traffic; 5. Maximises the use of rail and water for uses generating large freight movements. B. Having identified how to maximize car-free accessibility, the Local Plan will then maximize the efficient use of land, by allocating sites that: 1. are compatible with the settlement hierarchy; 2. give first priority to the re-use of brownfield and under-utilised land within settlements, and second priority to greenfield sites within settlements, while ensuring that development of those does not harm environmental assets or public space; 3. are suitable for development at a minimum of 50 dwellings per hectare net. C. Where there are insufficient sites within settlements, land will be identified for release from the Green Belt adjacent to settlement boundaries, as set out in policy SP5, so long as those sites fulfil the three criteria in SP4 A and B above".***
- The policy infers that the prioritisation approach will be applied separately to each named settlement- with the implication that if there are no PDL or greenfield sites then green belt will be automatic. Some settlements have a surplus of sites and therefore less green belt release.
- The Council should focus its resources on regenerating former council estates and development on public land rather than greenfield and greenbelt sites.
- In order to address the climate emergency- there needs to be a significant reduction in car use- the policy should be reworded to include the wording ***"The Local Plan will adopt a car-free accessibility approach to ensure that new development contributes to the strategic target of reducing car use over the plan period. It will do this by locating new development such that it: ● Makes walking, cycling and public transport the most attractive and useful travel modes for day-to-day journeys, to achieve 15-minute neighbourhoods with the creation of gold-standard segregated infrastructure and low traffic neighbourhood principles; ● Ensures that the pattern of development improves accessibility and independence for all sectors of society: ● Minimises the dependence of development on any additional road capacity that could otherwise induce additional traffic; ● Maximises the use of rail and water for uses generating large freight movements".***
- Locations for development should not be solely dictated by transport and infrastructure. Also important is access to drainage, sewage and energy.
- Policy should be incorporated in to Policy SP3 with a new policy which refers to development requirements and delivery trajectory.
- Nature recovery should be recognised as a consideration through and appropriate item under caveat B as per footnote 57 to paragraph 174a of annex A of the NPPF
- In order to reduce car mileage by 2038 the local plan needs to focus development into 15-minute developments and promote mixed use development rather than single use development

Support:

1. **General**
   - Support for re use of land and green belt being the last option but it should still be protected.
   - The approach is logical although in Addingham- the sites chosen are in the least sustainable part of the village.
   - Support for greater consideration of sustainable transport but the wording could be further strengthened. Current development locks residents into car dependency given poor location in relation to other forms of transport.
   - Support for the policy providing that the aspirations have robust transport evidence base.
   - The policy is supported but additional text is required to state that sustainable non green belt locations on sites adjacent to the settlements will also be supported - Caveat A (2) should read - "Second priority to sustainable Greenfield opportunities within ***and adjoining*** the settlements" & Caveat A (3) should read – "Third priority to the ***limited*** release of Green Belt land ***in sustainable locations, as set out under Part B of this policy***".
   - The local plan should provide a balanced portfolio of development opportunities and recognise that appropriately located greenfield sites can be sustainable

Comments

1. **Caveat A (3)**
   - This should refer to green belt release around the regional city, principal towns and local growth centres as this is where the majority of it lies.
   - Caveat should be reworded to read – *"Third priority to the **limited** release of Green Belt land **in sustainable locations, as set out under Part B of this policy**"*

2. **Caveat B (5)**
   - Comment made on prospect of more commercial development

3. **General**
   - Avoid using both "brownfield" and "PDL" in the plan.
   - The housing requirements for the Local Authority should be urgently reviewed to allow the LPA to be able to deliver a robust supply of housing land in accordance with the accessibility-oriented approach advocated.
   - Support for the term "not of high environmental value" but without explaining how for PDL sites this will be determined as some PDL near to rivers even in a poor state still has high environmental value. Potential to unlock value through development should be considered when determining site selection

Representation IDs:

289, 793, 1067, 1875, 1906, 2465, 2739, 2763, 2869, 3243, 3483, 3672, 3773, 3908, 4153, 4276, 4443, 4657, 5029, 5116, 5439, 5497, 5909, 5946, 6089, 6760, 9797, 10942, 11372, 12165, 13319, 13810, 16263, 16330, 16717, 16955, 17163, 17170, 17241, 17420, 17497, 17680, 18018, 18381, 18919, 18920, 18929, 18930, 18939, 18940, 18949, 18950, 19834, 21607, 21789, 21881, 21910, 21939, 21968, 21997, 22026, 22058, 22087, 22116, 22145, 22185, 22214, 22243, 22272, 22301, 22330, 22359, 22470, 22499, 22528, 22557, 22595, 22624, 22653, 22682, 22711, 22740, 22784, 22813, 22851, 22880, 22909, 22938, 22967, 22996, 23025, 23054, 23110, 23139, 23168, 23197, 23226, 23255, 23284, 23313, 23342, 23371, 23400, 23429, 23588, 23604, 23659, 24116, 24160, 24199, 24312, 24341, 24370, 24399, 24430, 24459, 24544, 24573, 24603, 24622, 24697, 24735, 24764, 24842, 24929, 24958, 24987, 25017, 25047, 25081, 25106, 25132, 25179, 25186, 25215, 25309, 25419, 25427, 25476, 25659, 25705, 25734, 25763, 25792, 25821, 25850, 25879, 25908, 25937, 25966, 25995, 26024, 26053, 26082, 26111, 26140, 26169, 26198, 26227, 26256, 26286, 26321, 26350, 26563, 26678, 26710, 26753, 26796, 26825, 26854, 26883, 26912, 26943, 26972, 27004, 27033, 27062, 27115, 27144, 27173, 27202, 27231, 27263, 27292, 27321, 27350, 27379, 27408, 27437, 27543, 27559, 27684, 27718, 27791, 27822, 27886, 28185, 28275, 28532, 29054, 29158, 29175, 29208, 29561, 29601, 29814, 30000, 30081, 30164, 30285

2.8 POLICY SP5: GREEN BELT

Overview

Policy SP5 sets a clear strategic direction on Green Belt and links through to supporting thematic policies and Section 5 of the draft plan. It provides the exceptional circumstances case for the proposed release of housing and employment sites from the Green Belt and mitigation measures to offset the impact of removing land from the Green Belt.

In total, **293** representations from **270** respondents were submitted in relation to the contents of Policy SP5. These were received from local residents, landowners, agents, developers, Town/Parish Councils, residents groups, local/sub-regional environmental bodies, local/national heritage groups/bodies, Government agencies (Environment Agency; Highways England; Historic England; Natural England), neighbouring local authorities, elected members, a Member of Parliament and the Chamber of Commerce.

Table 2.8.1: Question 6 - Policy SP5: Green Belt - Summary of Representations Received

Consultation Question 6 – Policy SP5: Green Belt				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
293	**270**	**249**	**32**	**12**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Additional release of land • Aims and objectives of Green Belt • Area/Settlement specific list of sites • Area/Settlement specific / Exceptional circumstances • Area/Settlement/Site specific • Boundaries • Brownfield land • Brownfield land/housing supply	The Council has reviewed the multiple representations made on this policy and these have been considered in the justification and drafting of revised Policy ST5: Green Belt in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Character of villages • Climate change • Compensatory improvements • Consultation process • Consultation/heritage • Countryside • Cross border issues • Employment requirement • Environment • Environment biodiversity • Exceptional circumstances • Finance and profit • Focus for development/brownfield land • General comments • Green Belt/Greenfield land • Green corridors • Greenspace • Greenspace, Health and Well-being, Climate Change • Historic towns • Housing density • Housing distribution • Housing requirement • Housing uplift • Infrastructure • Landscape • Maintenance • National Policy – Flexibility/Rapid change • Neighbourhood Plan Judgement	

• Policy aims • Reasonable alternatives • Regeneration funding • Safeguarded land • Social Housing • Sustainable Development • Transport • Unoccupied homes • Urban sprawl • Support area/settlement/site specific • Brownfield land/regeneration • Delay release • General comments • General extant of Green Belt • Windfall allowance • Agricultural land/ re-wilding • Compensatory improvements / Policy layout • Housing land supply • Infrastructure • Safeguarded land	

Summary of Representations
Objections:
1. Additional release of land • The case for exceptional circumstances is accepted, but more Green Belt land should be released to meet the higher levels of need and demand for both housing and employment.
2. Aims and objectives of Green Belt

- Building on Green Belt land is in contravention to the Government's aims and objective as set out in the National Planning Policy Framework to prevent urban sprawl and keep land permanently open.

3. Area/Settlement specific

- Objection to the list of sites identified in Policy SP5. Some sites are inappropriate, and there are additional sites that should be added to the list.

4. Area/Settlement specific / Exceptional circumstances

- Exceptional circumstances have not been justified for development in the Green Belt on the edge of Shipley/ There is underutilised land nearer Shipley Town Centre which should be used.
- There are no exceptional circumstances for the number of Green Belt sites identified for development in Addingham. The increase in the housing target for Addingham is unjustified.
- Exceptional circumstances have not been clearly demonstrated for the large releases in Wharfedale.
- Agree that the evidence base is clear that exception circumstances exist to accommodate the level of housing identified for Shipley.
- Agree that the evidence base is clear that exception circumstances exist to accommodate the level of housing identified for Ilkley.
- Agree that the evidence base is clear that exception circumstances exist to accommodate the level of housing identified for North West Bradford.
- Agree that the evidence base is clear that exception circumstances exist to accommodate the level of housing identified for the Regional City of Bradford.
- Exceptional circumstances have not been met for IL1/H, IL2/H, and IL3/H.

5. Area/Settlement/Site specific

- Oppose development in Apperley Bridge, Baildon, Low Moor Farm sites, Thackley, Bolton Woods, Esholt, Eccleshill and Undercliffe.
- It has not been shown that Ilkley's housing needs warrant releasing Green Belt land in accordance with the NPPF.
- Building on Green Belt sites in Ilkley will have a significant impact on the openness. It will increase the likelihood of Ilkley and Burley-in-Wharfedale encroaching on each other.
- The quantity of Green Belt land to be release on the east side of Ilkley does not meet the NPPF aims and there is no explanation of the exceptional circumstances.
- The release of Green Belt land to build housing around the top end of Clayton is wholly inappropriate. The highway network and infrastructure in Clayton cannot accommodate further development. There are sections of the roads without footpaths.
- The cumulative impact of small Green Belt releases adds up. In Bingley, Cottingley and Shipley this will result in the merging of settlements.
- Proposal to build on five areas of Green Belt in Addingham is in conflict with the smaller scale of development expected in local service centres.
- The proportion of sites allocated on Green Belt land in Ilkley is much greater than other principal towns such as Bingley and Keighley. The number of Green Belt sites in Ilkley should be reduced to just IL2/H.

- Object to housing development on IL3/H Coutances Way because it is prone to flooding, the green belt provides good visual benefit to the majority of people. The site is so visible from major roads and the railway. This land could be improved as green belt for nature, habitat, soaking up rainfall, adding hedges and trees. Agree there is a need for more car parking near Ben Rhydding station and a small part of IL3/H could be used for this.
- Addingham has a significant number of Green Belt release sites - particularly on the western side and these are unsustainable as they are a notable distance from services in the village and are likely to encourage short trip car journeys. Addingham should have a lower level of provision and exclude sites AD1/H, AD6/H and AD7/H.
- Destruction of the Green Belt will significantly harm the character and appearance of Addingham, both in long distance views and from Silsden Road and Moor Lane.
- Site ME1/H is in the Green Belt, consists of a north facing hillside, is within 2.5km of the South Pennines Moor and development would overshadow the existing settlement on Hargrave Crescent and Derry Lane.
- Objects to the omission of Land between Bingley Road and Woodfield Road, Cullingworth from the preferred housing site allocations and its retention in the Green Belt. Object to site CU3/H being removed from the Green Belt and allocated.
- Site SE/110 should be removed from the Green Belt and allocated for housing. An assessment against Green Belt purposes shows the site scores low for 3 out of the 5 purposes. The site is of low quality and is characterised as urban fringe.
- There is a significant shortfall in non-green belt employment land against the requirement. No potential land supply of large non-green belt sites or strategic sites has been identified. Site BU/015 Land off Burley Bypass provides a suitable Green Belt release option for employment in Wharfedale, where ther are currently no employment allocations. The site is well contained and would not impact on the function of the surrounding Green Belt (through unrestricted sprawl, encroachment or coalescence).
- The Green Belt boundary around NuFarm UK Ltd should be amended to remove this land from the Green Belt and given no designation. This should be recommended as a proposed change in policy SP5. Compensatory improvements should not apply to this Green Belt release.
- If Sun Lane (BU1/H) proceeds this will cast doubt on the more critical requirements in the plan e.g. green belt last choice for development, required infrastructure, lack of likelihood of flooding.
- Burley has almost reached its original target without the development of the Green Belt site at Scalebor House (BU2/H). Targets have been missed elsewhere in the district. Burley should not take the overflow. There are 5000 unoccupied properties in Bradford, acres of unviable land and brownfield sites.
- Object to the proposed site allocations listed in the policy as the strategic case for exceptional circumstances has not been demonstrated.
- In relation to site NE22/E and NE23/E the CPRE's response to planning application 19/02504 should be referred to setting out concerns but recognising the need to re-use previously developed land.
- Queensbury Golf Course should be identified for release from the Green Belt.
- Although Queensbury Golf Course was not previously put forward it is available, suitable and deliverable. It should be considered as part of the evidence bas and SA. To not do so would represent a major departure from the adopted Spatial Strategy for Queensbury.
- Site NW/020 - Haworth Road, Sandy Lane should be removed from the Green Belt.

- Object to building which infringes on the Green Belt and does not use the many brownfield sites available in the District. Specifically HA1/H. HA2/H, HA3/H, HA4/H.
- Addingham is designated as a small service centre and does not have the infrastructure to support large numbers of additional housing especially at the western side of the village.
- There are two neighbouring sites (WI/003, WI2/H) in Wilsden which are suitable for development and would have negligible impact on Green Belt objectives. Exception circumstances exist to release these sites to meet development needs over the plan period.
- Land south of Shetcliffe Lane, Bierley (SE/129) should be released from the Green Belt and should be allocated for development. It would not materially harm any of the purposes of the Green Belt.
- The partial development of the "Sailor Fields" (AD3/H, AD4/H) between the village and the A65 bypass will destroy the nature of the village and setting of listed buildings. The Green Belt was established to protect the "Sailor Fields". No exceptional circumstances have been put forward for these Green Belt changes. These proposals are contrary to Addingham's Neighbourhood Plan.
- The land south of Shipley Golf Course - site CO/006 - Hazel Beck, Cottingley should be released from the Green Belt. It is a sustainable site with a very weak contribution to the existing Green Belt.
- Land to the south of Brow Road, Haworth should be allocated for housing and removed from the Green Belt. Development of the site would result in a sensible rounding-off of the Green Belt Boundary.
- Land to the west of Micklethwaite Lane should be allocated for housing and removed from the Green Belt.
- The release of IL1/H Ben Rhydding Drive for high density development will detract from the ambience and amenity of the area. The release of the nearby IL3/H Coutances Way will also add pressure to existing amenities, communication and traffic flow.
- Land off Nares Street, Haworth should be allocated for housing and removed from the Green Belt.
- Support the release of Green Belt land at sites IL1/H, IL2/H, IL3/H for sustainable housing development.
- Site IL1/H and IL3/H should not be released from the Green Belt and should not be developed.
- Sites NE22/E and NE23/E should not be allocated as employment sites and not removed from the Green Belt. NE22/E should be removed. NE23/E should only be developed for employment if planning permission is granted on the basis of very special circumstances. It is not necessary to remove the site from the Green Belt and allocate for employment use.
- A further change to the Green Belt is justified south and east of Nufarm UK ltd at Wyke to accommodate a strategically located allocation for employment development and to safeguard additional land.
- There is not very much Green Belt to enjoy locally in South East Bradford except in Tong Valley. It provides an area for exercise, clean air and views. This beautiful area should not be destroyed.
- Policies SP5 and SP15 need to acknowledge that there are exceptional circumstances to release some land from the Green Belt to facilities the hospital's operations (Airedale Hospital).
- There is capacity for further housing to be accommodated on sustainable sites on the edge of Menston which are well served by public transport and do not compromise the purposes of Green Belt.
- The plan is unsound in relation to Green Belt release is Wharfedale. Sites AD3/H, AD4/H, IL1/H, IL3/H & BU1/H will result in virtual ribbon development between Guiseley and Addingham. Creeping urbanisation is a major threat to the environment and the visitor economy.

- Land at Carr Lane, East Morton (EM/012) should be added to the list of sites provided in Policy SP5.
- Object to the inclusion of Site SH4/H and its removal from the Green Belt. Sites SH/044 and SH/048 should be allocated and removed from the Green Belt instead.
- Green Belt areas are safeguarded against development and no account has been taken of the planning white paper which specifically protects green belt and conservation areas. Piecemeal changes across the district are being proposed without first being test by an inspector. The decision at Sun Lane, Burley-in-Wharfedale depleting the Green Belt should be taken into account in any decision to develop any further green belt land between Burlet and Ben Rhydding. It is of prime importance to maintain a separation between the towns and to prevent ribbon development along the A65.
- Object to the omission of the residential site NE/053 at Esholt as a housing allocation. The site reuses previously developed land which is sequentially preferable when considering land to be released from the Green Belt. The fact that the site falls outside of the Bradford North East boundary should not prohibit the site from being allocated. The adjacent site identified for employment use is being allocated. The Esholt development has always been viewed holistically and the site should be allocated for housing in the context of the employment allocation. The holistic approach should be maintained.

6. Boundaries

- The term weak boundaries is meaningless. These boundaries have lasted several decades. Releasing the two areas of green belt in Ben Rhydding does not safeguard or make stronger the adjacent areas. It reduces the green belt between Burley-in-Wharfedale and Ben Rhydding. Describing boundaries as less durable is equally specious - they have lasted for at least 25 years and there is no case to change them. The intention of green belt is that it remains in perpetuity.

7. Brownfield land

- Brownfield sites should be used instead.
- Brownfield sites such as Keighley College building, Marley incinerator site should be used for housing.
- Bradford could meet its minimum annual target through the use of brownfield sites.
- More effort if need to use old industrial areas and under utilised shopping areas instead of Green Belt.
- The council is required to maximise the use of previously developed and under-utilised land and buildings. The council has provided insufficient evidence that all options have been explored.
- There will be more future brownfield sites available in the future as old factories, mills and disused building become vacant and identified.
- The reference to making changes to adopted green belt points to the reality that this plan is about saving Bradford brownfield sites and concreting rural green belt.

8. Brownfield land / Housing supply

- It is important that the development strategy is not overly reliant on brownfield sites. Further allocations are required to redress concerns on undersupply. The Council need to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

9. Character of villages

Green Belt should be maintained to keep the character and appearance of villages.

10. Climate Change

- Green Belt should be maintained to assist fighting climate change.
- If exceptional circumstances are to be demonstrated for Green Belt change this must be done in the context of the need to address climate change, and to achieve significant environmental net gains through developed as required by the NPPF as well as the scale of car traffic reduction required by the WYCA CERP report.

11. Compensatory improvements

- Policy SP5 states that all site to be released from the Green Belt will be required to offset the impact through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The council should set out exactly how and when this should be achieved.
- In relation to Policy SP5 point E on compensatory improvement the following rewording is suggested: “Where land is released from the Green Belt for development the Council will identify compensatory improvements to the environment quality and accessibility of remaining Green Belt that produce a measurable net improvement to the beneficial use of the Green Belt in the same locality as the Green Belts release. This may include inclusion of additional land in the Green Belt in those localities, and/or Local Green Space Designations to protect green spaces within settlements.”
- Criteria E should be amended to read: "Where land is released from the Green Belt for development the Councl will identify compensatory improvements to the environment quality and accessibility or remaining Green Belt that produce measurable net improvements to the beneficial use of the Green Belt in the same locality as the Green Belts release. This may include inclusion of additional land in the Green Belt in those localities, and/or Local Green Space Designations to protect green spaces within settlements."

12. Consultation process

- The Green Belt review should have been fully consulted upon and put before an inspector prior to the overall allocation process. The Green Belt review needs public examination at this stage of the process and brought before the Inspector for examination as the next stage in the overall process, before specific sites are scrutinised and the completed.

13. Consultation / Heritage

- The Green Belt was established to stop urban expansion. In the case of Bradford stopping it merging with Leeds around the Tong area. The proposals to build on the Green Belt are undemocratic as there has not been one survey or opinion poll on the plans. 90% of the population disagrees with the proposals. The new road and housing plans will affect a Grade II house.

14. Countryside

- Countryside will be eroded by new development. Countryside should not be destroyed.

15. Cross border issues

- Development proposals on/close to local authority boundaries should be considered when looking at Ilkley's infrastructure capacity and funding e.g. Middleton Hospital on the Ilkley/Harrogate boundary.

16. Employment requirement

- The Employment need / requirement has not factored in the changes since the Covid pandemic. The shortfall of 5,000 units is excessive and the Green Belt land required should be reduced accordingly.
- The employment needs should be revisited in light of the pandemic and changes in working patterns - to see if land identified for employment use in urban areas could now be used for housing to remove pressure from the Green Belt.
- The economic growth proposals set out in Policy SP6 do not robustly justify the allocation of Green Belt sites for employment. Therefore, exceptional circumstances have not been adequately demonstrated for Green Belt change to supply employment land.

17. Environment

- Developing Green Belt land will have an impact on the Environment, damage wildlife and impact on surface water drainage.
- Point E of Policy SP5 should be strengthened as followed: "All sites identified as being released from the Green Belt will be required to offset the impact of removing land from the Green Belt by: a) identifying opportunities for on-site environmental enhancement and the delivery of environmental net gain through new development. Proposals which increase the beneficial use of the Green Belt, by enhancing green infrastructure, biodiversity, visual amenity and landscape or improving derelict land and opportunities for access, outdoor sport and recreation, will be supported where this does not conflict with Green Belt or other policy objectives."
- Disagree with the plans for housing on Green Belt land especially in a time of climate emergency and where there are brownfield sites available. There will be issues with the destruction of natural land, habitats, leaching noise, light pollution which will cause localised extinctions of many species.

18. Environment – biodiversity

- Unclear how developments in the Green Belt and greenfield will lead to biodiversity net gain as the Council sets out in Policy EN2. Not accepted that such development will lead to biodiversity net gains.
- In order to release green belt there needs to be a net gain for biodiversity. There is no mention of how this can be demonstrated for any of the three sites in Ilkley.
- Erosion of the Green Belt has a negative impact on nature and wildlife.
- More should be made of Green Belt land for enhancing biodiversity, landscape, health and wellbeing. There is a need to engage with local communities to consider how net gain can be created in terms of sustainability - such as tackling unsustainable practices on remaining Green Belt land, enhancing biodiversity, creating wildlife corridors, increasing tree planting. Involving local communities will add social value.

19. Exceptional circumstances

- There are no exceptional circumstances for building on so many Green Belt sites. Exceptional circumstances have not been demonstrated.
- There should be exceptional circumstances before Green Belt boundaries can be changed.
- Green Belt should only be used after all other alternatives have failed and only in exceptional circumstances.
- Disagree with Policy SP5's stated case for the loss of this amount of green belt, citing exceptional circumstances. The pandemic must have increased brownfield site availability through altered working patterns and business changes. This should be revisited and the Valley Road site considered.
- An assessment as detailed in NPPF paragraph 137 should be carried out before concluding that exceptional circumstances exist.
- The definition of exceptional circumstances in the Bradford context should be set out. It is unclear why some many brownfield sites remain unviable 16 years after first being identified.
- The criteria for 'exceptional circumstances' needs to be more clearly defined and the bar set higher.
- The case for exceptional circumstances is contingent on the Local Plan being confident that the resulting pattern of settlement growth for both housing and employment will actively address high-level challenges (e.g. climate actions, environmental net gains etc).
- Green Belt should only be released for housing in exceptional circumstances. Policy SP5 and Policy SP8 are narrative statements which are subjective and are no justification for releasing Green Belt sites for housing,

20. Finance and profit

- Green Belt land is being sold off for profit.
- Developing these sites will reduce the amount of Green Belt and affect property prices.

21. Focus for development / brownfield land

- Houses should be built in Bradford and not in the outlying areas. Sites in Bradford should be regenerated. Developing on Green Belt land in the outlying areas will make these areas undesirable in 20 years' time.

22. General comments

- Building on the Green Belt is not an acceptable plan. Object to developing Green Belt land.
- Building on Green Belt land before all other options have been exhausted is not acceptable or sustainable.
- Allowing development on Green Belt will set a dangerous precedent.
- Object to the plan's conclusions that the amount of land to be released from the Green Belt must be kept to an absolute minimum. The continued application of tight Green Belt boundaries has led to specific problems: 1. continuous household out-migration; 2. increased house prices due to lack of delivery; 3. negative impact on housing delivery; 4. failure to realise environmental/recreation enhancements.

23. Green Belt / Greenfield land

- The use of green belt / greenfield sites is irreversible. Development of these sites will change the character of the countryside. This cannot be supported.

24. Green Corridors

- Will green corridors be formed by developing previously undeveloped green land either side of the proposed new corridor?

25. Greenspace

- Green Belt does not include all open/green spaces but many of these spaces are important for urban residents.

26. Greenspace, Health and Well Being, Climate Change

- Greenspace is vital for health and well being, climate change, and species.

27. Historic towns

- The first part of Policy SP5 should be amended to acknowledge the importance of purpose 4 on historic towns. Criteria A should be amended to read: "A. The extent of Green Belt within the District is identified on the Policies Map and has a valuable role in supporting urban regeneration and transformation, keeping settlements separate, concentrating development, conserving the countryside, and preserving the setting and special character of historic towns."

28. Housing density

- New housing development should be built to the highest densities possible (Strategic Policy SP7). If this is done the amount of Green Belt land to be taken for housing would significantly decrease.
- The policy states that the assessment of non-Green Belt land capacity takes into consideration density levels compliant with Policy HO2. However, analysis of the site indicates an average density of 26dph which well below the 35dph minimum and even further below the 50dph which the CPRE consider should be achieved. There is no rationale for releasing Green Belt land if the result will be 5,000 homes developed at non-policy compliant densities.
- Higher housing densities should be incorporated into the brownfield site allocations.
- The housing density requirements set out in HO2 do not correspond with the site capacity assessments for the sites in the plan.
- Exceptional circumstances have not been demonstrated as site yield have been dictated by developed/the SLA and the 50dph density requirement has not been applied to sites.

29. Housing distribution

- Exceptional circumstances have not been demonstrated as the housing distribution has applied the settlement hierarchy first before the NPPF para 137 tests.

30. Housing requirement

- The analysis of the housing need work indicates that there is no justification for the overall housing target of 1703 dwellings per annum.
- Lack of evidence to show that there is a need for 22,000 houses. There is plenty of scope for converting former commercial premises into apartments. Population growth cannot go unchecked without irreversible environmental damage.
- The Council has produced its own evidence to explain exactly why Wharfedale should be left with its original growth figures.

- The Council should define the areas for proposed Green Belt release required to meet the minimum housing need figure of 2,300 dwellings per annum. The Core Strategy indicates that 11,000 homes will be required to be delivered in the Green Belt. Adopting an annual housing need figure of 2,300 will require a similar level of Green Belt release.
- There is a significant change in the housing requirement between the Core Strategy, Core Strategy Partial Review and the draft Local Plan. The Core Strategy Partial review was an opportunity to safeguard the Green Belt, but the draft Local Plan requires 5,267 dwellings in it. Bradford South will suffer disproportionately with 3,500+ dwellings proposed, 57% of which are in the Green Belt with 1,500 in one area. Given the sensitivity of the Green Bel its use should be minimised, and development density should be towards the higher end.

31. Housing requirement / Housing uplift

- The plan does not identify enough land to meet the OAN or the 35% uplift. It does not remove enough land from the Green Belt to meet the current or future needs.

32. Housing Uplift

- It may be necessary to release further Green Belt in order to meet the government's 35% uplift for Bradford District.
- The 35% uplift is intended to be targeted at urban centres and regeneration. This must be taken to mean that urban centre areas do in fact contain sites that the council anticipate could be brought forward to meet the 35% uplift. If this is the case, then the correct application of the location policy (SP4) would prioritise urban land first. It is unclear how the proposed scale of Green Belt change is needed to support the proposed housing requirement if a further 35% (10,000 dwellings) could be subsequently found within the urban central areas. It is therefore inferred that that there are sufficient inner urban sites to accommodate the uplift, but that adding in the uplift would constitute a significant change to the distribution of new development such that a much larger share of the total goes into urban Bradford.
- The plan does not include the additional government target of 10,500 dwellings. This will have to come from the Regional City. Concern it can only be met from further Green Belt sites in Bradford South.

33. Infrastructure

- Villages do not have the infrastructure to support development on the Green Belt.
- Infrastructure (highways, schools, medical care) cannot cope with increased housing.
- The shift in people using public transport will not occur and public transport will not improve.
- The plan promises to improve infrastructure and conflates this with Green Belt release. No guarantee that these improvements/mitigation will be delivered.
- The area is highly urbanised with overstretched infrastructure. The plan will add a disproportionate burden on communities by removing more accessible Green Belt.

34. Landscape

- The very high quality of Addingham's surrounding landscape is evidenced in the designated Green Belt and its village green spaces. The relationship with landscape and countryside around the village gives it a particular value.

- Plan fails to mention the adjoining Nidderdale Area of Outstanding Natural Beauty (AONB) a major oversight and invalidating many key assumptions in it.
- Green Belt is not necessarily of high landscape value - but in the case of Wharfedale, the sites identified for release are of particular landscape value as they provide the setting to the town and important distant vistas. Views of the green belt area east of Ben Rhydding from across the valley reinforce this attractive rural nature.

35. Maintenance

- Maintenance of Green Belt will need no 'mitigation measures' but it would make sense to see what mitigation might apply in a certain case - such as provision of additional green space nearby.

36. National Policy - Flexibility / Rapid change

- The plan is not in line with the National Planning Policy Framework which states that plans should positively seek opportunities to meet the development needs of their areas and be sufficiently flexible to adapt to rapid change - the pandemic has seen changes in demand for office and retail space and this has not been factored into the plan. The shortfall of 5000 units is excessive and the Green Belt land to be built on should be reduced.

37. Neighbourhood Plan Judgement

- The Aireborough Neighbourhood Development Plan judgement indicated that Green Belt sites should not be included in the plan just because the Council wished to distribute number around the district proportionately - this is relevant to the Bradford Plan.

38. Policy aims

- Stated aims of maximising use of previously developed land and minimising use of Green Belt are not being met.

39. Reasonable alternatives

- No alternative approach is presented, only different ways to how the policy is laid out and the excluding of certain sites from the list. There is no alternative approach for increasing the proportion of new development directed towards brownfield sites; for further increases in residential and employment density as a way to reduce the amount of Green Belt land.

40. Regeneration funding

- The Council should access the government's £100m fund to support developments on public land and the regeneration of council estates.

41. Safeguarded Land

- Object to the exclusion of safeguarded land.
- Any plan proposing allocations or Green Belt release should also include safeguarded land to meet future needs and provide flexibility for non-delivery.

- The policy and policies map should be amended to provide additional releases of Green Belt sites and Safeguarded land allocations to ensure the longevity of the Green Belt.
- The statement at 3.5.27 of the plan conflicts with the policy text which details that exceptional circumstances exist for the release of Green Belt. Clearly if there were suitable, deliverable and available sites in urban areas there would not be exceptional circumstances to support the release of Green Belt.
- Recommend that Safeguarded Land is included within Policy SP5 or as a dedicated policy. Include Safeguarded Land in respect of the SEBAR and Holme Wood urban extension, setting a boundary across the entire site to build in flexibility for delivery over potentially multiple plan periods in the interests of effectiveness and positive plan making.

42. Social Housing

- Building social housing is acceptable as long as it is maintained and any anti-social behaviour is addressed.

43. Sustainable Development

- There should be a positive and proactive approach to enabling residential developments which can offer multiple benefits.

44. Transport

- It is inappropriate to propose Green Belt release before the viability and line of the SEBAR have been established.
- The mention of the South East Bradford Access Road is welcomed but it is noted that this is only included in the pretext and not the policy itself. The policy should be more explicit to mention the committed SEBAR and that it is still an aim of Bradford with further detail provided on the projected route.
- Highways England does not support the release of sites within the Green Belt as they are likely to be unsustainable in terms of their location and reliance on single occupancy private vehicle trips. If these sites emerge through the Local Plan process then they should be supported by a robust transport evidence base.

45. Unoccupied homes

- The amount of unoccupied housing should be factored into the housing allocation figures. (In calculating the housing requirement figure ahead of finding new land allocations, the number of vacant dwellings should be subtracted from the overall total as well as unviable brownfield sites).
- Empty homes should be brought back into use.

46. Urban Sprawl

- Green Belt has the purpose of preventing urban sprawl. There is little open countryside between Ben Rhydding and Burley-in-Wharfedale. Ilkley is constrained by the moor to the south and Nidderdale AONB to the north. The only 'spare land' in Ilkely is to the east and west and creates semi-detached ghettos at considerable distance from services and infrastructure.

Support:

1. Area / Settlement / Site specific

- Support for the removal on land from the Green Belt, especially at Heights Lane, Eldwick. There is a need for housing in Bingley.
- The sensible adjustments to the Green Belt are welcomed particular at site AD7/H - Turner Lane/Silsden Road, Addingham.
- PDL sites within the Green Belt have not been considered. The site at Haven Farm, Harecroft is available and ready (provided that it has no greater impact on the green belt than the current factory building). It would constitute a major development of more than 10 houses and should be allocated against Wilsden's housing needs and not be counted as windfall.
- Support the release of land from the Green Belt at Apperley Bridge (NE22/E and NE23/E) as a strategic employment allocation.
- The Green Belt site assessment for site NE19/H is disputed. The site does not perform any role with regards to safeguarding the countryside from encroachment. The release of this site from the Green Belt and allocation for residential development is supported.
- Support for the release of Green Belt land and in particular site QB4/H - Brighouse Road, Queensbury.
- Support for site NW10/H - Allerton Road, Prune Park Lane for release from the Green Belt. The Council cannot demonstrate a five year supply of housing land. The Sun Lane decision confirms this. There is a clear and exceptional need for Green Belt release to meeting the housing need. This site would represent a logical rounding-off of the settlement and no longer serves the five purposes of Green Belt.
- The exceptional circumstances justify the release of the wider parcel of land NW/024.
- Exceptional circumstances exist to justify the removal of green belt land on the eastern edge of Holme Wood to facilitate the delivery of an urban extension.
- Agree that the demand for new employment land is acute and there is a shortage of suitable sites such that exceptional circumstances exist for the release of Green Belt land. This is particularly the case for site SE37/E which is well located near the strategic road network.
- Support the allocation of NW9/H which is a logical site for Green Belt release.
- Strongly support the retention of Green Belt surrounding East Riddlesden Hall which assists in keeping settlements separate, conserves the countryside and in keeping land permanently open.
- Support the allocation of NE23/E as an employment site. The existing employment land supply is poor quality and small in scale, meaning indigenous businesses wishing to scale up their operations may have to leave the district due to lack of choice. The Esholt development offers a unique location - with flat development platform and an attractive surrounding landscape. It is sustainably located in close proximity to Apperley Bridge railway stations, bus routes and local road network. Esholt is hugely important in terms of meeting the employment targets over the plan period. The proposed allocation does not include land which is currently being proposed for the vehicular access to serve the site. The boundary should be revised to safeguard an area around th proposed access route. Without this it could be argued that the site is unachievable as there is no suitable access within the confines of the site.
- Support the allocation of site SW33/H for residential development. The site sits adjacent to the settlement of Clayton, but due to the form of the village, the site would essentially fall within the built form of the village, which would limit the extent of encroachment and minimise sprawl. Its development would not lead to coalescence of settlements. It would represent a logical rounding off of the settlement and its release from the Green Belt would be acceptable as it no longer serves the five Gren Belt purposes.

2. Brownfield Land / Regeneration • Focus should be on the regeneration of brownfield sites, city and district centre regeneration - ensuring vacant properties are reused or redeveloped.
3. Delay release • Green Belt releases should be delayed to ensure regeneration opportunities are encouraged. Also the population projections will change and may reduce the housing requirement reducing the need for Green Belt release.
4. Exceptional circumstances • Agree and support that exceptional circumstances exist to release land from the Green Belt.
5. Exceptional circumstances and Uplift • The uplift requirement does not provide an objective, reasonable and necessary reason for justifying exceptional circumstances - as recent evidence on household projections show housing need is reducing.
6. General comments • Support for the proposed Green Belt releases to provide sustainable sites to deliver the housing and employment requirements. • Support the policy to meet housing need in a sustainable wat which would be least damaging to the purposes and integrity of the Green Belt.
7. General extent of the Green Belt • Support Part A of the policy which states that "the extent of Green Belt within the District is identified on the Policies Map and has a valuable role in supporting urban regeneration and transformation, keeping settlement separate concentrating development and conserving the countryside."
8. Housing Requirement /Housing Distribution • There are reservations about the housing requirement and distribution and the knock-on effects for Policy SP5. The housing requirement should be increased, less development directed to Bradford City Centre, and more land released from the Green Belt.
9. Housing Uplift • The 35% uplift should be resisted as it threatens the Green Belt unnecessarily.
10. Windfall Allowance • Support the reduction in the need to build on Green Belt Land. But this should be reduced further. A windfall allowance should be increased to 500 units per year.

Comments
1. Agricultural land / re-wildling • The problem overall is the declining use for agriculture. To assist the poor areas should we be looking at re-wildling projects in the undeveloped Green Belt?
2. Area / Settlement / Site specific • The housing proposals at Holme Wood have been scaled back compared to previous proposals. The full area should be removed from the Green Belt as it forms a logical extension to the settlement and would help meet the housing need. • Support the removal of site QB7/H from the Green Belt. • Further Green Belt release in Queensbury is feasible without undermining the local and strategic function of the Green Belt. • Concern at the allocation of sites around the Holme Wood area. Particularly in terms of the general encroachment and the reduction of the strategic gap between Leeds and Bradford. Also concern about the significant amount of green belt land that is required for release for five housing sites for 1447 new homes. The overall impact of these sites and the impact of infrastructure provision in Leeds.
3. Brownfield land / Housing supply • Agree best possible use should be made of brownfield land in urban areas in terms of increasing densities. But the challenge to achieve enhanced designs and living conditions is recognised in the plan but the land use / land take implications have not been fully taken into account.
4. Climate change • The plan clearly states the climate crisis needs to be at the fore-front of thinking about how to develop these sites and how t change the approach to housing development to ensure a sustainable future for all.
5. Compensatory improvements / Policy layout • Part E should be subdivided to make the distinction between new development sites which would be required to provide compensatory improvements and other proposals for use of land within the green belt which should be supported only where it is consistent with national policy.
6. Compensatory improvements • Compensatory improvements should be identified for the development sites to be released in order to demonstrate that the impact of removing land from the Green Belt can be offset. The plan should identify specific measures that will de delivered. The PPG makes clear there may be scope for a range of measures informed by evidence of landscape, biodiversity or recreational needs and opportunities.

7. Cross border issues

- It is noted that it is necessary to release Green Belt land to meet housing. This should not compromise the purposes of including land in the Green Belt. This would include considering the affect upon the setting of the landscape character and character of settlements across the border within North Yorkshire.

8. Exceptional circumstances

- In demonstrating exceptional circumstances for the release of sites around Holme Wood from the Green Belt, the council should show that all other options have been exhausted for housing in other locations within the settlement hierarchy.
- Agree that exceptional circumstances exist to justify and require a change to the general extent of the Green Belt as set out in the plan.

9. General Comments

- The approach for Green Belt release is supported.
- Not in favour of new housebuilding but recognise it is needed. Green Belt land should be avoided but may be the only supply left. If developed the houses should be carbon neutral and designed with environmentally friendly boilers, solar panel and are nature friendly including swift bricks etc.

10. Housing requirement / Housing distribution

- To provide a more ambitious housing target the allocations process could be extended across the principle and local growth centre settlements.

11. Housing land supply

- The Local Plan should retain flexibility within its strategic policies and to respond to potential housing land supply shortfalls over the plan period. It may be that more advantageous, sustainable sites exist for example where the five purposes of Green Belt are weak as opposed to poor performing countryside and brownfield sites.

12. Infrastructure

- It is understood that the Council's position is that the improvements to Wakefield Road and Tong Street are sufficient to support the number of homes to be provided on Green Belt land at Holme Wood. Leeds City Council reserve their position to comment on this until further evidence is provided through further consultation and duty to cooperate discussions.

13. Safeguarded land

- The plan does not provide for Safeguarded Land, as such it does not provide for longer term development needs beyond the current plan period.
- It is noted that the current approach is to not safeguard further Green Belt land. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances. Releasing Green Belt for safeguarding would ensure that the district can continue to provide for an appropriate level of growth beyond the plan period. If sufficient land is not safeguarded this may lead to identified needs and pressure being placed on areas outside of the district.

Representation IDs: 135, 267, 268, 290, 492, 857, 868, 891, 923, 1059, 1349, 1352, 1506, 1630, 1632, 1692, 1827, 1907, 1953, 2108, 2246, 2405, 2466, 2744, 2773, 3157, 3227, 3297, 3301, 3382, 3460, 3506, 3673, 3728, 3775, 3788, 3900, 3920, 3922, 4156, 4275, 4468, 4520, 4666, 4797, 4833, 4873, 4886, 4900, 5082, 5095, 5122, 5407, 5424, 5425, 5486, 5496, 5516, 5767, 5808, 5910, 6762, 7530, 9798, 10328, 10943, 11015, 11375, 12166, 13320, 13808, 15755, 15757, 16265, 16336, 16604, 16718, 16747, 16958, 16986, 17113, 17125, 17132, 17164, 17171, 17421, 17516, 17685, 18031, 18034, 18232, 18382, 18562, 18921, 18931, 18941, 18951, 19734, 19761, 19807, 19825, 19835, 20003, 21610, 21764, 21790, 21882, 21911, 21940, 21969, 21998, 22027, 22059, 22088, 22117, 22146, 22186, 22215, 22244, 22273, 22302, 22331, 22360, 22471, 22500, 22529, 22558, 22596, 22625, 22654, 22683, 22712, 22741, 22785, 22814, 22852, 22881, 22910, 22939, 22968, 22997, 23026, 23055, 23111, 23140, 23169, 23198, 23227, 23256, 23285, 23314, 23343, 23372, 23401, 23430, 23497, 23605, 23665, 24117, 24161, 24200, 24313, 24342, 24371, 24400, 24431, 24460, 24545, 24574, 24623, 24698, 24736, 24765, 24843, 24930, 24959, 24988, 25018, 25048, 25082, 25108, 25117, 25133, 25187, 25216, 25245, 25246, 25420, 25428, 25477, 25706, 25735, 25764, 25793, 25822, 25851, 25880, 25909, 25938, 25967, 25996, 26025, 26054, 26083, 26112, 26141, 26170, 26199, 26228, 26257, 26287, 26322, 26351, 26528, 26564, 26625, 26679, 26711, 26754, 26778, 26797, 26826, 26855, 26884, 26913, 26944, 26973, 27005, 27034, 27063, 27090, 27104, 27116, 27145, 27174, 27203, 27232, 27264, 27293, 27322, 27351, 27380, 27409, 27438, 27544, 27560, 27685, 27719, 27792, 27823, 27858, 27887, 27958, 28036, 28126, 28127, 28186, 28237, 28276, 28300, 28361, 28499, 28502, 28521, 28742, 28992, 28993, 28994, 29034, 29055, 29162, 29209, 29562, 29602, 29658, 29703, 29704, 29717, 29791, 29950, 29951, 29952, 29953, 30001, 30082, 30134, 30141, 30165, 30200, 30201, 30264, 30286, 30294

2.9 POLICY SP6: ECONOMIC GROWTH

Overview

Policy SP6 sets out the broad approach to future economic growth and development in the district include the provision of employment land, delivery of the Council's wider economic strategy.

In total, **183** representations from **181** respondents were submitted in relation to the contents of Policy SP6. These were received from agents/planning consultants, local residents, Town/Parish Councils, a local charity, developers, a travel alliance, local/sub-regional environmental organisations, elected members, landowners, a sub-regional body (West Yorkshire Combined Authority), a Chamber of Commerce and a Government agency/body (Historic England).

Table 9.1: Question 7 - Policy SP6: Economic Growth - Summary of Representations Received

Consultation Question 7 – Policy SP6: Economic Growth				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
183	**181**	**162**	**12**	**9**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Economic strategy • Projected growth • Data • Skills and education • Green Belt • Infrastructure • Environment • Policy additions	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting to revised policies Spatial Strategy (SS1) and Growth Requirements (SS2) in Section 3 of the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Policy additions • Projected housing growth • General support • General objections • COVID-19 • Employment distribution	

Summary of Representations
Objections:
Economic Strategy • Lack of alignment between Council's economic strategy and policy SP6 (no specifics provided)
Projected Growth • Objection that housing growth is not specifically linked to economic growth
Data • Disagree with the assertion that the population in lower age groups is growing. • Future employment growth does not seem to be supported by data
Skills and Education • Request that more emphasis is placed on education, retraining, redeploying or upskilling workers
Greenbelt • Greenbelt releases should not be considered for housing; housing should be centred around the identified employment areas to reduce reliance on car. • Request to reconsider the release of greenbelt land for employment use.
Infrastructure • Objection that Policy SP6 is not supported by social, community, transport or digital infrastructure.
Environment

• Objection to the lack of information regarding economic growth and the environment, including jobs which impact on carbon emissions.
Policy Additions • Request to include text that states sites in South Bradford will be preferable for Manufacturing and Distribution given its proximity to the Strategic Road Network.
Other • General objection to the Local Plan (not specific to this policy)
Support:
• General support
Comments
Policy Additions • Request to consider how improving our cultural offer could improve the economy. • Request greater emphasis on small, independent businesses. • Request to include the phrase "land-based industries and economy" to section 5 of the policy
Projected Growth • Housing delivery targets are not aligned with economic growth aspirations.
COVID-19 • Request that policy is checked for appropriateness post-covid.
Employment Distribution • Site allocation patterns should seek to ensure employment allocation is spread evenly throughout the district

Representation IDs: 993, 1877, 1908, 2467, 2746, 2873, 3304, 3530, 3674, 3776, 3924, 4874, 4894, 4927, 5142, 5495, 5818, 5914, 5968, 9799, 10949, 11025, 11392, 13823, 15770, 16719, 17114, 18067, 19772, 19808, 21611, 21791, 21883, 21912, 21941, 21970, 21999, 22028, 22060, 22089, 22118, 22147, 22187, 22216, 22245, 22274, 22303, 22332, 22361, 22472, 22501, 22530, 22559, 22597, 22626, 22655, 22684, 22713, 22742, 22786, 22815, 22853, 22882, 22911, 22940, 22969, 22998, 23027, 23056, 23112, 23141, 23170, 23199, 23228, 23257, 23286, 23315, 23344, 23373, 23402, 23431, 23606, 24118, 24162, 24201, 24314, 24343, 24372, 24401, 24432, 24461, 24546, 24575, 24624, 24699, 24737, 24766, 24844, 24931, 24960, 24989, 25019, 25049, 25083, 25110, 25134, 25188, 25217, 25247, 25429, 25478, 25707, 25736, 25765, 25794, 25823, 25852, 25881, 25910, 25939, 25968, 25997, 26026, 26055, 26084, 26113, 26142, 26171, 26200, 26229, 26258, 26288, 26323,

26352, 26565, 26680, 26712, 26755, 26798, 26827, 26856, 26885, 26914, 26945, 26974, 27006, 27035, 27064, 27117, 27146, 27175, 27204, 27233, 27265, 27294, 27323, 27352, 27381, 27410, 27439, 27545, 27561, 27686, 27720, 27793, 27824, 27888, 27959, 28187, 28277, 28520, 28715, 29023, 29056, 29210, 29563, 29603, 29705, 29772, 30002, 30083, 30142, 30166

2.10 POLICY SP7: PLANNING FOR SUSTAINABLE TRANSPORT

Overview

Policy SP7 establishes the main principles of the Council's approach to tackling key transport issues and forms the strategic approach to creating a sustainable transport network for the district. The main principles are Demand Reduction, Mode Shift/Structural change, Efficiency/Consolidation and Technological/Electric. They will establish the strategic transport planning framework for future development growth through the Local Plan.

In total, **188** representations from **186** respondents were submitted in relation to the contents of Policy SP7. These were received from agents/planning consultants, local residents, Town/Parish Councils, a local political party branch, a resident's group, a travel alliance, a cycling campaign group, local/sub-regional environmental organisations, elected members, developers, a riding society, Government agencies/bodies (Highways England), a sub-regional body (West Yorkshire Combined Authority), a footpath development group (Great Northern Railway Trail Development Group), a Chamber of Commerce and a neighbouring local authority.

Table 2.10.1: Question 8 - Policy SP7: Planning for Sustainable Transport - Summary of Representations Received

Consultation Question 8 – Policy SP7: Planning for Sustainable Transport				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
188	**186**	**156**	**23**	**9**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Policy approach and focus • Lack of transport strategy/policy approach • Addressing transport accessibility for shift workers • Addressing transport provision in Wharfedale • Tackling/Addressing the climate emergency • Traffic hierarchy and provision of car-free developments	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy ST2: Sustainable Movement & Connectivity in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Demand reduction • Enabling cycling provision and reducing car use • Public Transport • Links between housing, employment, transport and infrastructure • Additional provision for cycling • Additional provision for pedestrians • Proposed development in South East Bradford • General support • Ride sharing/e bikes. • Impact on the highway network in Ben Rhydding (Ilkley) • Location of development • Definition of sustainable vehicles • Public transport provision • Provision of EV charging points • Address topographic challenges. • Improving opportunities for walking and cycling • Location of development in Addingham • Improvements to the policy • Clarification of role in supporting rail and mass transit and the wider strategy • Sustainable transport principles and demand reduction • Improved rail connections • Impact on the strategic road network • Supporting and developing a cycle network • Making use of efficiency/consolidation measures and technology changes • Managing demand, technological change and improvements to public transport and active travel networks	

• Provision of Northern Powerhouse Rail (NPR) and Mass Transit • Great Northern Railway Trail • Access to public transport • Location of development • Meeting the needs of equestrians • Encouraging bus usage and active travel • Investment in cycle use in Baildon • Investment in public transport in Baildon • Support for sustainable transport • Cross-boundary Working	

Summary of Representations
Objections:
1. Policy approach and focus: • Policy approach was considered to be reasonable and set out a good strategy; however, it related more to the regional level rather than addressing the need to travel across the district. • The district's travel infrastructure should be the focus and priority of the transport policies, which would then need to align with regional systems. • Noted that the policy states that it will "support" various actions in relation to sustainable transport, which few would object to. • Highlighted that most were not the Council's responsibility to deliver and should be considered as assumptions or a wish list. No sensitivity/risk assessment had been undertaken to determine the impact if such measure did not come forward. • Considered that the policy aim of supporting the shift to sustainable transport was meaningless and that there should be concerted effort, determination and culture change to bring about transformational change.
2. Lack of transport strategy/policy approach: • The transport strategy/policy has not been defined with no set budget or timetable for delivery across the area including Burley in Wharfedale, thus not meeting it is development needs. • Makes it difficult to understand how the Council could respond to rapid change required by the NPPF, if it is not decided, agreed or ring-fenced. This means that Plan was not sufficiently flexible to deal with rapid change.

- Queried when the Council anticipated that the Bradford Transport would be fully documented and funded for public consideration. Noted that the West Yorkshire Transport Strategy had been in place since 2017.
- Lack of a well-established and coherent transport policy indicates that the Plan was not in conformity with section 2 of the NPPF (Paragraphs 7 to 14) covering sustainability.

3. Addressing transport accessibility for shift workers:

- Plan does not address issues faced by a particular sub-set of transport users, namely shift workers.
- Rail and bus connectivity was viewed as being reasonable across the district, but timetabling was not suitable for shift workers, particularly those classed as being in transport poverty. Queried how they would get to employment.

4. Addressing transport provision in Wharfedale:

- Queried whether there were any proposals to address current and future rail capacity issues in Wharfedale.
- New development in Burley in Wharfedale would need to be considered in terms of the area's road infrastructure including within the Wharfe valley and main commuter routes towards Leeds & Bradford**.**
- Noted that the Wharfedale line and the A65 and A660 were at peak time capacity. Developments would bring additional traffic to the networks, which would not be able to cope. No plans were put forward to address this.

5. Tackling/Addressing the climate emergency:

- Considered that the policy set out many desirable outcomes as aims to respond to climate change and the climate emergency. However, greater emphasis should be placed upon it within planning policy.
- Car use needed to be driven down, not allowed to increase to address the climate emergency.
- Suggested that there were few actions that would substantially contribute to tackling the climate and should be remedied in the Local Plan.
- Policy should refer to the Council's and WYCA's net-zero carbon policy and its implications for transport. Viewed as key shortfall that would affect resident if were not addressed.
- Requirements to reduce demand must lead to actions and should consider the pathways to reaching net-zero carbon target that WYCA's work showed were the minimum for doing so.
- Needs to be clearly stated whether it has been accepted that there must be reduced road traffic.
- In relation to current road schemes, it queried was whether it would be costly to continue with them and reduce them at a later date and if so, it should be clearly stated and the implications explored.
- Considered that council's approach to schemes in the pipeline or legacy must re-examined to determine whether it allows the Council's net zero policies to be fully implemented.

- Suggested the current road schemes to increase capacity would increase traffic and make it more difficult reach net-zero carbon by 2038.

6. Traffic hierarchy and provision of car-free developments:

- Suggested that the hierarchy of traffic in developments should be embedded within planning polices rather than the introduction and given appropriate weight to counter the assumption of more car traffic from each development.
- If current law or regulation did not allow the Plan to do so, it should be made clear to readers the nature of any changes in law and regulations were required to bring this about.
- Considered that development should be car/traffic free by assumption with penalties for developers that did not offer this.
- Development should not contribute to increased car traffic as implied by the hierarchy set out in Policy TR3. Queried how it could ensure via planning regulations.
- Queried as to what measures could be used to ensure developers offer no parking or off-site parking.
- All site allocations must be considered as having to be car/traffic free.

7. Demand reduction:

- Demand principles within policy were viewed as crucial and should be rigorously implemented.
- Whilst many of the policy principles were welcomed, it was suggested part of the supporting text was clearly in explain the overall policy approach and should be included within the policy itself.

8. Enabling cycling provision and reducing car use:

- Approach prioritising projects that enable cycling and the intention to reduce car dominance was welcomed.
- Considered correct to require developers to demonstrate how cycling would be prioritised from the outset in their proposals.
- Concern that the policy did not reflect the approach as it only “encourages” measures to address this. Instead, it should explicitly state that cycling would be prioritised over vehicles.
- Should be disincentives to driving, such as closing options for cars, rather than just providing cycling corridors if it is to be prioritised.
- Additional provision should be made for those who do not a car and for whom cycling infrastructure and support was not within their grasp.

9. Public Transport

- Considered that areas outside of Bradford District were moving ahead in relation to transport.
- The Leeds to Ilkley railway line was viewed as being oversubscribed, whilst bus services and connectivity were poor.

10. Links between housing, employment, transport and infrastructure:

- Considered to be a disconnect between housing, employment and transport due to previous policy of development first and infrastructure provided later, or not at all.
- Highlighted that parts of District, in particular the valleys such as the Wharfe Valley were restricted in the quantity of servicing and infrastructure routes available, most of which had already been taken up and were creaking.
- House prices were viewed as being too high for industry to attract employees to those areas.
- Suggested that employment routes/pathways should begin at school.
- Including Burley in Wharfedale as a Local Growth Centre was felt to be a near impossibility for a range of reasons.

11. Additional provision for cycling:

- Policy approaches were supported; however, the policy wording should be strengthened to support low carbon travel,
- Greater reference should be made to, or detail included from the Bradford Cycling & Walking Infrastructure Plan and the Bradford Cycling Strategy. Should make the district a place where cycling is naturally part of everyday living.
- Plan should contain more detail on how cycling is to be prioritised and how driving will be disincentivised.
- Policy should provide for secure facilities/areas for bike storage, including within all new housing developments and as part of individual properties.
- Should be a comprehensive network of cycle-friendly streets and provision made for multi-use paths and cycle routes in urban and rural areas. These should be well lit and well maintained so that all sections of society can use them.

12. Additional provision for pedestrians:

- Policy approaches were supported; however, the policy wording should be strengthened to support low carbon travel,
- Greater reference should be made to, or detail included from the Bradford Cycling & Walking Infrastructure Plan and the Bradford Cycling Strategy.
- Requested that additional provision be made in the policy for pedestrians via a range of actions.
- Should provide for direct, well-maintained, and well-lit walking routes, including to and from schools.
- Should provide for quality footways in towns and cities and Quiet Lanes in rural areas.
- Should provide for slowing down traffic with 20mph zones and Home Zones.
- Should provide for improving walking-related infrastructure.
- Should provide for prioritising pedestrians at well-used road crossing points.
- Should provide for walking infrastructure that meet the needs of different groups including older people, disabled people, and children.
- Suggested that short pedestrian journeys could be made easier and safer by using the guiding principles associated with School Streets and Low Traffic Neighbourhoods, which links into the 15-minute neighbourhood concept**.**

13. Proposed development in South East Bradford:

- Objection to Green Belt development in South East Bradford in particular the Tong area.
- Majority of people disagree with plans for housing and a new road in the area.
- Development would affect a Grade II Listed Building.
- Council does not care about the environment and animals that need it.

Support:

1. General Support:

- Policy was generally support subject to a number of qualifications.
- There was support for sustainable, safe and healthy travel and transport. This reflected the shared priorities of communities in the Bingley Rural ward.
- There was support, however it was suggested that the policy did not have any understanding of how people live.
- Proposals were considered to be good with less carbon use and addressing global warming.

2. Ride-sharing/e-bikes:

- Policy was considered to be positive and exciting.
- Encouraging ridesharing sounded good in principle, but come with safety issue, particularly affecting female users.
- Topography means that cycling was a non-starter, irrespective of the level of provision made, unless e-bike stabling and subsidy of e-bike hire/purchase was actively promoted.

3. Impact on the highway network in Ben Rhydding (Ilkley):

- Considered that the railway underpass and the iron bridge over the River Wharfe in Ben Rhydding would need to be widened from one to two lanes to support additional traffic from the proposed developments in the area.

4. Location of development:

- Policy was supported, although several issues needed to be addressed. Noted that it included a desire to reduce car use and maximise efficient use of land.
- Considered that plans to develop on Green Belt land would be likely to increase private car use.
- The provision of out-of-town retail development should be discouraged, with a preference for smaller local businesses.

5. Definition of sustainable vehicles:

- The use of the term “sustainable vehicles” was considered a misnomer as they would still be consumable products and need resources to build, maintain and dispose of them.

6. Public transport provision:

- Considered that greater public transport connections were needed in rural areas., whilst more information was required as how it was intended to promote/expand the use of shared public transport.
- Plan should address the lack of transport links from the centre of Baildon, where the only direct route is to Bradford. Should be bus/rail links to Bingley, Eldwick, Keighley, Skipton, Otley and Guiseley. If not reliance on private cars or taxis would occur.
- Considered that efficient public transport services needed to be in place before development.
- Suggested the better, more frequent bus services that connected with rail service would be helpful for commuters. Despite increased homeworking, there would still be a need to commute to Bradford, Leeds or further afield in future.

7. Provision of EV charging points:

- Policy was supported, but there was a need to ensure that sufficient EV charging points are available in the area, due to increasing demand/need.
- Suggested that policy should be stronger with regarding to EV charging points with a requirement for them in all developments.

8. Address topographic challenges:

- Policy was supported; however, it needed to take account of different topographical challenges in the area.
- Existing terrain did not often allow for the provision of short routes. Means that the location of some developments would necessitate car journeys, despite wishing to use other methods.

9. Improving opportunities for walking and cycling:

- Emphasis on sustainable transport and healthy streets was supported.
- Suggested that existing infrastructure be improved for walking (removing narrow stiles/steps) and cycling (e.g. improved surfacing and lighting). Queried whether a forum could be established to look at such improvements**.**
- Considered that there should be greater ambition.
- Exiting roads were felt to be dangerous for cyclists.

10. Location of development in Addingham:

- Policy approach of ensuring development was located in sustainable places, with access to a range of sustainable transports was supported.
- Proposed approach to allocating sites on the western edge of Addingham was contrary to this policy. Sites were not close to services or facilities, whilst the bus service did not offer a viable alternative to the car.

11. Improvements to the policy:

- Policy was supported but could be strengthened in several ways.

- It should aspire to follow good practice in development 20-minute neighbourhoods.
- Reference should be made to “sustainable and safe streets” to take account of evidence that road safety issues were a factor inhibiting active travel.
- Should emphasise the need to better integrate rail, bus, community transport and active travel. Integration between mode was viewed as being poor, making journeys longer, inconvenient, unpleasant, unsafe and/or impossible.
- Should incorporate reference to making green spaces, cultural sites and attractions accessible via inclusive and sustainable means for everyone in Bradford, together with visitors.

12. Clarification of role in supporting rail and mass transit and the wider strategy:

- Many aspects of the policy were supported.
- However, it was considered unclear as to the Plan’s role in supporting the listed rail and mass transit improvements, and conversely the extent that the locational sustainability of the strategy was contingent on measures that may or may not come forward in the plan period.
- Suggested that given the need to achieve net zero carbon by the end of the plan period, any measures to reduce carbon must be able to take effect during that time.
- If not, they were viewed as legitimate measures for ensuring development post 2038 would be zero carbon, however development before 2038 must then measurably contribute to zero carbon in their absence. Clarification was sought.

13. Sustainable transport principles and demand reduction:

- The four principles of sustainable transport set out in Part C was viewed as important and fully supported.
- Was encouraging to see a policy taking a robust and ambitious approach to demand reduction via the location of development and transforming travel choices/patterns by road space reallocation and re-engineer of streets.
- Suggested the supporting text was clearer than the policy wording regarding what the plan aims to achieve and how it would implement it. As such, some components of it should be included in the policy.

14. Improved rail connections:

- Suggested that should the proposed Manchester to Leeds via Bradford line proved to be too expensive, an alternative fast line between Bradford and Manchester via Huddersfield, connected to the upgraded/electrified Leeds – Manchester route be provided.
- Would need a 4-mile connection (3 of which would be in a tunnel) from Low Moor to Bradley (near Huddersfield).
- Would reduce journey times to Huddersfield and Manchester, whilst a further connection (at Bradley) would provide opportunities for new services to Sheffield.

15. Impact on the strategic road network:

- Policy aspirations were supported as they sought to reduce the demand for travel via a range of measures/mechanisms.

- Would reduce the number of single-occupancy car journeys, which in turn would reduce the impact of the Plan on the Strategic Road Network (SRN).

16. Supporting and developing a cycle network:

- Policy should demonstrate a positive strategy for developing a cycle network across the district, backed by an investment and delivery programme.
- Opportunities have not been taken to connect housing schemes to cycle routes.
- Should be greater recognition of the importance of the National Cycle Network.

17. Making use of efficiency/consolidation measures and technology changes:

- Policy was supported, but it did not maximise the potential that the district could harvest from opportunities for efficiency/consolidation measures and changes to technologies.
- Considered that there would not be sufficient power supply to sustain a complete change to electric vehicles.
- Noted that logistics models focussed on larger of economies of scale, whilst vehicles (buses, refuse lorries, delivery vehicles) were higher polluters due to the nature of their operation and older engines.
- Suggested that local storage provision could be explored to minimise travel distances and time incurred by employees in the transport and services sector.
- Suggested that consideration be given to exploring alternative fuels such as hydrogen and the infrastructure to support it.

18. Managing demand, technological change and improvements to public transport and active travel networks.:

- Principle for reducing demand through locating development in accessible and sustainable locations, maximising densities and co-locating residential and employment uses was supported.
- The use of technological changes to transport was supported in terms of improving connectivity and economic opportunities for businesses in the district.
- Improvements to public transport and active travel networks were also welcomed, although reservations were expressed regarding the introduction of the Clean Air Zone in the City Centre due economic impacts on businesses.

19. Provision of Northern Powerhouse Rail (NPR) and Mass Transit:

- The need for a city centre NPR station and a Mass Transit system was supported.

20. Great Northern Railway Trail:

- Trail highlighted as being protected in previous Local Plans and benefitting from planning permission. Continued protection of the route was supported.

Comments

1. Access to public transport: • Highlighted that use of public transport was dependent on the ability to access it from home and at a reasonable price. • Noted that in areas of Keighley, a car is required to access the town centre. • Suggested more bus subsidies and cross-ticketing were needed.
2. Location of development: • Policy should cross reference the spatial strategy and settlement hierarchy policies in terms of locating development as per the settlement hierarchy to reduce car travel dependency. • Would mean locating the majority of development towards the Regional City, Principal Towns and Local Growth Centres such as Queensbury.
3. Meeting the needs of equestrians: • Needs of equestrians should be considered within this policy and all transport policies within the Local Plan • Should be considered as vulnerable road users and included within the Active Travel Strategy as well as in any shared-use routes. • Greater engagement/consultation should take place at early stages of major housing and infrastructure developments.
3. Supporting the delivery of the Strategic Economic Plan (SEP): • Noted that the plan's policies, including those relating to the delivery of strategic transport investment, were consistent with the SEP. • References to Northern Powerhouse Rail and Mass Transit were welcomed as being in line the City Region Statement of Common Ground. • Both projects considered to have potential to meet demands of growing capacity and increased connectivity and would act as catalysts for regeneration. • Policy hooks relating to the West Yorkshire Transport Strategy and draft West Yorkshire Connectivity Infrastructure Plan were also welcomed.
4. Great Northern Railway Trail: • Highlighted that the GNRT Development Group had worked over a long period to promoted and safeguard the link between Cullingworth and Queensbury using the former GNR railway line. • Vision for the trail has expanded to link Bradford, Halifax and Keighley, including the Queensbury Tunnel. • Group highlighted as working with other campaigns to save Queensbury Tunnel from being filled in as its former part of the vision to use it as part of a cycling and walking route.
5. Encouraging bus usage and active travel:

• District should have a strong pro-bus policy including good bus priority and demand management measures. • Considered to be only way to reduce congestion and pollution. • Will also facilitate active travel. Walking and cycling viewed as being unattractive unless car users from whom it is not suitable switch to the bus. • Proposals for Manningham Lane and Canal Road were not considered to be pro-bus and not fit for purpose.
6. Investment in cycle use in Baildon: • Noted that increase use of cycles was a must and a key Government policy. • Considered that investment in cycle lanes/tracks along West Lane (Baildon) and through Baildon to Saltaire and Shipley would pay dividends in the longer term. • Roads are currently congested, meaning cyclists do not feel safe using them, whilst children are not allowed to cycle to school due to dangers. • Greater thought should be put into creative ways to reduce car use and increase cycle opportunities.
7. Investment in public transport in Baildon: • Public transport must be part of environmentally friendly Local Plan, with investment in bus and rail service being critical to meeting carbon emissions targets. • Suggested that bus services along West Lane (Baildon) should be increase to 3 per hour (peak) reducing to 2 per hour (off-peak) to access Baildon railway station and Shipley. • Rail services from Baildon should increase to 3 per hour at peak times.
8. Support for sustainable transport: • Considered encouraging to see the supporting public transport and low carbon sustainable forms of transport (cycling/walking) were central to the Plan.
9. Cross-boundary Working • Requested that greater reference to cross-boundary working, in particular with the Kirklees Council area, be included within policies. This would include those relating to the highway network and mass transit.

Representation IDs: 1047, 1074, 1878, 1909, 2504, 2506, 2747, 3138, 3245, 3247, 3675, 3795, 3929, 4157, 4163, 4436, 4497, 5175, 5452, 5494, 5597, 5828, 5865, 5918, 5978, 9800, 10950, 11396, 12152, 15404, 15814, 16720, 17288, 17304, 18169, 19773, 19809, 21612, 21801, 21884, 21913, 21942, 21971, 22000, 22029, 22061, 22090, 22119, 22148, 22188, 22217, 22246, 22275, 22304, 22333, 22362, 22473, 22502, 22531, 22560, 22598, 22627, 22656, 22685, 22714, 22743, 22787, 22816, 22854, 22883, 22912, 22941, 22970, 22999, 23028, 23057, 23113,

23142, 23171, 23200, 23229, 23258, 23287, 23316, 23345, 23374, 23403, 23432, 23607, 24119, 24163, 24202, 24315, 24344, 24373, 24402, 24433, 24462, 24547, 24576, 24625, 24700, 24738, 24767, 24845, 24932, 24961, 24990, 25020, 25050, 25084, 25111, 25135, 25189, 25218, 25248, 25430, 25479, 25708, 25737, 25766, 25795, 25824, 25853, 25882, 25911, 25940, 25969, 25998, 26027, 26056, 26085, 26114, 26143, 26172, 26201, 26230, 26259, 26289, 26324, 26353, 26566, 26681, 26713, 26756, 26799, 26828, 26857, 26886, 26915, 26946, 26975, 27007, 27036, 27065, 27118, 27147, 27176, 27205, 27234, 27266, 27295, 27324, 27353, 27382, 27411, 27440, 27562, 27687, 27721, 27794, 27825, 27889, 28188, 28278, 28385, 28583, 28719, 29016, 29129, 29211, 29564, 29604, 29634, 30003, 30084, 30167, 30287

2.11 POLICY SP8: HOUSING GROWTH

Overview

11.1 Policy SP8 sets out the overarching framework for the Council's approach to delivering housing growth over the plan period. Overall, it seeks to ensure that the district's housing needs are met as far as possible and in a sustainable way that protects important environmental assets and minimises any adverse impacts. It provides a strategic framework for ensuring sustainable housing growth in the district over the plan period.

11.2 In total, **387** representations from **301** respondents were submitted in relation to the contents of Policy SP8. There were received from local residents, Town/Parish Councils, agents/planning consultants, developers, landowners, a climate action group, a local charity, a resident's group, local/sub-regional environmental organisations/groups, elected members, Government agencies/bodies (Environment Agency, Highways England), a sub-regional body (West Yorkshire Combined Authority), civic societies, a development industry representative, a Member of Parliament and a neighbouring local authority.

11.3 Due to the extensive nature of Policy SP8, the representations received were broken down and attributed to the relevant parts of the policy. Based on this the issues raised in relation to each element have been summarised separately.

Table 2.11.1: Question 9 - Policy SP8: Housing Growth - Overview Representations Received

Consultation Question 9 - Policy SP8: Housing Growth				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
387	**301**	**349**	**19**	**19**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: **Policy SP8: Housing Growth – Parts A and B - The Housing Requirement** • Proposed housing requirement is too low. • Proposed housing requirement is too high. • Proposed windfall allowance • Alternative Wording Suggestions / Improvements to the Policy	The Council has reviewed the multiple representations made on this policy and these have been considered in the justification and drafting of revised Policy SS2: Growth Requirements in Section 3 of the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments, and changes to national policy / guidance.

• General support for policy **Policy SP8: Housing Growth – Part C - Supporting Additional Growth Opportunities** • Object to Part C • Support comment on Part C • Policy SP8: Housing Growth – Part D - Components of Supply • Broad locations for growth • Paragraph 3.8.23 – discounting • Housing Trajectory • Green Belt • General comments **Policy SP8: Housing Growth – Parts E, F and schedule 1 - Spatial Distribution of Growth** • The Regional City of Bradford • Airedale • Wharfedale • South Pennine Towns and Villages • Alternative Wording Suggestions/Improvements to the Policy **Policy SP8: Housing Growth – Parts G to M Supporting Sustainable Growth** • Part I – Affordable housing • General support • Part I- Affordable housing • Part K- Modern Method of Construction • Part L - Supporting Delivery	

Policy SP8: Housing Growth – Parts A and B - The Housing Requirement
Summary of Representations
Objections:
1. General Comments • Housing growth should be based on principles such as urban capacity, participative processes and zero carbon design and sustainable locations • It is unclear on what basis future housing needs have been calculated, by whom and on what assumptions - Housing growth should be based on demographic need and not exceed this • There is insufficient evidence to back up the Plan's policies which therefore lack credibility • No decisions should be made until after the 2021 census data is issued and reviewed and until the effects of the pandemic is known • Vacant unoccupied housing should be deducted from the targets • The housing requirement of the district and the settlements should be seen as a minimum. • No explanation given for how future housing needs have been calculated
2. Proposed housing requirement is too low: • Council has deviated from Government's Standard Methodology by not including 35% Urban Uplift. • 35% Urban Uplift cannot be excluded, discounted or removed – it must form one of the defined stages of the Standard Methodology. It is not an optional variable. • Council's Housing Need Addendum (2021) is incorrect and inconsistent in addressing the minimum level of need. This should be 2,300 homes per annum not 1,704. • The draft Local Plan is over 10,000 dwellings short compared to identified need. • The draft Plan offers very little explanation, and no evidence, on why the 35% uplift is not deliverable or justified. • There are suitable additional suitable sites (several references to different sites by different respondents) which could be allocated to meet this additional growth. The identification of 'strategic constraints (Green Belt)' as a reason not to apply the uplift is unacceptable. • It is unclear how only four years ago the Council were confident they could deliver 42,100 new homes over a 17-year period – nothing has changed.

- The housing strategy is not ambitious enough and does not align with the ambitions of the Leeds City Region Growth Strategy and Northern Powerhouse
- The scale of need for affordable housing justifies an uplift to the overall housing requirement figure.
- 2,295 dwellings per annum should be the minimum as required by NPPG and the council should consider an uplift to this figure. The 35% uplift should apply to the edge of the urban areas and include the edge of Keighley.

3. Proposed housing requirement is too high.

- The need for the level of housing growth proposed has not been demonstrated and would be environmentally damaging
- None of the SHMA and demographic evidence reports justify a requirement of 1,704 dwellings per annum
- With population in the industrialised developed world projected to decline over the next 30-60 years the proposed 1704 houses per annum would exceed demographic housing need
- The plan should wait until the results of the 2021 census is known
- Static or declining employment means that there is less need for housing
- The council should adopt the reasonable alternative which reduces the housing requirement and reduces the release of green belt sites;

4. Proposed windfall allowance:

- Insufficient evidence provided to justify the proposed windfall allowance.
- There are enough empty homes in city to accommodate what is needed, taking account of those left derelict and empty apartment buildings closed for being unsafe.
- In Ilkley, approximately 25 dwellings per year are generated from windfall sites. These are the result of, using gardens, domestic demolition and re development. With the post-Covid changes to the High Street expected to have some impact another series of dwellings may be achieved via permitted development rights. These should all be taken into account.
- The plan should have taken into account, sites that may become available in due course such as Ilkley sewage works.
- Paragraph 3.8.27 states that based on historic windfall delivery rates and future trends the Council considers that it is reasonable to make a modest, assumed contribution of 300 units. 300 dwellings per annum equates to 16% of the annual requirement and therefore is a significant proportion of the expected supply. No evidence is provided as to what the historic windfall rates have been or what evidence there is to support a continuation of these rates.

5. Alternative Wording Suggestions / Improvements to the Policy

- Policy SP8 is too long and should be split into a number of separate shorter policies.
- The housing requirement calculation should be clear and transparent and provided in the supporting text.

- The statement in Part A referring to ‘a significant boost in housing delivery’ should be deleted.
- • Substitute the working “housing” with “accommodation”

Support:

- 1703 homes pa are sufficient to meet the districts need but based on household projections which are expected to be lower in the future. Following Brexit- expectation that migration will reduce and fewer homes then needed. The government’s 35% urban uplift is unreasonable and will result in more green belt loss.
- Agree for Bradford not to accept the 35% uplift as this would likely result in further peripheral green belt sites

Comments:

No comments

Policy SP8: Housing Growth – Part C - Supporting Additional Growth Opportunities

Summary of Representations

Objections:

- Part C of the policy should be amended to provide clear guidance policy on what additional growth opportunities are supported

Support:

- Part C provides for additional opportunities as they arise including taking a flexible approach to additional growth activities which deliver transformational change

Comments:

No comments

Policy SP8: Housing Growth – Part D - Components of Supply
Summary of Representations
Objections:
1. Broad locations for growth • The components of supply identified seem to describe a sequential approach with 2 broad locations for growth. We infer from this that land for the broad locations would be removed from the Green Belt but not allocated. It is also unclear whether those broad locations for growth are intended to supply further housing numbers beyond the plan period. It is of great concern that we cannot see from the draft Plan what the extent of land-take in the broad locations for growth within and beyond the plan period is likely to be. • It is also unclear whether those broad locations for growth are intended to supply further housing numbers beyond the plan period. • It is of great concern that we cannot see from the draft Plan what the extent of land-take in the broad locations for growth within and beyond the plan period is likely to be
2. Paragraph 3.8.23 – discounting • The 10% discount on committed sites for Thornton is an under estimate and should be increased to 20% as many are long standing commitments subject to constraints. The contribution from commitments should be reduced from 43 to 35 units. • The policy and text should be clearer/more transparent providing a summary of the requirement, supply and allocations required. The supporting text and the technical note explain that a 10% discount is applied to the sources of supply. Neither the policy itself nor supporting text provide a summary of the supply figures. Indeed, the figure for actual housing allocations are not provided until later in the plan under the individual settlement sections. For the reader the policy does not provide sufficient clear information on existing supply and the amount of dwellings required through new allocations.
3. Housing Trajectory • Concern raised that the housing trajectory (setting out the projected housing delivery) suggests there will be limited development in years 1 to 5, followed by an “explosion” of delivery in Year 6. Development should be more graded. • Scepticism is applied to the trajectory and the suggestion that the Plan should be more aspirational in the range of sites and number of outlets to deliver the housing requirement from adoption, not five years hence
4. Green Belt • Objections to the proportion of the housing requirement which will be required from the Green Belt to meet the objectively assessed needs of the district
Support:
No representations received in support.
Comments:

- The removal of outline permissions from the commitments source of supply is in accordance with the NPPF and is welcomed.
- Housing from windfall sites and development that takes place before the Plan is adopted should be removed from the total number of houses required in the Ilkley settlement.

- Many other housing units have been and are likely to continue to be built by garden division sites and demolition of existing houses which have been replaced by several new units. In Ilkley approximately 25 dwellings per year are generated from windfall sites.
- SLA identifies supply of 33,466 units – potential shortfall of 12,400 units against the LHN.

- Projected housing delivery set out in the housing trajectory suggests that the mix of sites will not meet Local Housing Need in years 1-5 but then be followed by an explosion in year 6. It would be more believable if changes in supply were more graded. The Plan should be more aspirational in the range of sites which need to deliver from plan adoption, not from 5 years into the plan period.

Policy SP8: Housing Growth – Parts E , F and schedule 1 - Spatial Distribution of Growth

Summary of Representations

Objections:

1. **General Comments**

- General objections to the distribution
- Alternative distributions proposed which meet the 35% need uplift as set out in the Government's standard method.
- A lack of logic and consistency between settlements in the same part of the settlement hierarchy.
- No explanation on the change in distribution compared to the Core Strategy
- Distribution has been inappropriately focused on limiting the extent of green belt land releases.
- The plan should measure housing land requirements by land area, rather than by the indicative capacities that are derived from market preference.
- Local Service Centres should see higher numbers. The SLA shows that such an increase could be accommodated.

2. **The Regional City of Bradford**

City Centre

- Increase in the housing target for the City Centre compared to that within the Core Strategy – this target is not deliverable or achievable given the level of social, and economic change needed to facilitate it
- Housing sites within the city centre have been available for many years but have not been implemented
- The covid pandemic has resulted in people's aspirations to live in areas closer to green spaces and countryside not in city centre locations

Bradford South East

- Bradford South Constituency Area will suffer a disproportionate burden of additional housing and green belt loss compared to other settlements/areas
- The Bradford SE target should be increased – it has seen unjustified and disproportionate reductions compared to the Core Strategy. (Areas advocated for more housing include Wyke and the Holme Wood Urban Extension

Bradford North East

- The Bradford NE target is too low - no evidence as to why this area has seen a bigger drop than others

Bradford South West and North West

- The targets for Bradford SW and Bradford NW have been reduced compared to the Core Strategy as a result of the Plan's shift to a focus more on the city centre - these areas are sustainable locations for housing growth and could accommodate higher levels of new housing.

Shipley

- The Shipley target is too high and disproportionate compared to other areas. It is unclear how the housing need figures for Shipley have been derived

3. Airedale

Keighley

- The target proposed for Keighley is too low and has been reduced since the adopted Core Strategy due to an inappropriate Regional City/City Centre focus. The overall district housing need figure should be increased with the Keighley apportionment increased accordingly.
- The proposed target falls significantly below the baseline population proportionate figure.

Bingley

- The target for Bingley is too high- account should be taken of the amount of new homes which have been built in the town in the past 10 years Bingley's and Silsden's targets should be higher and that too much growth was being focused on the city centre.
- The target is too low and should be increased.

Silsden

- Too much growth is focussed on the city centre away from other areas and Silsden's target should be increased.
- The target for Silsden is too high – this will mean loss of green fields and increased traffic and congestion

Cottingley

- Target was too low, though one welcomed the increase when compared to the Core Strategy.
- Cottingley is sustainable and closely located to Bingley but has a lower target than Haworth which was more isolated and less sustainable.

East Morton

- The target is too low.

4. Wharfedale

- The level of growth in Wharfedale is too high, is not needed and will not benefit the area being instead for the benefit of those working in Leeds

Ilkley

- The target in Ilkley is too high - the target will mean the loss of green belt, impact local character, increase traffic and parking
- The target in Ilkley is too low compared to other principal towns. The focus of city centre/regional city growth should not be at the expense of sustainable locations such as Ilkley.

Burley in Wharfedale

- The target is disproportionately high when there is a lack of local services and infrastructure. The focus should be on brownfield sites in Bradford.
- The Burley target is too low when it has good rail service links compared to areas to the east and west of the regional city where growth is proposed. It should be raised to reflect its role as a Local Growth Centre.

Menston

- The target was too low when it has good rail service links compared to areas to the east and west of the regional city where growth is proposed.
- The target is too high- no more new homes should be planned over and above those planned.

Addingham

- The target for Addingham is too high compared to other areas with no justification for the increase in the target compared to other settlements which have seen their targets reduced.
- The target was inappropriate for a Local Service Centre which is not sustainable as the village has few employment opportunities.
- Impact of the target on local character, schools, roads and increased traffic.
- The sites identified to meet the target are not suitable being on the western edge of the village

5. South Pennine Towns and Villages

Baildon

- The target is too low- Sites on the settlement edge could be allocated to provide a higher level of growth
- The target is too high – loss of green belt sites, which could have gone to brownfield sites across the urban area.

Oakworth

- No justification for more homes in addition to those built in previous decades

Wilsden

- The target is too low and the level of growth in the regional city too high.

6. Alternative Wording Suggestions/Improvements to the Policy

- Wording needed to show which of the settlements in Schedule 1 have prepared or are preparing neighbourhood plans.
- In many cases we know that communities are objecting not to the numerical target itself but to specific site allocations. Part F should be worded to empower neighbourhood plans to specify the type and density of housing, such that meeting or exceeding the numerical target but on fewer sites, or on a greater number of smaller sites, is an acceptable role for the neighbourhood plan.

Support:

- Support for increase in target for Cottingley compared to that in the Core Strategy
- Support for the proposals for housing in Ilkley due to the need for more affordable homes and homes for families in the town
- Support for the Wilsden target

- Support for the distribution in the regional city, principal towns and local growth centres as areas which are more sustainable in nature with more transport hubs and increased network coverage.
- Support for urban and city centre growth.
- The commitment to ensuring that a sequential approach is taken to site selection and allocation which is expanded upon in the text for policy SP8.
- Support for Wharfedale targets, but need to ensure that Burley, Ilkley and Addingham be looked at as an integrated community.
- Support for provision of 250 dwellings within the town centre in additional to those allocated which could be achieved through the Town Deal Board
- Support but concern over why the population proportion option has not been used to minimise the impact on Silsden and Burley in Wharfedale where development is most “at odds” to the population size.
- Support for the reduction in housing proposed in Silsden

Comments:

- WYCA are encouraged that the Local Plan provides several policy hooks that dovetail well with the WY Transport Strategy and draft West Yorkshire Connectivity Infrastructure Plan.
- WYCA consider that the Local Plan settlement hierarchy approach, which directs growth in the main centres and along strategic transport corridors, is consistent with other Partner Councils in West Yorkshire and aligns well with programmed and future transport investments particularly schemes identified in the West Yorkshire Transport Fund and Transforming Cities Fund. It also aligns well with the existing public transport network provision that tend to be strongest in the main centres.
- Given the numbers being proposed in other settlements locally, the number of 283 houses allocated for Ilkley does not seem unreasonable.
- Support for the Addingham target. However, that target should not be a ceiling. The target should be amended to reflect the fact that table A identifies sites with a total capacity of 181 dwellings.
- The council should support a greater housing number for the South East of Bradford

Policy SP8: Housing Growth – Parts G to M Supporting Sustainable Growth

Summary of Representations

Objections:

1. **Part I – Affordable housing**

- This section should explicitly refer to the role that Community Led Housing should play in meeting local needs.
- The issue here is not one of affordability but of income and social housing. Affordable social housing needs to be delivered at a very low starting price.
- Why could BDMC not consider an affordable housing initiative as in Manchester? The definition of affordable housing in terms of rent or mortgage needs to be revised downwards as other cities (Manchester) have done.

Support:

- Support for the maximisation of brownfield (PDL) land- PDL inside and outside the green belt should be considered.
- Support for delivering the right infrastructure but this should be done before the houses are built.
- The HBF generally supports the Council in seeking to meet their affordable housing needs. 25% of the housing requirement would be 426dpa. The Strategic Housing Market Assessment (SHMA) (2019) states that the overall net annual imbalance is calculated to be 441 affordable dwellings each year. The PPG states that 'total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. The HBF considers that the Council need to ensure that this affordable housing need is given consideration in determining an appropriate housing requirement.
- Support the policy but is opposed to the practice of developers to provide financial contributions in place of on side affordable housing. Young adults should not have to move from the district in order to be able to purchase a home.
- Community led housing has a role in providing affordable housing that meets local needs and the policy should refer to this

Comments:

1. **Part I- Affordable housing**

- Developers should not be able to provide a contribution but should develop affordable homes on site.
- 25% of the housing requirement (426 dwellings per annum) is expected to be affordable housing, however the SHMA identifies a net annual imbalance of 441 affordable dwellings per year. Consideration needs to be given to total affordable housing need when

determining an appropriate housing requirement. An increase in total housing figures may need to consider where it helps delivery affordable housing. • Whilst there is a need for Affordable Housing, but it should be geared towards local families with legitimate contacts to the area and a formula that gives affordability
2. Part K- Modern Method of Construction • Modern methods of construction, whether using conventional or unconventional materials, should be encouraged where they can prove their effectiveness in reaching zero Carbon. • There should be a concentration on quality and sustainability issues – insulation, heat pumps, solar panels.
3. Part L - Supporting Delivery • Paragraph L of SP8 should also include a commitment to making land available for Community Led Housing initiatives

Representation IDs: 1086, 1716, 1824, 1829, 1879, 1910, 1954, 1957, 2114, 2510, 2624, 2637, 2672, 2750, 2779, 2819, 2887, 2897, 3048, 3115, 3250, 3326, 3386, 3536, 3557, 3676, 3765, 3805, 3941, 4168, 4218, 4226, 4532, 4834, 4878, 5190, 5306, 5402, 5435, 5493, 5511, 5607, 5685, 5921, 5984, 6067, 6325, 6555, 6764, 7531, 7654, 7702, 7857, 8136, 8421, 8555, 8761, 8766, 9801, 10326, 10327, 10952, 10953, 11012, 11402, 12314, 13203, 13321, 13812, 13814, 15212, 15405, 15756, 15775, 15831, 16238, 16264, 16268, 16275, 16341, 16342, 16555, 16721, 16748, 16959, 16987, 17115, 17116, 17121, 17126, 17127, 17131, 17165, 17166, 17172, 17173, 17240, 17422, 17549, 17688, 18163, 18383, 18384, 18385, 18405, 18411, 18743, 18922, 18932, 18942, 18952, 19386, 19454, 19609, 19610, 19774, 19810, 19836, 19942, 19943, 20090, 20318, 20379, 21613, 21642, 21643, 21647, 21648, 21652, 21653, 21657, 21658, 21698, 21699, 21765, 21776, 21802, 21885, 21914, 21943, 21972, 22001, 22030, 22062, 22091, 22120, 22149, 22189, 22218, 22247, 22276, 22305, 22334, 22363, 22474, 22503, 22532, 22561, 22599, 22628, 22657, 22686, 22715, 22744, 22788, 22817, 22855, 22884, 22913, 22942, 22971, 23000, 23029, 23058, 23114, 23143, 23172, 23201, 23230, 23259, 23288, 23317, 23346, 23375, 23404, 23433, 23585, 23586, 23587, 23608, 23637, 23640, 23644, 23645, 23646, 23649, 23650, 23652, 23653, 23655, 23656, 23667, 23668, 24120, 24164, 24203, 24316, 24345, 24374, 24403, 24434, 24463, 24548, 24577, 24604, 24626, 24701, 24739, 24768, 24846, 24884, 24898, 24933, 24962, 24991, 25021, 25051, 25085, 25109, 25116, 25136, 25158, 25159, 25160, 25190, 25219, 25304, 25311, 25431, 25480, 25503, 25709, 25738, 25767, 25796, 25825, 25854, 25883, 25912, 25941, 25970, 25999, 26028, 26057, 26086, 26115, 26144, 26173, 26202, 26231, 26260, 26290, 26325, 26354, 26527, 26567, 26682, 26714, 26757, 26800, 26829, 26858, 26887, 26916, 26947, 26976, 27008, 27037, 27066, 27119, 27148, 27177, 27206, 27235, 27267, 27296, 27325, 27354, 27383, 27412, 27441, 27547, 27548, 27549, 27563, 27642, 27688, 27722, 27795, 27826, 27890, 27960, 28128, 28129, 28189, 28234, 28279, 28432, 28433, 28468, 28469, 28522, 28523, 28525, 28695, 28723, 28724, 28727, 28731, 29010, 29011, 29012, 29015, 29037, 29038, 29176, 29212, 29432, 29434, 29439, 29440, 29545, 29546, 29565, 29605, 29657, 29682, 29683, 29695, 29699, 29706, 29707, 29737, 29769, 29771, 29773, 29793, 29794, 29803, 29812, 29910, 29913, 29933, 29954, 29955, 29982, 30004, 30038, 30054, 30055, 30056, 30057, 30058, 30059, 30060, 30061, 30062, 30067, 30068, 30085, 30106, 30108, 30109, 30110, 30135, 30136, 30138, 30146, 30168, 30206, 30207, 30208, 30209, 30257, 30259, 30288, 30295

2.12 POLICY SP9: CLIMATE CHANGE, ENVIRONMENTAL SUSTAINABILITY AND RESOURCE USE

Overview

Policy SP9 sets out the strategic approach to tackling climate change. It includes a target to achieve net-zero emissions by 2038 in line with the wider Leeds City Region ambition. This will require a substantial change in the way areas are planned and how new development is built. The policy also looks at the requirements to mitigate against the impact of climate change as well as the requirements to include adaptation measures to ensure long-term resilience to the impacts.

In total, **193** representations from **191** respondents were submitted in relation to the contents of Policy SP9. These were received from local residents, Town/Parish Councils, agents/planning consultants, a local charity, a climate action group, a resident's group, a travel group, local/sub-regional environmental organisation, elected members, developers, a wildlife trust, a sub-regional body (West Yorkshire Combined Authority), Government agencies/bodies (Environment Agency, Historic England, Natural England), a development industry representative, landowners, and a neighbouring local authority.

Table 2.12.1: Question 10 - Policy SP9: Climate Change, Environmental Sustainability and Resource Use – Summary of Representations Received

Consultation Question 10 – Policy SP9: Climate Change, Environmental Sustainability and Resource Use				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
193	**191**	**154**	**25**	**14**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Adaption • Air quality • Biodiversity • Carbon modelling • Delivery	The Council has reviewed the multiple representations made on this policy and these have been considered in the justification and drafting of revised Policy ST3: Climate Resilience, Environmental Sustainability & Resource Use in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Green Belt/Site Specifics • Housing • Housing energy/energy efficiency • Open space/SuDS/walking • Reasonable alternatives • Timescales • Targets • Support for air quality • Biodiversity • Renewables • Resource use • Biodiversity • Digital infrastructure • Energy efficiency • General support • Green infrastructure amendments to policy • Guidance • Housing • Resource use	

Summary of Representations
Objections:
1. Adaptation • Policy needs additional wording to ensure developments are being designed to incorporate measures to adapt to climate change. Including the following: - opportunities for both natural heating and ventilation and reducing exposure to wind/other elements. -maximising resistance/resilience by the use of solar shading, thermal mass, heating and ventilation, appropriately coloured materials, green/brown roofs/walls etc. - use of trees and other planting - minimising surface water run-off.

2. Air quality • There should be no place for an incinerator, airport expansion, road widening etc. Reverse the decision on the incinerator. Terrible decision for the environment.
3. Biodiversity • Trees and other planting should form part of a landscape scheme to provide shading and connect habitats. Designed with native plants to meet predicted changed climatic conditions. • Advise a change in wording to point 4 so it reads: "Facilitating the management, restoration, enhancement and expansion, of vulnerable habitat types: primarily blanket bog and woodland, which are important for carbon sequestration; ensuring a net gain in biodiversity (Policy EN2)." • Need to ensure consistency in referencing of biodiversity net gain across policies.
4. Carbon modelling • Developers should have to provide carbon modelling information to demonstrate that their development is carbon-neutral/carbon-negative in terms of emissions from construction, building energy use and travel as a result of the development.
5. Delivery • There should be pre-planning actions so planning applications are already compliant with the climate change policy on submission.
6. Green Belt / Site Specifics • Principles of the policy have not been carried forward into the allocations. Allocating significant numbers of housing in Addingham is not sustainable and will result in increased car journeys and will not help to get to net zero emissions.
7. Housing • All new developments should be carbon neutral as a condition of building. Housing standards needs to insist on net-zero emissions dwellings now. • Agree building design using solar gain, passive house, high levels of insulation are vital. Construction and heating standards need to be very high. • The recommendations set out in the policy should be definite requirements rather than guidance. All new housing required to be zero carbon. Every new development should have access to shops and services by walking and cycling. • No car parking spaces. Developments should be 15-minute neighbourhoods. • Clear that Bradford Council are to adhere to NPPF para 148, rather than be the first to raise the bar. Mandatory requirement of energy efficient carbon-neutral homes has a defined set of outcomes easily measurable against a simple set of KPIs.
8. Housing / Energy Efficiency • There should be mandatory delivery of efficient carbon neutral housing with the Council taking the lead role on this initiative.
9. Open space / SuDS / Walking • Open spaces should not be built on and should remain as soakaways.

- Advise a change in wording to point 3 so it reads: "Incorporating green infrastructure into the scheme from the outset, including such measures as the provision of: areas of green space and green corridors, landscaping, tree planting and retention of existing trees and hedgerows, and nature-based solutions such as green roofs and walls, and SuDS (Policy SP10)."

10. Reasonable alternatives

- The reasonable alternatives seem very much weaker than proposed policy SP9. The proposals should be strengthened by alternatives that specify how the aims will be achieved. How will traffic-free, parking-free developments be ensured? What restrictions/encouragements will be given? And will they be enforceable?

11. Timescales

- Needs to be accelerated

12. Target

- The policy should aim for net zero emissions by 2030 rather than 2038 (and would be in line with the Climate change Committee's 6th carbon budget).

Support:

1. Air quality

- Support for tackling air pollution.

2. Biodiversity

- Target for biodiversity should also be set.
- Policy could be improved by making reference to the greater benefit of allowing shrubs and trees to naturally regenerate (Rewilding Britain).

3. Carbon modelling

- Developers should have to provide information about carbon emissions and mitigation, including predicted emissions from the 'use' of the development.

4. Delivery

- More details on delivery of SP9 required. Insufficient to rely of planning application process alone.
- BMDC must adopt rigorous, robust planning policy and respect recommendations of town and parish councils.
- Policy should explicitly recognise the need to engage and empower communities to enable a swift and inclusive transition to more sustainable behaviours.

5. Green Belt / Site Specifics

- Council should support delivery of highly sustainable Green Belt sites which can deliver environmental enhancements and climate adaptation/mitigation.

- The two large green belt sites in Ilkley do not conform to points B1a, B4, B5, C3, D6 and D7 of this policy.

6. Open space / SuDS / Walking

- Pleased to note the increased emphasis on strategies designed to achieve net zero carbon emissions through greener lifestyles, and recognising the value of green infrastructure and open spaces.

7. Renewables

- Stronger support required for renewables.

8. Resource Use

- Support for policies for sustainable growth which prioritises the use of brownfield sites and regeneration of key areas.

9. Target

- Vital that specific target is mentioned. Policy should include a commitment to measuring, explaining and publicising progress annually.
- Costs will dictate the delivery. Make a challenging target and keep to it. (e.g. why were solar panels not included on Burley Oaks School when it was renovated?)
- Support for the policies which aim to achieve the target of net zero carbon emissions by 2038 and a clean air zone.
- Welcome the inclusion of the high-level target of net-zero 2038 within the policy.

Comments

1. Biodiversity

- Developers should apply the Building with Nature standards. The application of this tool should be included in the policy. It would help to delivery multi-functional green infrastructure, creating places where nature can flourish.

2. Digital infrastructure

- Policy could be enhanced by referencing the role of digital infrastructure/technology - for instance by reducing the need to travel or supporting smart monitoring of energy use.

3. Energy efficiency

- The Government wants to create certainty and consistency. An uplift in Part L of the building regulations will improve the energy efficiency of new homes and prepare house builders and supply chains for the further uplift in 2025 to meet the Future Homes Standard.

4. General support

- General support for the policy
- Supportive of action on addressing climate emergency and strengthening local resilience

5. Green Infrastructure

- Amend B5 to read: “Development proposals should mitigate their potential impacts on climate change by… …incorporating green and blue infrastructure provision and improvements”.
- Amend C3 to read: “Development proposals should help to adapt to the impacts of climate change and build in long-term resilience through innovation and by… … incorporating green and blue infrastructure into the scheme from the outset, including such measures as the protection, enhancement, or provision of: areas of green space and green and blue corridors, landscaping, tree planting and retention of existing trees, green roofs and walls, and SuDS (Policy SP10)”.
- Amend C4 to read: “Development proposals should help to adapt to the impacts of climate change and build in long-term resilience through innovation and by… …facilitating the management, enhancement and expansion, of vulnerable habitat types: primarily blanket bog and woodland and rivers, which are important for carbon sequestration; and ensuring a net gain in biodiversity (Policy EN2)”.

6. Guidance

- Attention is drawn to the ADEPT guidance on Preparing for a Changing Climate: Good Practice Guidance for Local Government.

7. Housing

- New developments should perform an environmental impact assessment on neighbouring homes so as not to hinder future aspirations e.g. by potentially block natural light to solar heating panels.

8. Open space / SuDS / Walking

- SUDS should be an essential item in any planning application. Essential to get drainage right.
- Dubious that measures outlined in SP9C1 are effective except in areas of low flood risk. They don't deal with vastly increased flood risk pursuant to large scale housing development and the introduction of non-permeable surfacing on a large scale.
- Further consideration should be given to making properties more resilient to flooding when it occurs.
- Support the inclusion of SP9 C1 reference to SuDS, water efficiency and NFM but the policy should be developed to encourage SuDS, drainage connections, habitat creation, water efficiency, naturalisation of water bodies etc.
- SP9 B4 should emphasise that development should be located in areas of low flood risk both in the present sense and future risk sense. The layout of developments should follow a sequential approach to avoid the area’s most at flood risk.
- Recommend SP9 B1 is amended to take account of the need for increased development densities to reduce road traffic and increase use of walking and cycling.

9. Resource Use

- Aspiration of Ilkley Town Council to protect local Green Belt, biodiversity and local infrastructure whilst acknowledging the need for affordable, well-designed, energy efficient zero carbon adaptable and accessible housing is not always translated into the detail of the Local Plan - especially with regard to sustainability and site allocations.

10. Target

- This policy is setting a target ahead of the Government target of net zero carbon by 2050. The key to success is standardisation and avoidance of every council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for product manufacturers, suppliers and developers.
  Encouragement for the need to minimise carbon emissions is supported along with the move towards greater energy efficiency via nationally consistent set of standards.
  The Local Authority needs to set local carbon targets based on an assessment of local potential and taking into account national and international targets. Planning policies need to be developed that are consistent with these targets and include a monitoring mechanism.
- The SEA directive includes a duty for a plan's cumulative climate impact to be assessed and taken into account. This includes assessing the consistency of policies with all relevant climate objectives and targets.
- Support for the ambition to achieve net zero by 2038.
- Support for the strengthening of commitment to higher environmental standards including a net zero target for 2038. It is not backed up with an appropriate economic plan to reduce journeys to work or avoiding wasteful use of greenfield sites.
- Recommend SP9 A3 is amended to make clear that achieving the headline target is dependent on all developments making a net contribution to carbon emissions reductions.

Representation IDs: 291, 1911, 1958, 2513, 2751, 3168, 3466, 3560, 3600, 3677, 3758, 3807, 3909, 3949, 4171, 4517, 4676, 4932, 5041, 5055, 5329, 5468, 5600, 5854, 5924, 5985, 9802, 10954, 11403, 11543, 13885, 15771, 15821, 16722, 19775, 19811, 19837, 21614, 21803, 21886, 21915, 21944, 21973, 22002, 22031, 22063, 22092, 22121, 22150, 22190, 22219, 22248, 22277, 22306, 22335, 22364, 22475, 22504, 22533, 22562, 22600, 22629, 22658, 22687, 22716, 22745, 22789, 22818, 22856, 22885, 22914, 22943, 22972, 23001, 23030, 23059, 23115, 23144, 23173, 23202, 23231, 23260, 23289, 23318, 23347, 23376, 23405, 23434, 23609, 24121, 24165, 24204, 24317, 24346, 24375, 24404, 24435, 24464, 24549, 24578, 24627, 24702, 24740, 24769, 24847, 24934, 24963, 24992, 25022, 25052, 25086, 25137, 25161, 25191, 25220, 25432, 25481, 25710, 25739, 25768, 25797, 25826, 25855, 25884, 25913, 25942, 25971, 26000, 26029, 26058, 26087, 26116, 26145, 26174, 26203, 26232, 26261, 26291, 26326, 26355, 26568, 26683, 26715, 26758, 26801, 26830, 26859, 26888, 26917, 26948, 26977, 27009, 27038, 27067, 27120, 27149, 27178, 27207, 27236, 27268, 27297, 27326, 27355, 27384, 27413, 27442, 27564, 27643, 27689, 27723, 27777, 27796, 27827, 27891, 27930, 28190, 28280, 29017, 29057, 29086, 29128, 29178, 29213, 29566, 29606, 29678, 29735, 29767, 29807, 30005, 30086, 30169, 30289

2.13 POLICY SP10: GREEN INFRASTRUCTURE

Overview

Policy SP10 sets out the strategic approach to protecting the District's Green Infrastructure network and the requirements for the provision of Green Infrastructure in new developments. The requirements of the policy reflect the value that GI can add to the quality of the district for residents, visitors and businesses, the need to adapt to climate change and the importance of existing environmental assets, particularly the district's rural hinterland. Identifying GI assets can improve and protect essential natural capital, including soils, air quality and critical water resources.

In total, **181** representations from **179** respondents were submitted in relation to the contents of Policy SP10. These were received from local residents, Town/Parish Councils, agents/planning consultants, a local charity, climate action groups, a local access group, a cycling campaign group, a sub-regional environmental organisation, elected members, developers, a wildlife trust, a waterways body (Canal and River Trust), a footpath development group (Great Northern Railway Trail Development Group), a Government agencies/bodies (Environment Agency, Historic England, Natural England), landowners, a national heritage organisation (The National Trust) and a neighbouring local authority.

Table 2.13.1: Question 11 - Policy SP10: Green Infrastructure - Summary of Representations Received

Consultation Question 11 – Policy SP10: Green Infrastructure

Number of Representations	Number of Respondents	Object	Support	Comment
181	**179**	**146**	**25**	**10**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Biodiversity • Delivery • Mapping • Strategy • Open space • GI Standards	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy ST6: Strategic Green and Blue Infrastructure Network in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Support for additional green infrastructure • Biodiversity • Delivery and monitoring • Engagement • General support	

Summary of Representations
Objections:
1. Biodiversity: • A consistent approach to the references to biodiversity net gain in a number of policies should be made.
2. Delivery: • The detail presented here should not be aspirational but should identify and deliver green infrastructure as mandatory.
3. Mapping: • The plan provided at Appendix 14 is too vague and the policy is unclear on what is to be protected/enhanced.
4. Strategy: • Support the strategic approach set out within the policy to protecting the existing green and blue infrastructure and expanding the network. • The map provided at Appendix 14 should be complemented by a GI Strategy to underpin the strategic approach.
5. Open space: • The policy states all designated areas of open space will be protected- including privately owned sporting venues. The Council has no evidence to justify the specific protection of privately owned golf clubs. Sport England do not seek to protect golf courses. • Object to Queensbury Golf Course being designated as public open space.
6. Standards: • The proposed GI standards (from NE once published) should be included in Policy SP10 rather than EN1 to strengthen and give prominence to the strategic importance of GI. The plan could also include an objective to use the new standards to assess GI across the District.

Support:	
Additional Green Infrastructure: • Support for policy which protects and enhances biodiversity. Green bridges and tunnels should be added into the policy to reduce roadkill and allow safe movement. Living roofs and walls could be added to new and existing buildings. • Other Green/Blue Infrastructure have not been recognised such as re-opening culverted watercourses; prevent development in floodplain; removing existing development from flood plain; providing greenspaces alongside watercourses; insisting on minimum provision of GBI in new developments. • Biodiversity crisis requires a bolder approach. All verges should be wildflower meadows; 30% of council owned open space should be wild; Wild Belts or derelict areas in the city should be rewilded; public should be educated about why wild areas are necessary. Energy infrastructure should be compatible with conversion to micro grids. All building to have habitats for wildlife e.g. swift bricks, flat roofs to have living plants - reducing water run-off and providing habitats for insects, nectar for bees. Flood risks need to be emphasised further.	
1. Biodiversity: • Emphasis is on human health. A target for biodiversity is also needed.	
2. Delivery and Monitoring: • Further information on the delivery of this policy is required - insufficient to rely on the planning application process alone. • The policy should not just be mere aspirations. It needs to be a requirement and implemented. • Further funding is required to support the delivery of this policy. • Policy is good but is undermined in practice. Example: the green corridor from Bolton Road to junction with Shipley Airedale Road to Peel Park has seen the disappearance of wildlife since the loss of the meadow on the NW side of Bolton Road in 2012. The policy should include a requirement for an annual audit of biodiversity in the Bradford District (ward by ward) so it can be seen which species are becoming extinct due to planning decisions.	
3. Engagement: • Policy should be expanded to positively encourage joint working with landowners/developers to enable enhancement/ expansion of green infrastructure networks.	

4. General Support:

- General support for the preferred option policy.
- Support for the protection, maintenance and enhancement of the strategic GI network. Support for the land at and around East Riddlesden Hall being included as part of the network. Also support for development proposals to make a positive contribution to the provision of GI.
- Support for the policy in relation to the role Green and Blue Infrastructure plays in conserving and enhancing the historic environment. Several elements of the GI network in Bradford are designated heritage assets in their own right or contribute to the setting of historic buildings and structures. Welcome the identification of landscapes and cultural heritage as features of the network and the links provided to relevant policies dealing with the conservation and enhancement of the historic environment.
- Support for the policy and in particular the inclusion of 'blue' in green and blue infrastructure. Welcome the inclusion of the district's surface water assets as strategic GBI assets. Recommend that the title of the policy is amended to 'Green and Blue Infrastructure'.
- Support for the strategic policies for sustainable growth and in particular those which recognise the value of green infrastructure and open spaces.

5. Green Belt / Conflict of sites with Green Infrastructure Policy:

- Protection, maintenance and enhancement of Green Belt areas should be based on the existing Green Belt not the amended one proposed in the draft Local Plan. Proposals for building on Green Belt don't match the intentions of this policy. No joined up thinking.
- Support for the aims of this policy but other proposals in the plan fail to comply with it. Example: the release of sites IL1/H and IL3/H from the Green Belt obliterates the only green corridor in Ben Rhydding from the moor to the River Wharfe.

6. Land ownership:

- The policy should recognise issues such as different types of land ownerships and where land is in private ownership with no public access, and different land uses.

7. Standards:

- Not clear how Green Spaces will be protected and how it feeds into housing allocations. Needs to be enforceable Green Space standards, with new developments not adversely affecting Green Space provision of existing homes. Need to identify areas of existing housing that do not meet Green Space standard and pro-actively look to Green Space opportunities. Improved enforcement is critical - could contributions from new build help to fund enforcement? Green Space technical report is not nuanced enough.

8. Travel networks

- Policy should recognise the need to join up green spaces with public/community transport enabling these spaces to be accessed sustainably by all and reducing impact caused to wildlife/green space and communities by increased traffic levels.
- Welcome the policy of enhancing access to green spaces and encouraging walking and cycling. Keen to see the development of greenways. Example: Bradford to Halifax via the Queensbury tunnel and extension of Great Northern Railway Trail from Thornton to Keighley. A strong commitment to Green Infrastructure with scheduled projects that establish a comprehensive, safe and attractive network for active travel is vital.
- Former railway lines, such as the Great Northern Railway Trail, should be included as a Green Infrastructure asset to be protected. Along this corridor wildlife is flourishing thanks to Bradford Urban Wildlife Group. This green linear corridor can link to other existing green space. Experience indicates that opportunities to connect spaces to existing walking and cycling networks has not been pursued by the Council.
- Support for the continued promotion of the Great Northern Railway Trail of the route between Keighley and Queensbury, and specific SP10 Active travel routes including public rights of way; footpaths, bridleways, cycle paths and greenways.

Comments

1. Additional Green Infrastructure:

- New GI could include new initiatives such as micro-forests, space that would otherwise have been used for cars can be used to mitigate the climate and biodiversity crisis. Also, cheap measures such as fence gaps for hedgehogs should also be used.

2. Blue Infrastructure:

- Specific reference should be made to the canal and 'blue' infrastructure in section Ac to make it clearer to decision makers that the canal forms part of the wider GI network and that the policy applies to the waterway corridor.
- Recommend a number of wording changes / additions to emphasise the 'blue' elements of GBI and to provide additional local distinctiveness in relation to the GBI assets which should be regarded as Strategic in the Bradford District.

3. Delivery:

- Section B should incorporate Building with Nature Standards as a mechanism for delivery.

4. Engagement:

- Greater reference to cross-boundary working within policies including SP10 Strategic Green Infrastructure.

5. General Support:

- Bradford and environs have an enormous potential and SP10 should be the main sales pitch for the plan.

6. Retention of existing Green Infrastructure:

- Existing mature GI should always be retained. Example: the copse on proposed development site IL1/H.

7. Site specific – ecological improvements:

- Broadly support the policy - it should allow for development and enhancement in any future draft. The site south of Shipley Golf Course/Hazel beck is allocated as a Local Wildlife Site. An Ecological Constraints Assessment has been carried out. It indicates that an area south of the site could be used for ecological improvement to offset any loss of habitat in the LWS.

Representation IDs: 292, 1912, 2279, 2518, 2753, 3059, 3253, 3563, 3605, 3678, 3760, 3813, 3951, 4527, 5013, 5339, 5455, 5467, 5856, 5987, 6765, 9803, 10955, 11405, 11544, 13577, 17174, 17289, 19838, 19933, 19935, 21804, 21887, 21916, 21945, 21974, 22003, 22032, 22064, 22093, 22122, 22151, 22191, 22220, 22249, 22278, 22307, 22336, 22365, 22476, 22505, 22534, 22563, 22601, 22630, 22659, 22688, 22717, 22746, 22790, 22819, 22857, 22886, 22915, 22944, 22973, 23002, 23031, 23060, 23116, 23145, 23174, 23203, 23232, 23261, 23290, 23319, 23348, 23377, 23406, 23435, 23610, 24122, 24166, 24205, 24318, 24347, 24376, 24405, 24436, 24465, 24550, 24579, 24628, 24703, 24741, 24770, 24848, 24935, 24964, 24993, 25023, 25053, 25087, 25138, 25192, 25221, 25433, 25482, 25711, 25740, 25769, 25798, 25827, 25856, 25885, 25914, 25943, 25972, 26001, 26030, 26059, 26088, 26117, 26146, 26175, 26204, 26233, 26262, 26292, 26327, 26356, 26569, 26684, 26716, 26759, 26802, 26831, 26860, 26889, 26918, 26949, 26978, 27010, 27039, 27068, 27121, 27150, 27179, 27208, 27237, 27269, 27298, 27327, 27356, 27385, 27414, 27443, 27565, 27690, 27724, 27797, 27828, 27856, 27892, 28191, 28281, 28386, 28995, 29058, 29130, 29182, 29184, 29214, 29567, 29607, 29635, 29808, 30006, 30087, 30170

2.14 POLICY SP11: PROTECTING THE SOUTH PENNINE MOORS SPA/SAC AND THEIR ZONE OF INFLUENCE

Overview

Policy SP11 sets out the Council's approach to protecting and enhancing the South Pennine Moors Special Protection Area/Special Area of Consultation (SPA/SAC) and addressing the potential impact of development with three zones of influence surrounding them. This includes setting out how such impacts could be mitigated. It is supported by the South Pennine Moors SPA/SAC Planning Framework Supplementary Planning Document (SPD).

In total, **170** representations from **167** respondents were submitted in relation to the contents of Policy SP11. These were received from local residents, Town/Parish Councils, agents'/planning consultants, a sub-regional environment organisation, elected members, developers, a wildlife trust, a footpath development group (Great Northern Railway Trail Development Group) and a government agency/body (Natural England).

Table 14.1: Question 12 - Policy SP11: Protecting the South Pennine Moors SPA/SAC and their Zone of Influence - Summary of Representations Received

Consultation Question 12 – Policy SP11: Protecting the South Pennine Moors SPA /SAC and their zone of influence

Number of Representations	Number of Respondents	Object	Support	Comment
170	167	151	12	7

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Off setting • Impact of wider designations • Green Belt • Fines • Enforcement • Independent HRAs • Legal process / Site selection • In combination effects / Duty to cooperate	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy NE3: Protecting the South Pennine Moors SPA/SAC in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Mitigation policy • Presumption in favour of sustainable development • General support • Policy strength • Habitat provision / recreation opportunities • Contributions and delivery • Site specific support for policy • Standards / Replacement provision • Zones • Financial commitment • Greenspace opportunities • Tourism • Site specific issues • Site specific mitigation • Zone A size • Policy implementation • Policy wording • Zonation	

Summary of Representations
Objections:
1. Off setting • Policy needs to be stronger. Destroying habitat cannot be off set be recreating it elsewhere.
2. Impacts of wider designations • The HRA does not conclusively state that it is the South Pennine Moors rather than the North Pennine Moors that will be affected by development in Burley-in-Wharfedale but merely states a likelihood. It also does not state the possibility of functional links to the North Pennine Moors AONB. This needs consideration alongside the impact on the SPA/SAC, particularly given the near river crossing that is used regularly by resident and visitors for recreation. Similar considerations also apply in Menston.
3. Green Belt • The new road and housing plans directly affect a Grade II listed house and land.
4. Fines

- Area should be left as they are. Requirements for developers will be ignored, and derisory fines do not work.

5. Enforcement

- Stronger protections need to be put in place including an effective system of enforcement.

6. Independent HRAs

- The proposed policy reflects the current policy which was watered-down at the Core Strategy examination. The Council must decide on independent HRAs carried out on all land within, as a minimum, the 2.5km zone, rather than relying on developers' assessments. To combine the 2.5km zone and 7km ignores those works cited in the bibliography of the SPD.

7. Legal process / Site selection

- The Council has not properly considered the very special significance of two key protected areas and has not correctly followed statutory requirements to select sites that do not affect the SAC/SPA. The plan is ignoring the protection of the South and North Pennine Moors SPAs/SACs, associated foraging land and protective zones.

8. In combination effects / Duty to cooperate

- The Council has not consulted/co-ordinated with neighbouring local authorities. The housing plans for Skipton (Craven) are putting pressure on the Moors and should have been considered in combination with Bradford's plans.

9. Mitigation policy

- Policy on mitigation of impact on SAC/SPA is illegal and would not be necessary if housing sites had been properly allocated.

10. Presumption in favour of sustainable development

- Underdeveloped areas, furthest away from highly protected sites are where housing should go first. The presumption in favour of sustainable does not apply in the vicinity of protected European sites.

Support:

General support

- Support for the proposed policy.
- Fully support and welcome this policy.
- Support for the strategic mitigation scheme and the mechanism for calculating the financial contributions required to mitigate the recreational impacts on the SPA/SAC as a consequence of housing growth.

1. Policy strength

- Support for the policy but it should be stronger. Damage to the moors has been done by fires, vehicles and ramblers during in covid by visitors who are unfamiliar with the need to protect the habitats.

• Protection of habitats also linked to climate change, pollution, activities experienced by farmers, and flood prevention measures.
2. Habitat provision / recreation opportunities • Support for the policy but there should be positive and proactive working with landowners and developers, particularly where they are able to facilitate substantial improvements to support habitat provision and other recreation opportunities outside of the SPA/SAC.
3. Contributions and delivery • Contributions to develop additional natural greenspace to reduce pressure on the moorland habitats should address the long-term management and maintenance of that greenspace. As the majority of Zone C is in parished areas, this provision should be delivered through town and parish councils.
4. Site specific • Support for the policy - however, compliance will require the removal of site IL1/H from the list of allocations.
5. Standards / Replacement provision • Support for the policy. However, under Point C3, the replacement of Green Space is not always possible. High standards need to be set in terms of replacement - an ancient habitat cannot be replaced with a new playpark. As assessment of the biodiversity lost should be made and new provision has to match this. Mature trees cannot just be replaced with saplings.
6. Zones • The zones of influence must be protected according to the policy. • Zone approach - question whether this is working in practice, any mitigation appears to come along after the development. Would question the practically of not providing car parking. Several uncontrolled parking areas (rough ground) are common and causes problems for enforcement and waste issues.
7. Financial commitment • Need evidence of planning and financial commitment. • CIL is not delivering the funding forecasted. Development in the 7km zone should be a last resort after development in towns and city on PDL sites. Any need for funding for mitigation should be provided up front or in early stages of development to ensure mitigation measures are delivered in a timely manner. Also suggest developers are encouraged to contribute by incorporation of defensive hedgerows in preference to close boarding fencing, protect and supplement existing trees.
8. Greenspace opportunities • The Great Northern Railway Trail should be identified as an opportunity to increase the amount of greenspace as a mitigation measure for schemes that come under this policy. This project needs to be registered as part of a mitigation management scheme.
Comments
1. Tourism

- There has been a lack consultation with Pennine Prospects. A substantial part of the Bradford countryside is within the South Pennines Park and its contribution to mitigating the effects of climate change are substantial. The area could be part of a developing tourism offer if treated with respect.

2. Site specific issues

- There are clearly challenges around habitats and it seems absurd that land at Carr Bank, Riddlesden is considered suitable for homes.

3. Site specific mitigation

- Queensbury and its hinterlands fall within Zone C - where development of homes needs to consider the recreational pressures placed on the SPA/SAC. The policy is supported as it allows for on or off-site mitigation to be provided and flexibility as to the best type of mitigation to be provided. The Queensbury Golf Course site will provide a large area of open space which could provide suitable mitigation and links to the existing public rights of way network.

4. Zone A size

- Due to the sensitivity of the habitats and species present, including disturbance, pollution and hydrological impacts, we consider the 400m Zone A to be extremely minimal and would encourage further consideration of widening this buffer to at least 1km. The implementation of strategy and policy to mitigate recreational and air quality impacts on the SPA/SAC should be encouraged.

5. Policy implementation

- The zones of influence must be protected in accordance with the policy.

6. Policy wording

- The policy should allow for evidence to demonstrate that SPA birds are not present on the land in question, rather than simply protecting habitat type, in order to ensure that the policy correctly reflects the Conservation of Habits and Specific Regulations 2017. Point C2 should be updated to read: "2. In Zone B it will be considered, based on such evidence as may be reasonably required, whether land proposed for development affects foraging habitat used by SPA birds. Further guidance can be found in the South Pennine Moors SPD."
- Section D of the policy which cross-references the SPD should make clear the specific part of the policy to which it applies and should be updated as follows: "D. The South Pennine Moors SPD sets out a strategic mitigation scheme and a mechanism for the calculation of the financial contributions under policy SP11 C 3b to mitigate recreational impacts on the SPA and SAC as a consequence of housing growth and subsequent population increases."
- These amendments will ensure that reference to the provision of new recreational greenspace or improve open space as having the potential to mitigate recreational pressure on the SPA/SAC as referred to in Policy CO1 is consistent with the provision of Policy SP11 and SPD.
- The policy does not state whether the partial inclusion of a site in Zone A excludes development across the whole or whether it is only that part of the site within the 400m zone is excluded. The policy should make clear that only areas within the 400m are affected and not the entirety of the site.

7. Zonation

- The exclusion of development within 400m (Zone A) is based on recommendations in the HRA of the draft Local Plan. The cited evidence originates from studies of lowland heathland, and the scientific evidence is very poor with a causal relationship between residential development within 400m and bird numbers or habitat degradation having never being established. There is no evidence that residential development within 400m of moorland habitat has any detrimental impact upon the integrity of the SPA/SAC. There is no empirical evidence in the HRA to suggest the assertion that 'urban edge effects' impact on upland habitats. Studies specific to lowland habitats cannot be transposed to upland habitats. The relevance to the qualifying species of the SPA has not been established. The HRA cities the impact pathway of cat predation but there is no evidence that cats have any adverse effects of bird populations. The policy zonation is entirely unjustified by any scientific evidence and should be removed from the policy.

Representation IDs: 293, 1913, 2284, 2520, 2756, 3274, 3679, 3777, 3816, 3965, 4677, 5358, 5377, 5466, 5988, 9804, 10913, 10957, 11406, 11545, 17290, 19839, 21615, 21805, 21888, 21917, 21946, 21975, 22004, 22033, 22065, 22094, 22123, 22152, 22192, 22221, 22250, 22279, 22308, 22337, 22366, 22477, 22506, 22535, 22564, 22602, 22631, 22660, 22689, 22718, 22747, 22791, 22820, 22858, 22887, 22916, 22945, 22974, 23003, 23032, 23061, 23117, 23146, 23175, 23204, 23233, 23262, 23291, 23320, 23349, 23378, 23407, 23436, 23611, 23629, 24123, 24167, 24206, 24319, 24348, 24377, 24406, 24437, 24466, 24551, 24580, 24629, 24704, 24742, 24771, 24849, 24895, 24936, 24965, 24994, 25024, 25054, 25088, 25139, 25193, 25222, 25434, 25483, 25712, 25741, 25770, 25799, 25828, 25857, 25886, 25915, 25944, 25973, 26002, 26031, 26060, 26089, 26118, 26147, 26176, 26205, 26234, 26263, 26293, 26328, 26357, 26570, 26685, 26717, 26760, 26803, 26832, 26861, 26890, 26919, 26950, 26979, 27011, 27040, 27069, 27122, 27151, 27180, 27209, 27238, 27270, 27299, 27328, 27357, 27386, 27415, 27444, 27566, 27595, 27641, 27644, 27691, 27725, 27798, 27829, 27893, 28192, 28282, 28387, 29215, 29568, 29608, 30007, 30088, 30171

2.15 POLICY SP12: STRATEGIC PLANNING FOR MINERALS

Overview

Policy SP12 provides an overarching framework setting out the Council's approach to minerals over the Local Plan. It seeks to ensure that the district's mineral resources are safeguarded to avoid un-necessary sterilisation and that there will be a sustainable approach to mineral working. This balance environmental considerations against the need to main an adequate and steady supply or minerals the needs of the economy and society.

In total, **7** representations from **7** respondents were submitted in relation to the contents of Policy SP12. These were received from local residents, Government agencies (Environment Agency; Historic England), an elected member and a sub-regional body.

Table 2.15.1: Consultation Question 13 - Summary of Representations Received

Consultation Question 13 - Policy SP12: Strategic Planning for Minerals				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
7	**7**	**3**	**1**	**3**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Consistency with policy • Availability of mineral resources • Policy support Provision of building stone • Policy support Restoration/aftercare of minerals sites • Supply of minerals • Sub-regional collaboration • Impact on the water environment • Provision of oil and gas policy	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy MIN1: Planning for Minerals in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Proposed development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building. • Council does not care about the environment and animals that need it.
2. Consistency with policy: • Policy must be compatible with the Council's climate targets. • Recommended that additional wording be incorporated within the policy to reflects this. • Would place a requirement on new minerals development to ensure that it meets key environmental targets, protects human/natural resources and was compatible with aim of achieving net-zero greenhouse gas emissions by 2038.
3. Availability of mineral resources: • Suggested that the district lacked mineral resources.
Support:
1. Provision of building stone: • Bradford District noted as a major supplier of high-quality building stone. • Policy supported as it would help to ensure a steady supply of building stone was available for the repair of historic buildings (locally and elsewhere) and new development in sensitive areas.
2. Restoration/aftercare of minerals sites: • Support for the high-quality restoration and after care of mineral sites.
Comments
1. Supply of minerals: • Priority 4 of the Leeds City SEP (Infrastructure for Growth) included a commitment to ensuring a sufficient supply of minerals and waste infrastructure to sustain/support growth. • Noted that the Plan contains a number of related policies on minerals and waste.

2. Sub-regional collaboration: • Engagement on minerals and waste matters at the sub-regional/City Region would be welcomed. • Could make use of sub-regional evidence sources, including the West Yorkshire Waste Capacity and Needs Assessment Model.
3. Impact on the water environment: • Needs to ensure that there would be no adverse impact of minerals (including oil and gas) activities on aquifers and surface and groundwater resources. • Suggested that any abstraction or dewatering activity related to minerals extraction may need a licence or an environmental permit, which should be referenced in the policy. • Should be consideration of delivering the Water Framework Directive (WFD) and River Basin Management Plan (RBMP) objectives and actions. • Minerals policies should protect biodiversity and the wider water environment and minimise disturbance to river banks and river, including when consideration site restoration. • Strategic planning for minerals should not be located in Source Protection Zone (SPZ) 1. • Should ensure minerals are worked in ways that don't increase flood risk, protect the floodplain and ensure that there are no adverse impacts of ancillary activities on the water environment.
4. Provision of oil and gas policy: • Potential for including a policy on Oil and Gas should be explored.
5. No comments: • Policy considered interesting but no comments made.

Representation IDs: 3680, 5465, 5989, 9805, 15826, 29059, 29185

2.16 POLICY SP13: WASTE MANAGEMENT INFRASTRUCTURE

Overview

Policy SP13 provides an overarching framework to minimise the effects of the generation and management of waste on the community and wider environment, as well as setting a guide to locating sites for sustainable waste management infrastructure. It also seeks to implement requirements of the Waste Framework Directive, including the Waste Hierarchy.

In total, **9** representations from **9** respondents were submitted in relation to the contents of Policy SP13. These were received from local residents, a Parish Council, a government agency (Environment Agency), an elected member and a sub-regional body.

Table 2.16.1: Consultation Question 14 – Summary of Representations Received

Consultation Question 14 - Policy SP13: Waste Management Infrastructure				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
9	**9**	**3**	**3**	**3**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Proposed waste to energy plant, Keighley • Impact on emissions • Waste hierarchy • Policy • Provision of waste infrastructure • Sub-regional collaboration • Overall policy approach • Need for environmental permits • Waste management responsibilities	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy WAS1: Planning for Sustainable Waste Management (Strategic Policy) in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations	
Objections:	
1. Proposed development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building. • Council does not care about the environment and animals that need it.	
2. Proposed waste to energy plant, Keighley: • The plant should not have been given planning permission.	
3. Impact on emissions: • Policy should include reference to minimising greenhouse gas emissions, particularly in the light of the Climate Change Emergency.	
Support:	
1. Waste hierarchy: • The waste hierarchy was supported, in particular encouraging the re-use of waste. However, there was objection to the energy form waste plant at Keighley. • More education and incentives required for the re-use and recycling of waste. • Need to address the issue of littering and fly-tipping. It is getting worse.	
2. Proposed waste from energy plant, Keighley: • Policy approach was supported, however the proposed incinerator at Keighley should be stopped. It is not consistent with the policy**.**	
3. Policy: • Policy approach was supported.	
Comments	
1. Provision of waste infrastructure:	

• Priority 4 of the Leeds City SEP (Infrastructure for Growth) included a commitment to ensuring a sufficient supply of minerals and waste infrastructure to sustain/support growth. • Noted that the Plan contains a number of related policies on minerals and waste.
2. Sub-regional collaboration: • Engagement on minerals and waste matters at the sub-regional/City Region would be welcomed. • Could make use of sub-regional evidence sources, including the West Yorkshire Waste Capacity and Needs Assessment Model.
3. Overall policy approach: • Encouraging that the Plan's vision, strategy, policies and site allocations reflect the need for an integrated and adequate network of waste management facilities. • Should ensure that the objectives and articles of the Waste Framework Directive are followed. • Support and encouragement for a move away from landfilling/incineration (without energy recovery) towards reduction, re-use and recycling.
4. Need for environmental permits: • Plan should highlight that waste facilities may require environmental permits to operate.
5. Waste management responsibilities: • Waste management was key responsibility of the Council together with identifying sites for facilities. • Polices surrounding waste collection should be reviewed with a view to reducing waste that was dumped in the countryside. • Nationally, manufacturers should be made to take responsibilities for their products.

Representation IDs: 294, 2758, 3275, 3681, 3969, 5382, 9806, 15827, 29187

2.17 POLICY SP14: MAKING GREAT PLACES

Overview

Policy SP14 sets out what is expected in terms of the overall quality of place in the district and seeks to embed the principles of good design at all levels of decision making. It provides a framework for the more detailed design Policies DS1 - DS5 in Section 4 and guidance in Homes and Neighbourhoods: A Guide to Designing in Bradford SPD.

In total, **21** representations from **20** respondents were submitted in relation to the contents of Policy SP15. These were received from local residents, agents/planning consultants, Town/Parish Councils, a local charity, a climate action group, a national environment organisation, an elected member, a sub-regional body (West Yorkshire Archaeology Advisory Service), a footpath development group (Great North Railway Trail Development Group) and Government agencies/bodies (Historic England, Natural England).

Table 2.17.1: Question 15 - Policy SP14: Making Better Places - Summary of Representations Received

Consultation Question 15 – Policy SP14: Making Great Places				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
21	**20**	**4**	**14**	**3**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • General objection to the policy • Green Belt development in South East Bradford • Network of green routes/spaces and connection to nature • Provision of strategic policy for the historic environment • Need to improve existing environments. • Open/Collaborative working and greater community engagement • Scope of the policy • Role of neighbourhood plans • Maintaining access to green space • Need to address commuting and working patterns.	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of Policy ST4: Creating Well Designed and Healthy Places in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Twenty-minute neighbourhoods • Linking the design of development to health and wellbeing • Consideration of places/communities within their wider context • General support • Provision of green routes and spaces • Great Northern Railway Trail • Contribution to, retention and reinforcement of local character • Need for greater community engagement/buy in • Maintaining links between landscapes and health/wellbeing • Links to Bradford District's heritage	

Summary of Representations
Objections:
1. General objection to the policy: • Policy considered to idealistic claptrap. The local area was not considered to be well-served by the Council.
2. Green Belt development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building. • Lack of care for local residents as well as the environment and the wildlife that needs it.
3. Network of green routes/spaces and connection to nature: • Policy wording could be strengthened to include a reference whereby the provision of a well-connected network of green routes and spaces also helps to connect people with nature.
4. Provision of strategic policy for the historic environment: • Local Plan highlighted as not containing a strategic policy for the historic environment, which sets out a positive strategy of its conservation and enjoyment. • Considered that thematic policy EN4 contained several elements that could form the basis of a strategic policy, highlighting elements of the district's historic environment that are of especial importance that will be a particular focus of conservation efforts. Policy wording was suggested.

Support:
1. Need to improve existing environments: • Policy was supported; however, it was noted that there are many deprived and neglected areas within Bradford that could be given a lift by cleaning up litter, provision of street trees, plants and flowers. • People should be helped to nurture and improve where they live instead of being to fall ill and depressed. Parts of the District are considered to be an absolute eyesore, whilst the cycle of neglect needed to be broken.
2. Open/Collaborative working and greater community engagement: • Policy was broadly supported. • References to open and collaborative working being viewed as necessary in order to help achieve best outcomes were welcomed. • Suggested that a similar positive and proactive approach should be included in other strategic policies that are considered to be essential to achieving high-quality places, beautiful housing and environments that are accessible for all. • Major gains for climate change, health and wellbeing, habitat improvements and biodiversity net gains would only be achieved by such open and collaborative working. • It was suggested that it could be strengthened by acknowledging the need to make it an empowering, "bottom up", community led process. • The principle engaging with and listening to local people, understanding local needs and opportunities, and co-creating development could be emphasised more clearly in the policy, as could the opportunity to work with civil society to achieve it.
3. Scope of the policy: • Principle of the policy was supported; however, its scope was considered to be too limited. • Great Places were not just defined by appearance or architectural merit, but also by the amenities and facilities they provide. They require pubs, shops, meeting places, public open spaces and other amenities/facilities. • Policy should focus on providing, retaining and promoting a diversity of community amenities and facilities.
4. Role of neighbourhood plans: • Overall principles of the policy were supported; however, it did not make clear the vital of neighbourhood plans in identifying and expressing local identity and development proposals in making strong local places
5. Maintaining access to green space: • Policy was considered to sound good, however it appeared to be undermined by contradictory policies and by practice. • Considered that contact with green space must be preserved to promote well-being. Noted that in areas of Bradford, people's only contact with nature was via "under-utilised land". Suggested that if it hosts wildflowers, it will host insects, then it will host birds, all of which can make powerful benefit to wellbeing.

• A law which makes destruction of the natural environment a crime would be supported.
6. Need to address commuting and working patterns: • Policy was supported; however, its approach should take into account future commuting and working patterns, in creating vibrant places. • Considered that local facilities must be improved to provide not just flexible office services, but a more vibrant local area to avoid the need travel into city centres. • New development should be required to provide local hubs including cafes and shops, so fewer journeys would be needed and cars become un-necessary. • Suggested that along with more provision of safe cycling and walking, car clubs should be widespread, thus reducing the need for car ownership.
7. Twenty-minute neighbourhoods: • Idea of 20-minute neighbourhoods, i.e. having access to facilities and social opportunities within 20 minutes walking time of home, was considered to be appealing. • Would wish to see this concept integrated more fully into the housing allocations - i.e. not allowed developments without sufficient access to facilities being built.
8. Linking the design of development to health and wellbeing: • Considered that developments should be designed to promote interaction and health, e.g. space of car parking is located away from homes. • Noted that Public Health England has published various guidance on the subject which should be taken into account.
9. Consideration of places/communities within their wider context: • Need to look at places within their local context. Ilkley should be seen as part of the wider Burley/Ilkley/Addingham community.
10. General support: • Policy approach was generally supported.
11. Provision of green routes and spaces: • Policy wording relating to the provision of well-connected green routes and spaces was supported. It was highlighted that the Great North Railway Trail was something endeavoured to do this within the district. • Noted that the provision of cycleway routes was viewed by the development industry as a liability, and as something to be provided as part of a planning obligation.

- There was a need for an improved understanding of good design from planned layouts to detailed matters to integrate a cycleway within new housing schemes.

12. Great Northern Railway Trail:

- Noted that the Great Northern Railway Trail (GNRT) was protected in existing plans and benefited from planning permission for the most part.
- Continued protection of the route between Keighley and Queensbury and references in emerging Local Plan policies to it were welcomed.

13. Contribution to, retention and reinforcement of local character:

- Policy was supported as it would help with those elements which contribute to the distinctive local character of the various areas of the district are retained and reinforced.
- In particular, the policy intention to create high-quality places, with proposals being required to understand the place and its wider context and create places with a local identify reflecting the district's varied and distinctive character, topography and features, was welcomed.
- Noted the NPPF requires that planning policies and decisions should, amongst other considerations, ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting.

Comments

1. Need for greater community engagement/buy in:

- Policy approach was considered to be potentially exciting.
- Suggested that people would want to know about what was happening to make their communities great places to live. It was further suggested that there may need to be greater publicity. There was also a need to overcome local scepticism.
- Considered that there was no evidence of this taking place in Keighley.

2. Maintaining links between landscapes and health/wellbeing:

- Noted that the district's existing landscapes provide a healthy place, encouraging people to exercise, increasing social interaction and reducing anti-social behaviour, isolation and stress, resulting in restorative, uplifting and healing for physical and mental health conditions.

3. Links to Bradford District's heritage:

- Policy makes little reference to Bradford District's heritage within the strategic policies and how it should be best preserved and conserved and influence future development to maintain a distinctive character & sense of place & achieve strategic priority 11 in SP2.
- Contrary to the intentions of the NPPF. Amended policy wording was suggested to address this matter

Representation IDs: 295, 2288, 2521, 2759, 3256, 3573, 3621, 3682, 3818, 3972, 4541, 5383, 5464, 9807, 13182, 15747, 17291, 19840, 28388, 29060, 29499

2.18 POLICY SP15: CREATING HEALTHY PLACES

Overview

Policy SP15 provides a strategic context to creating healthy places, introduces health impact assessments for major developments and policy on the location of new health facilities / infrastructure. It considers sustainable development alongside the LA's responsibility under the 2012 Health and Social Care Act to meet local health, and wellbeing needs and reduce health inequalities. It also tasks all stakeholders with a responsibility for sustainable development to co-ordinate and work effectively with health and social care partners.

In total, **166** representations from **166** respondents were submitted in relation to the contents of Policy SP15. These were received from local residents, Town/Parish Councils, agents/planning consultants, a restaurant chain, elected members, a sub-regional body (West Yorkshire Combined Authority), a footpath development group (Great Northern Railway Trail Development Group), Government agencies/bodies (Historic England, Sport England), the NHS, developers and a national heritage organisation (The National Trust).

Table 18.1: Question 16 - Policy SP15: Creating Healthy Places - Summary of Representations Received

Consultation Question 16 – Policy SP15: Creating Healthy Places				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
166	**166**	**147**	**15**	**5**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • General objections • Delivering policy aspirations • Green Belt development in South East Bradford • Managing food and drinks uses • Airedale General Hospital • Role of the historic environment • General support • Recognition of existing areas • Delivering the housing requirement/housing needs • Integration of policy	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of a revised Policy SC4: Provision of Health Infrastructure in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Delivery/implementation of policy • Addressing health inequalities • Role of public/community transport • Role of community groups/organisations • Support subject to wider objections being addressed. • Delivering policy • Requirement for Health Impact Assessments (HIAs) • Great Northern Railway Trail • Improving green infrastructure • General comments • And for cultivation • Delivery of policy aspirations • Urban design policies • Strengthening policy requirements • Active design principles • Creating healthy places	

Summary of Representations
Objections:
• No evidence of fiscal or forward planning. • Green belt loss – coalescence with Leeds and affect Grade II listed property. • No evidence of incidence of obesity and proximity to primary schools • Specifically restricting hot food takeaways rather than all food and drink uses is not supported by research. • Needs land release from GB to facilitate the hospitals operations. • Historic environment can have positive influence on people's health and wellbeing. This and contribution of attractive and well-designed places need acknowledging in the policy. Additional condition wording to B1 needs offered
1. Delivering policy aspirations: • Approach was considered be a great set of aspirational policies that the plan seeks to deliver. • However, was no evidence of fiscal or forward planning to support delivery.
2. Green Belt development in South East Bradford:

- Objection to Green Belt development in South East Bradford in particular the Tong area.
- Majority of people disagree with plans for housing and a new road in the area.
- Development would affect a Grade II Listed Building.
- Lack of care for local residents as well as the environment and the wildlife that needs it.

3. Managing food and drinks uses:

- Controls on the over-concentration of food and drink uses where high levels of obesity, deprivation, health inequalities and general poor health were supported.
- However, evidence on the relationship between the proximity of such uses and incidences of obesity was weak and conflicting.
- Was no mechanism for any link between incidences and proximity to primary schools. Pupils highlighted as not travelling to/from schools unaccompanied.
- Inclusion of youth centres viewed as problematic as researched focussed on secondary schools or the diet of pupils.
- Specifically restricting hot food takeaways rather than all food and drink uses was not supported by research.

4. Airedale General Hospital:

- Policy, supporting text and relevant evidence base should acknowledge the exceptional circumstances to release land from Green Belt to facilitate the hospital's operations.
- Would be necessary to comply with the NPPF.

5. Role of the historic environment:

- Historic environment can have a positive influence on people's health and wellbeing.
- This, and the contribution that attractive and well-designed places can have on health, and wellbeing needs to be acknowledged in the policy.
- Additional wording for part B1 of the policy was suggested to reflect this.

Support:

- Must include existing areas Policy applies to new developments, planning needs to be more proactive and assess existing areas.
- Need more schools, health services etc.
- Improvements needed to strength and delivery of policy that integrate with other strategic policies.
- More emphasis on health inequalities.
- Mechanism needed to assess impact on inequalities of all decisions.

- More confident and vocal residents appear to have unfair advantage.
- Could improve by referencing the role of public & community transport alongside active travel – less polluted lifestyles enable more active lives.
- Need to nurture volunteering, community projects, local clubs & civic society.
- Support subject to objections to SP6 & SP8
- Approved policy is not followed through when planning schemes are submitted or support is required to create off road cycleways.
- Professional design skills are needed in the planning department so such policies can be made meaningful in practice.
- Support SP15 as provides overarching framework but HIA or HIA screening, as in CO3 is considered an unnecessary requirement as it can be addressed with Planning Policy statements and Design and Access statements without the need for a further report.
- With major residential applications HIA matters would be considered by officers.
- Support policy but do not think it is feasible as Bradford is one of the unhealthiest places to live. Need more resources and determination.
- Support policy and benefits and recognition that improving Green Infrastructure & access to it can support healthy lifestyles. GI should form an integral aspect of good design particularly in new developments.

1. Recognition of existing areas:

- Considered that the plan should also focus on existing built-up areas and existing residents as well as new developments.
- If more homes are built, more schools, health services etc will need to be created. Would be never ending.
- Queried whether planning could take a more proactive and assess existing areas to determine what could be done to improve health in those communities.

2. Delivering the housing requirement/housing needs:

- Policy recognised as being of great importance and as such was supported.
- Suggested that there were amendments that could improve the policy and its delivery (as well as the Plan as a whole)
- Considered that part of the Council's health and wellbeing strategy should be the delivery of sufficient homes of high quality, including a strong affordability component.
- Baseline housing requirement set out in the draft Plan did not go far enough to meet the real extent of housing need.
- Issue has been recognised in corporate strategies but not given strength, adequate weight and positive direction on the Local Plan.

3. Integration of policy:

- Noted that the policy sought to direct development towards connected locations to encourage active travel.

• Considered important that the strategic and other policies are better integrated and show joined up thought to ensure their beneficial delivery.
4. General support: • Policy and its principles were generally supported. • Considered that it can make places healthier, happier and nicer.
5. Delivery/implementation of policy: • Policy was supported; however, it was not thought is feasible to deliver/implement as Bradford is one of the unhealthiest places to live. • Needed more than existing resources and determination to make a difference.
6. Addressing health inequalities: • Policy was supported; however, it needed to have more explicit emphasis on addressing health inequalities. • Planning was noted as having a big impact on them in terms of a fair distribution of health-promoting resources and health-depriving resources. • A mechanism was needed to assess impact on inequalities of all decisions. Considered that more confident and vocal residents appear to have unfair advantage.
7. Role of public/community transport: • Policy was supported. • Suggested that it could be improved by referencing the role of public & community transport alongside active travel in creating more healthy, less polluted environments and enabling more active lifestyles.
8. Role of community groups/organisations: • Policy was supported. • Suggested it could reference the importance of volunteering, community projects, local clubs & civil society to health and wellbeing. Such activities should be nurtured and supported. • Enabling wider access to them could have a beneficial effect on health and wellbeing, whilst supporting place-making and sustainability.
9. Support subject to wider objections being addressed:

- Policy was supported subject to wider objections to the strategic employment and housing policies being addressed.

10. Delivering policy:

- Policy strengthens the existing planning policies on this matter.
- Concern that approved policy was not followed through when planning schemes were submitted or when funding and legal support was required to create opportunities for off-road cycleways.
- Suggested that professional design skills are needed in the planning department so such policies can be made meaningful in practice.

11. Requirement for Health Impact Assessments (HIAs):

- Policy intention of encouraging developments to positively design for creating healthy place was supported.
- Considered that the requirement for HIAs or HIA screening, as required in Policy CO3 was unnecessary.
- Can be addressed within Planning Policy statements and Design and Access statements without the need for a further report**.**
- Requested that Policy CO3 be removed from the Plan.

12. Great Northern Railway Trail:

- Continued protection of the Great Northern Railway Trail route between Keighley and Queensbury and references within relevant policies were welcomed.

13. Improving green infrastructure:

- Policy was supported.
- Benefits of improving green infrastructure and access to it, and recognition that can support healthy lifestyles were noted.
- Green infrastructure should form an integral aspect of good design particularly in new developments.

Comments

- Should be a requirement for developers to replace topsoil in new housing developments to ensure the land can be cultivated.
- Policies could be further strengthened by making welcoming and safe routes to school as a requirement.
- Wording of SP15 could be stringer by using ‘development proposals must show & ‘it is expected that developments will…’
- Welcome criterion 3 as it recognises Active Design, but the policy or the supporting text needs to include more information on the principle of Active Design. Consider Wakefield’s Local Plan Policies and Appendices.
- An essential aspect for well-being – Wharfedale is blessed with many such areas.

1. Land for cultivation:

- Noted that developments result in the removal of topsoil to leave poor quality gardens.
- Should be a requirement for developers to replace topsoil in new housing developments to ensure the land can be cultivated.

2. Delivery of policy aspirations:

- Approach was considered be a great set of aspirational policies that the plan seeks to deliver.
- However, was no evidence of fiscal or forward planning to support delivery.

3. Urban design policies:

- Inclusion of urban design policies were supported.
- Ambition to significantly improve quality in housing and neighbourhood design, and to create inclusive, accessible, distinctive and healthy places was also welcomed.
- Noted that the district's younger population was reflected in policies prioritising green space, doorstep play and safe routes to play destinations.
- Suggested that policies could be strengthened by including references to welcoming and safe routes to school as a requirement.

4. Strengthening policy requirements:

- Policy was welcomed, including the requirement for Health Impact Assessments.
- Sets out aspirations for high-quality spaces that promote physical and mental health and social interaction and discourage the use of private cars.
- Policy wording could be stronger with text being more explicit regarding development requirements.

5. Active design principles:

- Recognition of active design within the policy (criterion 3) was welcomed.
- Suggested that the policy or the supporting text needed to include more information on the principles of Active Design, with reference being made to Sport England's/Public Health England's Active Design Guidance.
- Wakefield's Local Plan was highlighted as example of how Active Design principles had been addressed.

6. Creating healthy places:

- Considered that creating healthy place was an essential aspect for wellbeing.
- Wharfedale highlighted as being blessed with many such areas.

Representation IDs: 26717, 26760, 26803, 26832, 26861, 26890, 26919, 26950, 26979, 27011, 27040, 27069, 27122, 27151, 27180, 27209, 27238, 27270, 27299, 27328, 27357, 27386, 27415, 27444, 27566, 27595, 27641, 27644, 27691, 27725, 27798, 27829, 27893, 28192, 28282, 28387, 29215, 29568, 29608, 30007, 30088, 30171, 3680, 5465, 5989, 9805, 15826, 29059, 29185, 294, 2758, 3275, 3681, 3969, 5382, 9806, 15827, 29187, 295, 2288, 2521, 2759, 3256, 3573, 3621, 3682, 3818, 3972, 4541, 5383, 5464, 9807, 13182, 15747, 17291, 19840, 28388, 29060, 29499, 296, 1914, 2294, 2523, 2762, 3258, 3683, 3825, 3974, 4544, 5386, 5463, 5718, 5860, 9808, 11407, 15824, 17292, 19660, 19826, 21616, 21806, 21889, 21918, 21947, 21976, 22005, 22034, 22066, 22095, 22124, 22153, 22193, 22222, 22251, 22280, 22309, 22338, 22367, 22478, 22507, 22536, 22565, 22603, 22632, 22661, 22690, 22719, 22748, 22792, 22821, 22859, 22888, 22917, 22946, 22975, 23004, 23033, 23062, 23118, 23147, 23176, 23205, 23234, 23263, 23292, 23321, 23350, 23379, 23408, 23437, 23612, 24124, 24168, 24207, 24320, 24349, 24378, 24407, 24438, 24467, 24552, 24581, 24630, 24705, 24743, 24772, 24850, 24937, 24966, 24995, 25025, 25055, 25089, 25140, 25194, 25223, 25435, 25484, 25713, 25742, 25771, 25800, 25829, 25858, 25887, 25916, 25945, 25974, 26003, 26032, 26061, 26090, 26119, 26148, 26177, 26206, 26235, 26264, 26294, 26329, 26358, 26571, 26686, 26718, 26761, 26804, 26833, 26862, 26891, 26920, 26951, 26980, 27012, 27041, 27070, 27123, 27152, 27181, 27210, 27239, 27271, 27300, 27329, 27358, 27387, 27416, 27445, 27567, 27692, 27726, 27799, 27816, 27830, 27894, 28193, 28283, 28389, 28996, 29061, 29216, 29569, 29609, 30008, 30089, 30172

2.19 POLICY SP16: WORKING TOGETHER

Overview

Policy SP16 sets out the Council's approach to effective collaboration with its various partners at the local and sub-regional/Leeds City Region level to delivering the vision and objectives of the Plan as well as the district's future growth requirements, alongside wider sub-regional programmes. It also highlights the importance of meeting the Duty to Co-operate.

In total, **160** representations from **160** respondents were submitted in relation to the contents of Policy SP16. These were received from Town/Parish Councils, local residents, elected members, neighbouring authority elected members, a footpath development group (Great North Railway Trail Development Group), a government agency/body (Natural England) and neighbouring local authorities.

Table 2.19.1: Question 17 - Policy SP16: Working Together - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
160	**160**	**145**	**6**	**9**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Delivery/achievement of the policy • Community engagement/participation • Proposed development in South East Bradford • Local Nature Partnerships • Support working with Town/Parish Councils • General support • Engagement with communities and voluntary sector • Cross boundary working • Delivery/achievement of policy • Joint working in relation to the South Pennines area • Engagement with other organisations/bodies • Cross boundary working • Impact on infrastructure/services in North Yorkshire	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of the Regulation 19 Publication Draft. The contents of this policy are now covered within multiple policies in the Draft Plan. This reflects changes to national policy and the format of the new Plan.

• Engagement with Kirklees Council officials, members and communities • Impact on education services in Kirklees • Reference policy to cross-boundary working. • Impact on infrastructure/services in Leeds • Impact on former Harrogate Borough Council area	

Summary of Representations
Objections:
1. Delivery/achievement of the policy: • Considered to be a good set of goals but surprised to note they are part of an evolving context. • Eager to understand the Council's intention to attract new business/investment and solve a range of issues over the short, medium and long terms. • Short term issues to be addressed included: presence of a business team that has a clear focus with well-defined objectives; an immediate need to reskill manufacture workforce; adopt/implement a strategy to reverse the decline in education standards; turn unviable brownfield land into viable brownfield land. • Medium term issue – changing the course of the economy from manufacturing to a greener, knowledge-based economy. • Long term issue – how the council intends to stay ahead of the curve in employment terms. • Should indicate how the Council will address these issues and measure its success or failure.
2. Community engagement/participation: • Considered that objections of the community are ignored in favour of developers. • Policy wording only pays lip service by including a token reference to the stakeholders and communities of the district. • For a true working together approach, involvement of local communities needs to be more prominent and given a stronger voice. Suggested that participants on Planning Committees should be made more accountable. • Should be greater recognition that the Council is employed to serve its population and not allow developers and businesses to be unchallenged**.**
3. Proposed development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area.

- Development would affect a Grade II Listed Building.
- Lack of care for local residents as well as the environment and the wildlife that needs it.

4. Local Nature Partnerships:

- Suggested that the policy's supporting text was amended to make reference to Local Nature Partnerships (LNPs). Would be in accordance with paragraph 25 of the NPPF.

Support:

1. Working with Town/Parish Councils:

- Aspiration of working more closely with Town/Parish Councils was supported. Noted that 43% of the district's electorate was represented by a local council.
- A way to achieve this would be to encourage and support the development of more neighbourhood plans for both parished and unparished areas.

2. General support:

- Policy approach was generally supported.
- Continued protection for the route of the Great Northern Railway Trail was supported as was the need for effective collaboration between the Council and other bodies.

3. Engagement with communities and voluntary sector:

- Policy should include reference to the importance, and great value to be derived from working with the community and voluntary sector, especially to ensure diverse groups are involved and local voices heard in creating change.
- Should also be recognised that through engaging communities in the range of work referred to it produces greater social value, community cohesion and equality benefits, as well as more sustainable forms of development.

4. Cross boundary working:

- Cross boundary local authority issues must be addressed before changes to the settlement hierarchy or distribution occur.

5. Delivery/achievement of the policy:

- Goals considered to be good; however, more details were needed setting out they will be achieved over the short, medium and long terms.

Comments

1. Delivery/achievement of the policy:

- Considered to be a good set of goals but surprised to note they are part of an evolving context.

- Eager to understand the Council's intention to attract new business/investment and solve a range of issues over the short, medium and long term.
- Short term issues to be addressed included: presence of a business team that has a clear focus with well-defined objectives; an immediate need to reskill manufacture workforce; adopt/implement a strategy to reverse the decline in education standards; turn unviable brownfield land into viable brownfield land.
- Medium term issues to be addressed including changing the course of the economy from manufacturing to a greener, knowledge-based economy.
- Long term issue to be addressed was how the council intends to stay ahead of the curve in employment terms.
- Should indicate how the Council will address these issues and measure its success or failure.

2. Joint working in relation to the South Pennines area:

- Highlighted that Pennine Prospects brings together a range of bodies for joint working covering the South Pennines area. Bradford Council noted as one of the contributing parties.

3. Engagement with other organisations/bodies:

- Policy approach was generally supported, if mechanisms were set up for proper engagement with groups/organisations with experience to work with the Council to better achieve its objectives, rather than working alone.
- Experience has does not reflect reality. Should not be just about talking to understand but should be followed by joint commitment to common objectives.
- Policies can be a paper exercise that does not mean much unless attitudes to change to working better with groups.

4. Cross boundary working:

- Cross boundary local authority issues must be addressed before changes to the settlement hierarchy or distribution occur.
- Little reference made to potential and actual developments in the Leeds City Council area and their connection to and impact on Menston.
- Concerns over cross-boundary discussions between Bradford and Leeds. Suggested that this was not taking place, despite assurances that officials were having discussions. Highlighted that one development was brought to the attention of Leeds officials via the local media.

5. Impact on infrastructure/services in North Yorkshire:

- Noted that a significant of development was proposed in the Airedale and Wharfedale areas, close to the North Yorkshire boundary.
- Likely to give rise to matters of strategic significance in relation to highways and education requirements.
- Further discussion welcomed to ensure proposals do not give to increased demand on infrastructure/services in North Yorkshire.

6. Engagement with Kirklees Council officials, members and communities:

• Requested that Kirklees officers, members and communities in areas close development proposals continue to be consulted as they evolve to ensure cross-boundary issues are fully considered.
7. Impact on education services in Kirklees: • Kirklees Council would wish to review further evidence as it emerges relating to the impact of proposed developments on education within its area.
8. Reference policy to cross-boundary working: • Suggested that greater reference to cross-boundary is made in a number of emerging Local Plan policies including those relating to the highway network (Policies SP1 and SP3), the White Rose Forest (Policy EN3), Mass Transit (Policy SP6) and strategic Green Infrastructure (Policy SP10).
9. Impact on infrastructure/services in Leeds: • Noted that additional work was to be carried out on the cumulative impact of the plan and its allocations on the Leeds City Council area and services within it such as highways, flooding, schools, freight park, biodiversity and site requirements. • Position was reserved until further evidence/information was provided through consultation and Duty to Co-operate.
10. Impact on former Harrogate Borough Council area: • No significant and/or unresolved cross-boundary issues between Bradford and the former Harrogate Borough Council area. • Suggested that further contact/discussion should take place in relation to impacts of development in Wharfedale on the Nidderdale AONB.

Representation IDs: 1915, 2527, 3260, 3684, 3975, 4555, 4679, 5391, 9809, 11408, 12541, 17293, 19854, 21617, 21807, 21890, 21919, 21948, 21977, 22006, 22035, 22067, 22096, 22125, 22154, 22194, 22223, 22252, 22281, 22310, 22339, 22368, 22479, 22508, 22537, 22566, 22604, 22633, 22662, 22691, 22720, 22749, 22793, 22822, 22860, 22889, 22918, 22947, 22976, 23005, 23034, 23063, 23119, 23148, 23177, 23206, 23235, 23264, 23293, 23322, 23351, 23380, 23409, 23438, 23613, 24125, 24169, 24208, 24321, 24350, 24379, 24408, 24439, 24468, 24553, 24582, 24631, 24706, 24744, 24773, 24851, 24938, 24967, 24996, 25026, 25056, 25090, 25141, 25195, 25224, 25436, 25485, 25714, 25743, 25772, 25801, 25830, 25859, 25888, 25917, 25946, 25975, 26004, 26033, 26062, 26091, 26120, 26149, 26178, 26207, 26236, 26265, 26295, 26330, 26359, 26572, 26687, 26719, 26762, 26805, 26834, 26863, 26892, 26921, 26952, 26981, 27013, 27042, 27071, 27124, 27153, 27182, 27211, 27240, 27272, 27301, 27330, 27359, 27388, 27417, 27446, 27568, 27693, 27727, 27800, 27831, 27857, 27895, 28194, 28284, 28390, 29217, 29570, 29610, 29630, 29677, 29995, 30009, 30090, 30173

2.20 POLICY EC1: EMPLOYMENT LAND DELIVERY AND STRATEGIC SITES

Overview

Policy EC1 establishes the broad spatial distribution of employment floor space across the strategic economic growth areas of Regional City of Bradford, Airedale and Apperley Bridge/Esholt; and establishes the sites being taken forward for allocation to deliver the employment land requirement over the plan period.

In total, 10 representations from 8 respondents were submitted in relation to the contents of Policy EC1. These were received from local residents, developers, landowners, agents/planning consultants, a government agency/body (Highways England) and a Chamber of Commerce.

Table 2.20.1: Question 18 - Policy EC1: Employment Land Delivery and Strategic Sites - Summary of Representations Received

Consultation Question 18 - Policy EC1: Employment Land Delivery and Strategic Sites				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
10	**8**	**4**	**3**	**3**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Employment allocations • Employment allocations • Evidence base • General support • Comments on housing growth, Green Belt and Employment Allocations	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of the revised Policy EC1: Employment Sites in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
Employment Allocations • Objection that the policy does not allocate land of appropriate size, type or location to meet employment land needs and deliver economic growth. • Objection to site NE24/E as an allocation as the site has commenced development. • Objection to the inclusion of NE22/E and NE23/E as employment allocations as the site has an existing planning application.
• General objection to the Local Plan (not specific to this policy)
Support:
Employment Allocations • Request to consider reallocation of brownfield employment land to avoid further greenbelt release for housing (example of NE23/E)
Evidence Base • National Highways requesting that the location of employment development within established employment areas should be supported by a robust transport evidence base.
General Support • National Highways stating support of Policy EC1 and its aspirations.
Comments
Housing and Employment Growth • Housing delivery targets have not increased along with job creation targets when compared with the Core Strategy
Greenbelt • Request to reconsider the release of greenbelt land for employment use.
Employment Allocations • Request to reconsider the Richard Dunn Centre site as an employment allocation.

Representation IDs: 3685, 3981, 11026, 13824, 15406, 17117, 18069, 18082, 25249, 30220

2.21 POLICY EC2: ENTERPRISE, BUSINESS AND EMPLOYMENT ZONES

Overview

Policy EC2 establishes the creation of Enterprise Zones, Business Development Zones and Employment Zones in existing industrial estates across the Bradford District. The policy looks to encourages investment within these areas and safeguards the loss of traditional B-Use Class developments from competing uses.

In total, **5** representations from **5** respondents were submitted in relation to the contents of Policy EC2. These were received from a local resident, developers, an agent/planning consultant, a sub-regional body (West Yorkshire Combined Authority), a Chamber of Commerce and a neighbouring local authority.

Table 21.1: Question 19 - Policy EC2: Enterprise, Business and Employment Zones - Summary of Representations Received

Consultation Question 19 - Policy EC2: Enterprise, Business and Employment Zones				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
5	**5**	**1**	**0**	**4**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • General objection • Comments on Employment Zones	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy EC2: Employment Zones in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
• General objection to the Local Plan (not specific to this policy)

Support:
No comments in support of this policy.
Comments
Employment Zones • Incentives to support the Enterprise Zones are ending on 31 March 2022, this may render the concept of Enterprise Zones obsolete. • Concern that removal/reduction of Employment Zones may result in insufficient land being available for employment development. • Westgate Hill Street Employment Zone is located within Adwalton Registered Battlefield
Housing and Employment Growth • Housing delivery targets have not increased along with job creation targets when compared with the Core Strategy (2017).

Representation IDs: 3686, 11027, 15822, 25250, 29644

2.22 POLICY EC3: EMPLOYMENT AND SKILLS DELIVERY

Overview

Policy EC3 establishes a framework for encourage employment and skills growth, primarily through major developments. The policy focuses on enhancing skills attainment through a number of mechanisms, with emphasis on residents within deprived areas.

In total, **3** representations from **3** respondents were submitted in relation to the contents of Policy EC3. These were received from local residents and developers (and agents/planning consultants).

Table 2.22.1: Question 20 - Policy EC3: Employment and Skills Delivery - Summary of Representations Received

Consultation Question 20 - Policy EC3: Employment and Skills Delivery				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
3	**3**	**1**	**1**	**1**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • General objection to Local Plan • Policy additions • Comment on housing and employment growth	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy EC3: Employment Skills and Delivery in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
• General objections to the Local Plan (not specific to this policy)
Support:
Policy Additions

• Request to include the caveat "wherever possible" to Part A of the policy
Comments
Housing and Employment Growth • Housing delivery targets have not increased along with job creation targets when compared with the Core Strategy (2017).

Representation IDs: 3687, 11028, 27779

2.23 POLICY EC4: CITY, TOWN, DISTRICT AND LOCAL CENTRES

Overview

Policy EC4 sets out the network and hierarchy of centres and the role each will play including the type and scales of development appropriate in each centre. Policy EC4 links to Strategic Policies SP2, SP3, SP4 and SP6, and will enhance the role and function of existing and proposed new centres within the City of Bradford, Airedale, Wharfedale and South Pennines.

In total, **11** representations from **10** respondents were submitted in relation to the contents of Policy EC4. These were received from local residents, a cultural organisation (Theatres Trust), Town/Parish Councils, an elected member, a landowner/developer, an agent/planning consultant, a government agency/body (Sport England), and the Chamber of Commerce.

Table 2.23.1: Question 21 - Policy EC4: City, Town, District and Local Centres - Summary of Representations

Consultation Question 21 - Policy EC4: City, Town, District and Local Centres				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
11	**10**	**2**	**3**	**6**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • General objection to Local Plan • General support on attention given to Keighley • Support on promoting cultural uses within the area's town centres • General comments	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy TC1: Hierarchy of Centres in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
• General objection to the Local Plan (not specific to this policy)

Support:
• Welcomes the attention given to the Keighley town centre in the local plan especially the proposed town centre boundary and its inclusion in Policy EC4.
• The Theatre Trust welcomes the support given through this policy to promoting cultural uses within the area's town centres, and the encouragement of temporary uses for creative and cultural purposes.
Comments
• Suggestion to reconsider HFT Policy to provide stronger protection for local neighbourhoods from any unwanted impacts of such establishments. • Local Shops are important as they reduce the need to travel further. • Suggestion to extend the boundary of Queensbury Local Centre to include recent retail development adjacent to the current boundary. • General support to the policy content encouraging diversity of uses and supporting the vitality and viability of retail centres. • Suggestion to provide policy support emboldening the role of existing markets and allocating space for new ones. • Suggestion to include policies guiding creation of new local shops.

Representation IDs: 266, 3239, 3277, 3688, 9810, 10960, 16262, 16276, 16726, 19670, 25251

2.24 POLICY TR1: STRATEGIC TRANSPORT DELIVERY

Overview

Policy TR1 establishes how the Council will look to manage and improve the existing highways, public transport, walking and cycling networks which will deliver the aspirational growth proposed through the Local Plan and other regeneration initiatives. The Council will support, safeguard and prioritise a programme of strategic improvements through investment and management priorities of the district.

In total, **23** representations from **8** respondents were submitted in relation to the contents of Policy TR1. These were received from local residents, a cycling campaign group, a local environmental organisation/group, a sub-regional body (West Yorkshire Combined Authority), a Town/Parish Council, Government agencies/bodies, a footpath development group (Great Northern Railway Trail Development Group).

Table24.1: Question 22 - Policy TR1: Transport and Environment - Summary of Representations Received

Consultation Question 22 - Policy TR1: Strategic Transport Delivery				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
23	**8**	**8**	**9**	**6**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • A65 highway improvement • Road building • Active travel • Support for policy • Cycling • Minibuses • Rail stations • Sustainable travel • Bus lanes	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy TR1: Integrating Sustainable Transport and Development in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Public Rights of Way – bridleways • M606 • Alignment with evidence base	

Summary of Representations
Objections:
1. A65 highway improvements • Absence of improvements to A65 in Menston and Ilkley unacceptable • Already a heavily congested and overwhelmed route • Fails to recognise that the route is a major through route from West Yorkshire to the North West, M6 and Scotland.
2. Road building • No support for road building – will lead to more traffic • There is concern about the impact of Bradford-Shipley Route Improvement Scheme on Shipley. This road scheme is designed to increase road carrying capacity and, as a result, will lead to an increase in the volume of traffic. Induced demand is a well-known and well-researched consequence of more road-building. • Section E on highways suggests improvements to junctions and roads in the name of 'efficiency': 'efficiency' must be for ALL road users and highways developments should be subject to the continued prioritisation of cycling over motor vehicle traffic.
3. Active travel • Disproportionate allocation of public transport and active travel across the city
4. SELBR -required as a strategic link between in the M62 and Leeds Bradford Airport – no part of this appears in the plan.
Support:
1. Support for policy • Aspires to deliver transport infrastructure and network improvements to support the quantum of development within the Local Plan.
2. Cycling • Support for expanding and improving the network of off-road inter-urban town cycle routes, in particular the Queensbury tunnel
3. Minibuses • Support for policy, however no mention of minibuses. These encourage shared transport.
4. Sustainable travel • Support for improving sustainable travel options e.g. cycling and pedestrian options.

• Active travel options for Shipley provided
5. Great Northern Trail (connection from Cullingworth via Crossroads and Woodhouse) – support of the inclusion of this scheme in the local plan
6. Support for the inclusion in the plan of the Wharfedale Greenway, a long-overdue safe means of active transport between neighbouring communities, and suggest that work on this project is prioritised to allow its realisation early in the development of any site, i.e. as soon as practically possible, rather than risk its non-completion through delay
Comments
1. Rail stations 7. Missed connection between the new Bradford rail station and Forster Square has been ignored.
2. Bus Lanes 8. Problematic through Bradford with the continually changing road priority.
3. Public Rights of way - Bridleways 9. Network fragmented 10. Inclusion in active travel strategy 11. Equestrians to be consulted
4. M606 • Noted that M606 Junction 2 is referenced for improvements within the Policy, but further details will be needed to be provided to Highways England regarding this aspiration as the Plan emerges
5. Alignment with evidence • aspirations within Policy TR1 need to be aligned with the transport evidence base to ensure the most appropriate interventions are identified, as well as ensuring that they have funding, timescales and implantation identified
6. The supporting text paragraph 4.6.8, which states '*In an effort to manage and improve the existing highways, public transport, walking and cycling networks, which will deliver the aspirational growth proposed through the Local Plan and other regeneration initiatives, the Council will support, safeguard and prioritise a programme of strategic improvements. Strategic transport investment and management priorities of the District are as follows:'* would be more usefully included in the policy itself and not in the supporting text
7. Criterion B3 there is reference to protecting rail sidings and extension sites. The Policy needs updating as it currently states 'at sites xx' and we would welcome engagement on developing this Policy. We would expect the detail on this to be informed by Network Rail.
8. TR1 A5 & TR1 B2 - There is no mention of the footbridge or safe crossing across the A629 (at Silsden) within this table.

Representation IDs: 1018, 3278, 3584 ,3689 ,3769, 3829, 4885, 5403, 5501, 5932, 9811, 12153, 13809, 15407, 15832, 16298, 16723, 17294, 18170, 19938, 24273, 28057, 28391

2.25 POLICY TR2: TRANSPORT AND ENVIRONMENT

Overview

Policy TR2 establishes how the Council will look to minimise impact of new developments and transport schemes upon the human, natural, built and historic environments; and through its decisions, the Council will seek to improve the environmental efficiency of the transport system.

In total, **12** representations from **12** respondents were submitted in relation to the contents of Policy TR2. These were received from local residents, a cycling campaign group, a local environmental organisation/group, a sub-regional body (West Yorkshire Combined Authority), a Town/Parish Council, Government agencies/bodies (Historic England, Natural England), a footpath development group (Great Northern Railway Trail Development Group) and a neighbouring local authority.

Table 2.25.1: Question 23 - Policy TR2: Transport and Environment - Summary of Representations Received

Consultation Question 23 - Policy TR2: Transport and Environment				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
12	**12**	**5**	**5**	**2**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Policy impact • General objection to Local Plan • Overall policy approach • Bradford to Shipley Road scheme • Carbon emissions • Biodiversity net gain • General support • Support reduction in car use. • Support overall policy approach.	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy TR2: Integrating Sustainable Transport and Development in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Support Great Northern Railway Trail (GNRT) • support impact on environment. • comments on reducing CO_2 emissions from transport and impact on Kirklees Metropolitan Council area	

Summary of Representations
Objections:
1. Policy Impact • Policy does not go far enough to address the climate emergency
2. General objection to the Local Plan (not specific to this policy)
3. Overall policy approach: • Recognition of the need to include environmental consideration in all transport plans was welcomed. • Policy aims should be an overarching requirement in all policies rather than being considered solely in a separate policy.
4. Bradford to Shipley road scheme: • Scheme considered to be in direct contradiction to the climate emergency declaration and other transport policies. • Would encourage more traffic and worsen already existing environmental problems e.g. carbon emissions, air and noise pollution.
5. Carbon Emissions • Insufficient mention of carbon emissions from transport. Modelling should be carried out on any new transport infrastructure projects to ensure alignment with net-zero carbon emissions by 2038
6. Biodiversity Net Gain: • Policy should be linked to EN2 in regard to biodiversity net gain targets
Support:
1. Reduction in car use: • Attempts to reduce car use were supported and should feed into planning decisions. • Excessive car use considered to reduce physical activity, social cohesion and play opportunities as well as increase health conditions. • Approach should feed into allocation of school places to cut down distances travelled to reach schools.
2. General Support:

• Policy considered to contain good goals
3. Overall policy approach: • Acknowledge that transport projects should take opportunities to improve outcomes for the environment was also welcomed. • Suggested that policy aims should be an overarching policy in all policies rather than being considered as a separate policy.
4. Great Northern Railway Trail (GNRT): • The GNRT was highlighted as being protected in existing and previous plans, with planning permission being approved of much of the route. • Continued protection of the route between Keighley and Queensbury within the Local Plan was supported.
5. Impact on the environment: • Acknowledgement that growth in transport must not come at a disproportionate expense to the built, natural and historic environment was welcomed. • Considered that transport projects should take opportunities to improve outcomes for the environment was also welcomed.
Comments
1. Reducing CO_2 emissions from transport: • Policy principles were supported and welcomed; however, it did not refer to reducing CO_2 emissions from transport. • Transport emissions, predominately from road transport, were noted as being contributing towards a significant part of the region's emission. • City region's approach was highlighted as being to build green and blue infrastructure into transport schemes that will support biodiversity, whilst minimising transport's contribution to carbon emissions. Should be cross-referenced within the policy.
2. Impact on Kirklees Metropolitan Council area: • Needs to be understand of the effect of the Plan's proposals on the neighbouring Kirklees Council area. • Includes potential impacts on the strategic and local highway networks as well as air quality and links existing and indicative walking/cycling networks. • Seeks to ensure that further engagement will take place to discuss/understand implications of development.

Representation IDs: 2936, 3690, 3833, 5405, 5505, 5935, 15834, 16724, 19867, 28393, 29062, 29628

2.26 POLICY TR3: INTEGRATING SUSTAINABLE TRANSPORT AND DEVELOPMENT

Overview

Policy TR3 sets out a sustainable transport framework for all new developments and seeks to strengthen and clarify the integration of sustainable transport and all future development. The sustainable transport framework is complemented by accessibility criteria in Appendix 6 that define the levels of public transport accessibility needed to support sustainable development across the district; and is also supplemented by Policy TR2.

In total, **159** representations from **158** respondents were submitted in relation to the contents of Policy TR3. These were received from Town/Parish Councils, local residents, a resident's association, a cycling campaign group, a local/sub-regional environmental organisation, landowners, agents/planning consultants, Government agencies/bodies (Highways England), a sub-regional body (West Yorkshire Combined Authority), a footpath development group (Great Northern Railway Trail Development Group) and a neighbouring local authority.

Table 2.26.1: Queston 24 - Policy TR3: Integrating Sustainable Transport and Development – Summary of Representations Received

Consultation Question 24 - Policy TR3: Integrating Sustainable Transport and Development				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
159	**158**	**149**	**5**	**5**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Integration of sustainable transport • Green Belt development in South East Bradford: • Level of bus service provision • Transport hierarchy • Site allocations and accessibility threshold • Healthy streets and 15 Minute Neighbourhood principles • General support • Support Alignment with transport evidence base.	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy TR2: Integrating Sustainable Transport and Development in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Support for policy aspirations • Great Northern Railway Trail • comments on promoting bus use and incentivising active travel. • comments on integration of sustainable transport • comments inclusion of urban design policies • Delivery of the West Yorkshire Transport Strategy (WYTS) • Impact on air quality in the Kirklees Council area • Walking and cycling improvements in South East Bradford and implications for the Kirklees Council area	

Summary of Representations
Objections:
1. Integration of sustainable transport: • Strengthening the integration of sustainable transport into new developments was considered essential to delivering the Local Plan. • Concern that applying the definition set out in the Plan of "unsustainable development" would be an issue in Burley in Wharfedale and elsewhere. • Considered to be a disconnect between the Plan's priorities in the context of its wider sustainability objectives.
2. Green Belt development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building. • Council does not care about the environment and animals that need it.
3. Levels of bus service provision: • Firmer stance needs to be taken into relation to bus service provision. • Existing provision was considered unattractive due to issues with timetabling, lack of integrated ticketing, cost and quality of services (unreliable and slow).

- Buses could be more reliable, integrated and environmentally friendly, playing a part in enhancing communities as well as contributing to clean air and the environment.
- Considered that services should be brought under public control by WYCA, allowing good integration with rail and other services.

4. Transport hierarchy:

- Concept of a hierarchy development favouring zero car development over unsustainable development was supported.
- Policy did not refer to such a hierarchy and how it would be implemented.
- Draft wording was considered "open-ended" making it difficult to evaluate and rank proposals.
- Suggested that developers should be required to demonstrate how they chosen to prioritise cycling/walking and public transport over car use.
- LTN principles should be the default expectation.
- Site allocation pro-formas do refer to this approach and do not include a heading on active travel.
- Development of sites SH4/H, SH5/H and SH6/H would be contradictory as they have very poor active travel connectivity, limited public transport options and no local amenities that are easily access on foot or by cycling.

5. Site allocations and accessibility threshold:

- Noted that the council seeks to allocate sites that meet distance thresholds to public transport and other key services.
- Considered that the 800 metres/10 minutes' walk time applied to local services should also be applied to bus stops with regular services to town/city centres.
- Active travel should be considered when considering site allocation, and should include the provision of LTNs

6. Healthy streets and 15 Minute Neighbourhood principles:

- Requirement for applicants being expected to adhere to such principles was queried in terms of what it meant in practice and how it would be interpreted in decision making.
- Suggested that the wording should be amended to support these principles rather than expecting an adherence to them as they were considered to be beyond the influence of applicants.
- Policy wording should be amended to read "*Developments that adhere or contribute to Healthy Streets and 15 Minute Neighbourhood Principles will be supported*".

Support:

1. General Support:

- Policy was supported but did not seem to have been taken into account in allocation of housing sites, for example those at Heights Lane, Eldwick.

• Policy was supported, but concern expressed that it would not be possible address issues experience in Wharfedale.
2. Alignment with transport evidence base: • Policy aspirations were supported; however, it was considered they should be aligned with and supported by a robust transport evidence base.
3. Delivery of policy aspirations: • Policy aspirations were supported; however, it was considered that it would depend on planners understanding sustainable development to change developer attitudes.
4. Great Northern Railway Trail: • Trail highlighted as being protected in previous Local Plans and benefitting from planning permission. Continued protection of the route was supported. • Wider policy of requiring new development to encourage walking and cycling by connecting to existing networks was supported.
Comments
1. Promoting bus use and incentivising active travel: • Promotion/incentivisation of public transport and active travel modes should be a policy focus.
2. Integration of sustainable transport: • Strengthening the integration of sustainable transport into new developments was considered essential to delivering the Local Plan. • Concern that applying the definition set out in the Plan of “unsustainable development” would be an issue in Burley in Wharfedale and elsewhere. • Considered to be a disconnect between the Plan’s priorities in the context of its wider sustainability objectives.
3. Inclusion of urban design policies: • Inclusion of urban design policies was supported, whilst the ambition to improve quality in housing and neighbourhood design was also welcomed. • Noted that the district high population of children and young people was reflected in the Plan’s policies prioritising green space, doorstep play and safe routes to play spaces. • Suggested that policy could be strengthened by including welcoming and safe routes to schools as a requirement.
4. Delivery of the West Yorkshire Transport Strategy (WYTS): • Highlighted that WYTS includes target for increase the number of trips made by sustainable transport modes and reduce those made by car.

• Encouraged that the policy provides a clear steer to help deliver the WYTS objectives by making best use of public transport and considering future transport investment proposals.
5. Impact on air quality in the Kirklees Council area: • Authority is keen to understand air quality implications of the Plan's proposals on the Kirklees highway network. • Air Quality Management Area in Birkenshaw should be considered when assessing air quality implications of development.
6. Walking and cycling improvements in South East Bradford and implications for the Kirklees Council area: • Improving walking and cycling in South East Bradford, was supported in particular where they link to Local Cycling and Walking Infrastructure Plan. • Proposals would be supported where they could facilitate links the existing/indicative Core Walking and Cycling networks set out in the Kirklees Local Plan.

Representation IDs: 1916, 3691, 3836, 4283, 5411, 5513, 5936, 6487, 10958, 11409, 15408, 15825, 15836, 16725, 17295, 18392, 21808, 21891, 21920, 21949, 21978, 22007, 22036, 22068, 22097, 22126, 22155, 22195, 22224, 22253, 22282, 22311, 22340, 22369, 22480, 22509, 22538, 22567, 22605, 22634, 22663, 22692, 22721, 22750, 22794, 22823, 22861, 22890, 22919, 22948, 22977, 23006, 23035, 23064, 23120, 23149, 23178, 23207, 23236, 23265, 23294, 23323, 23352, 23381, 23410, 23439, 23614, 24126, 24170, 24209, 24322, 24351, 24380, 24409, 24440, 24469, 24554, 24583, 24632, 24707, 24745, 24774, 24852, 24939, 24968, 24997, 25027, 25057, 25091, 25142, 25196, 25225, 25437, 25486, 25715, 25744, 25773, 25802, 25831, 25860, 25889, 25918, 25947, 25976, 26005, 26034, 26063, 26092, 26121, 26150, 26179, 26208, 26237, 26266, 26296, 26331, 26360, 26573, 26688, 26720, 26763, 26806, 26835, 26864, 26893, 26922, 26953, 26982, 27014, 27043, 27072, 27125, 27154, 27183, 27212, 27241, 27273, 27302, 27331, 27360, 27389, 27418, 27447, 27569, 27694, 27728, 27801, 27832, 27896, 28195, 28285, 28392, 29218, 29571, 29611, 29639, 30010, 30091, 30174

2.27 POLICY TR4: TRANSPORT AND TOURISM

Overview

Policy TR4 sets out how tourism and leisure needs to be accommodated and promoted in a sustainable manner and how the impact of transportation on cultural, historical and environmental heritage is mitigated. A key aspect of the policy is to encourage new leisure and tourist attractions should be suitably located wherever possible to enable as many visitors as possible to arrive by sustainable transport modes.

In total, **7** representations from **7** respondents were submitted in relation to the contents of Policy TR4. These were received from local residents, an elected member, Town/Parish Councils, a path development group (Great Northern Railway Trail Development Group) and a government agency/body (Historic England).

Table 2.27.1: Question 25 - Policy TR4: Transport and Tourism - Summary of Representations Received

Consultation Question 25 - Policy TR4: Transport and Tourism				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
7	**7**	**2**	**4**	**1**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Level of parking charges • General objection to local Plan • General support • Support for Great Northern Railway Trail • Impact on heritage and cultural assets • Access to the countryside and public transport	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of a revised Policy EC4: Sustainable Tourism and the Visitor Economy in the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections:

1. **Level of parking charges**
   - Current parking charges are too high and will discourage tourism.
2. General objection to the Local Plan (not specific to this policy)

Support:

1. **General Support**:
   - Policy was considered to contain a number of good ideals.

2. **Great Northern Railway Trail:**
   - Trail was highlighted as a being located within a tourism hotspot relating to the Brontes and railway heritage.
   - Noted that the trail links Haworth and Thornton, both of which have strong connections with the Brontes.
   - Progression of the route would ensure Haworth is connected, providing an opportunity for active travel.
   - Trail also complements the area's railway heritage – using a former railway line and complementing the Keighley & Worth Valley Railway.
   - Trail highlighted as being protected in previous Local Plans and benefitting from planning permission. Continued protection of the route was supported.

3. **Impact on heritage and cultural assets:**
   - Policy was supported as it seeks to improve access to main tourist destinations by sustainable transport modes.
   - Intention that planning and development decisions as well as transport policies supported sustainable access to tourist destinations, heritage and cultural assets and leisure was welcomed.
   - Ensuring that areas of cultural and heritage significance should not be adversely by the impact of transport, in particular additional trips arising from development, was supported.

Comments

1. **Access to the countryside and public transport:**
   - Policy including leisure as an objective was considered laudable.

- Highlighted that the countryside was one of the district's main assets. Having bus (and train) access it would be advantageous in improving access.
- Suggested that there should be cross-ticketing between bus operators to improve access to the countryside. Also identifying destinations as countryside access sites would assist.

Representation IDs: 2765, 3692, 5412, 9812, 17296, 28394, 29063

2.28 POLICY TR5: PARKING

Overview

Policy TR5 sets out how the Council will manage car parking through planning and development decisions and transport policies to manage travel demand, and how support will be given to the use of sustainable modes of transport, heighten the quality of place and improve accessibility for all, including those with a disability.

In total, **12** representations from **12** respondents were submitted in relation to the contents of Policy TR5. These were received from local residents, a local political party branch, a landowner, agents/planning consultants, Government agencies/bodies (Highways England, Historic England), a sub-regional body (West Yorkshire Combined Authority) and a climate action group.

Table 2.28.1: Question 26 - Policy TR5: Parking - Summary of Representations Received

Consultation Question 26 - Policy TR5: Parking				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
12	**12**	**4**	**5**	**3**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Parking provision in smaller town centres • Parking at stations • Parking Standards • Policy Additions Impact on designated heritage assets • General objection to Local Plan • Enhancing public transport and reduction in car use • General support • Support for inclusion of parking policy • Support for use of parking standards	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy TR3: Parking in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Support impact on strategic road network. • Comments on transport strategy • Comments on parking policy • Accessibility criteria comments • Comments on parking standards	

Summary of Representations
Objections:
1. Parking provision in smaller town centres: • Concerns expressed regarding the reduction of long-term parking in smaller town centres. • Public transport within such settlements is poor, meaning people would drive to their destination or go to where they can use more regular public transport services to park. • Would result in on-street parking due to reluctance to pay parking charges. • Suggested that car parks should be free of charge and made long stay to reduce traffic and on-street parking.
2. Parking at stations • Suggested that parking provision at railway stations needed to be reviewed with relevant authorities.
3. Parking Standards • Objection to the definition of "unsustainable development" in relation to certain types of parking within new development. • Concern~~s~~ that lower levels of parking provided by applying the proposed standards in new developments will result in "on-street" and "inconsiderate" parking. • Should be carefully considered at the planning application stage in the context of the development being proposed.
4. Policy Additions Impact on designated heritage assets: • Objection to policy wording by Historic England as it has highlighted that the design, layout and proximity of parking facilities has potential to harm the significance of heritage assets and their settings. • Requested to change that the policy to acknowledge this point. Criterion B, d, be amended to read: '*is designed in consideration of the street scene, local character and historic environment*,'
5. General objection to the Local Plan (not specific to this policy)

Support:
1. Enhancing public transport and reduction in car use: • Approach was strongly supported, however using parking provision as a lever did not take into consideration choice and reasons for travelling to destinations. • Choices are influence by lack of available parking and/or because public transport does not provide an adequate solution. • Suggested that effect public transport needed to precede reductions in parking.
2. General Support: • Policy approach was generally supported in its efforts to cover a difficult issue.
3. Use of parking standards: • Support expressed for the use of parking standards. • Changes to parking approach should be supported by improvements to public transport and shared mobility. Would promote greater acceptance.
4. Inclusion of parking policy: • Inclusion of a parking policy was supported, in particular those elements of it aimed at encouraging people to use all transport methods other the private car, where possible. • Unclear whether implementing Parts A and B of the policy would contribute to affecting a transition to sustainable transport. • Suggested that requiring developers to provide routes for cycling and walking to schools and railway stations would be more impactful. • Highlighted people would not leave cars at home until dedicated cycle paths, cheap, frequent and reliable buses, and integration between bus and rail services were put in place, however developments were designed. • Also suggested that developers providing Metro Cards or other travel plan measures would be ineffective until bus services were more frequent and reliable and linked to rail services.
5. Impact on strategic road network: • Policy aspirations were supported and noted that parking provision was driver of modal choice. • Noted that the policy sought to minimise parking in new development as well as managing parking levels below the proposed standards. • Approach would reduce the impact of Plan's aspirations on the Strategic Road Network. • Policy aspirations should be adhered to in new development.
Comments
1. Transport Strategy

	• A transport strategy for Bradford should be developed which provides a list of public transport schemes to be delivered.
2.	**Parking policy:** • Policy of reducing parking in accessible locations was supported as it would help achieve the transition from the car to sustainable transport modes. • Suggested that additional work was required to defined what the Council considered to be “high public transport accessibility”.
3.	**Accessibility criteria:** • Noted that the accessibility criteria within the plan were based on the former Regional Spatial Strategy. • Were considered a useful starting point but could be further refined. Highlighted that the Combined Authority could assist in making them more relevant and measurable. • Suggested that the Combined Authority’s Developer Advice Note should be cross-referenced within the Plan.
4.	**Parking standards:** • Agree that space for car parking should be reduced as an acknowledgement that there were sustainable alternatives to households using one or more cars. • Existing approach of every house being built with space for one or more cars was considered unsustainable. • Suggested that housing development could include car clubs, lockable cycle shelters, communal electric cargo bike schemes etc.

Representation IDs: 1092, 2900, 3158, 3693, 3839, 5413, 10959, 15533, 15837, 18393, 19932, 20695

2.29 POLICY TR6: FREIGHT

Overview

Policy TR6 establishes how the Council will encourage the future movement of goods by the most sustainable means. The policy actively encourages the promotion of rail freight, as it is considered the most sustainable way of moving large quantities of goods and material, as it is best suited to this task, and has minimal external consequences on the environment. New developments are also encouraged to consider the potential for rail sidings, terminals, or light industrial railways for this purpose, and seek ways to remove reliance on road haulage.

In total, **2** representations from **2** respondents were submitted in relation to the contents of Policy TR6. These were received from a local resident and a landowner (and their agent/planning consultant).

Table 2.29.1: Question 27 - Policy TR6: Freight - Summary of Representations Received

Consultation Question 27 - Policy TR6: Freight				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
2	**2**	**1**	**1**	**0**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Loal distinctiveness • General support	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy TR5: Freight & Logistics in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Local distinctiveness:

• Policy is not specific enough to Bradford as it references intermodal freight facilities and freight being handled at Leeds Bradford airport.
Support:
1. General support: • The policy was generally supported and considered to set out a series of good goals.
Comments
No representations received commenting on the policy

Representation IDs: 5416, 18073

2.30 POLICY TR7: AIRCRAFT SAFETY

Overview

Policy TR7 seeks to ensure the safe operation and movement of aircraft within Bradford District and address the impact that development that have on the safeguarding areas for Leeds Bradford International Airport and the Hameldon Hill technical area between Accrington and Burnley, together with the emergency helicopter land sites at Bradford Royal Infirmary and Airedale General Hospital.

In total, **1** representation from **1** respondent was submitted in relation to the contents of Policy TR7. This was received from a local resident.

Table 2.30.1: Question 28 - Policy TR7: Aircraft Safety - Summary of Representations Received

Consultation Question 28 - Policy TR7: Aircraft Safety				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
1	**1**	**0**	**1**	**0**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • General support	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy TR5: Freight & Logistics in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
No representations received in objection to the policy
Support:
1. General support:

• Policy was considered to be “OK”.
Comments
No representations received commenting on the policy.

Representation ID: 5421

2.31 POLICY HO1: HOUSING DELIVERY, STRATEGIC SITES AND MANAGING GROWTH

Overview

Policy HO1 outlines how the Council will support housing delivery, its approach to strategic sites and small sites and the need for managed housing delivery coordinated with service and infrastructure provision.

In total, **171** representations from **170** respondents were submitted in relation to the contents of Policy HO1. These were received from local residents, Town/Parish Councils, developers, landowners, agents/planning consultants, a resident's association/group, a development industry representative, a national heritage organisation (The National Trust) and a government agency/body (Historic England).

Table 2.31.1: Question 29 - Policy HO1: Housing Delivery, Strategic Sites and Managing Growth - Summary of Representations Received

Consultation Question 29 – Policy HO1: Housing Delivery, Strategic Sites and Managing Growth

Number of Representations	Number of Respondents	Object	Support	Comment
171	170	163	3	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Table discrepancy • Minimum housing need • Caveat A • Caveat E • Green Belt • 35% uplift • General comment • General support • Support collaboration	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy HO1: Housing Delivery in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Support phasing/caveat E. • General comments • Infrastructure	

Summary of Representations
Objections:
1. Table 4.14.1 • There is a discrepancy between table 4.14.1 and the sites identified in the proformas. Also, none of these sites is scheduled to start before 2027 despite them being close to employment centres. • Large sites seem to be concentrated to ensure quick wins. • Queensbury Golf course should be included in the list as a strategic site together with QB4/H and QB5/H
2. Minimum housing need • The policy should state that the proposed housing requirement is the minimum need
3. Caveat A • Greenfield sites are the Councils objective
4. Caveat E • There is no requirement in the NPPF to control land release over the plan period and would stifle sustainable sites in the local growth areas and principal towns and would compromise the delivery of the housing requirement. Only strategically important sites should be phased. • Bradford has suffered from long standing undersupply/delivery, and a phasing policy is not necessary. • Delete caveat E- sites which have been identified for development should be available from adoption of the Plan
5. Green Belt • Bradford Council have been undemocratic in their wish to “pour cement” over Tong
6. 35% uplift • The Council should explore other options for the delivery of the 35%
7. General comment • A table should be inserted which lists all the sites to be allocated, their size and proposed capacity.

- Additional sites should be allocated to act as a buffer against under delivery

Support:

1. Working in collaboration

- The commitment to work with a range of groups and work with community led initiatives is welcomed

2. General

- General support for the policy

3. Phasing/caveat E

- Welcome reference that the allocated supply will be managed so as not to undermine regeneration

Comments

1. General

- A table could be inserted which lists all the sites to be allocated, their size and proposed capacity.
- The HBF can provide advice on housing delivery issues and will work proactively with the Council.
- The Council should allocate more sites to maintain a buffer against under delivery.
- The delivery of sites should be realistic and based on knowledge and historic data.
- General agreement that the policy which will assist in facilitating development at the earliest opportunity and address the Councils current inability to demonstrate a 5-year supply.
- Agreement that there should be prioritisation for large sites

2. Paragraph 4.14.11

- Concern that existing infrastructure will not be able to cope with too much development at once. Assurances are needed to prevent development until infrastructure is available

Representation IDs: 1722, 1917, 3384, 3694, 4176, 5433, 5446, 10961, 11029, 11410, 16269, 16966, 17423, 17653, 17689, 18394, 18923, 18933, 18943, 18953, 21809, 21892, 21921, 21950, 21979, 22008, 22037, 22069, 22098, 22127, 22156, 22196, 22225, 22254, 22283, 22312, 22341, 22370, 22481, 22510, 22539, 22568, 22606, 22635, 22664, 22693, 22722, 22751, 22795, 22824, 22862, 22891, 22920, 22949, 22978, 23007, 23036, 23065, 23121, 23150, 23179, 23208, 23237, 23266, 23295, 23324, 23353, 23382, 23411, 23440, 23615, 24127, 24171, 24210, 24323, 24352, 24381, 24410, 24441, 24470, 24555, 24584, 24605, 24633, 24708, 24746, 24775, 24853, 24940, 24969, 24998, 25028, 25058, 25092, 25143, 25162, 25163, 25197, 25226, 25438, 25487, 25504, 25716, 25745, 25774, 25803, 25832, 25861, 25890, 25919, 25948, 25977, 26006, 26035, 26064, 26093, 26122, 26151, 26180, 26209, 26238, 26267, 26297, 26332, 26361, 26574, 26689, 26721, 26764, 26807, 26836, 26865, 26894, 26923, 26954, 26983, 27015, 27044, 27073, 27126, 27155, 27184, 27213, 27242, 27274,

27303, 27332, 27361, 27390, 27419, 27448, 27570, 27695, 27729, 27760, 27802, 27833, 27897, 27916, 28196, 28286, 28997, 29066, 29219, 29572, 29612, 29647, 30011, 30092, 30175, 30290

2.32 POLICY HO2: HOUSING DENSITY

Overview

Policy HO2 sets out the density expectations on developers of housing sites. The consultation question asked whether the approach put forward by the Council was appropriate.

In total, **168** representations were received from **168** respondents in relation to the contents of Policy HO2. These were received from Town/Parish Councils, local residents, a local environmental group/organisation, landowners, developers, agents/planning consultants, a climate action group, a development industry representative, a Member of Parliament and a Government agency/body (Historic England).

Table 2.32.1: Question 30 - Policy HO2: Housing Density - Summary of Representations Received

Consultation Question 30 - Policy HO2: Housing Density

Number of Representations	Number of Respondents	Object	Support	Comment
168	**168**	**151**	**10**	**7**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Minimum density is too low. • Minimum density is too high. • Other objections • General support • Increase from 35 to 50 units per ha. • Further amendments • General comments	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy HO2: Housing Density in the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections:

1. Minimum density is too low.

- Higher density will help the Council meet its targets without needing Green Belt sites. Densities at 50 can still provide pleasant living environments. Point B should be therefore referred to a minimum density of 50 dwellings.
- A policy of 50 dpha should be adopted for all sites. This will lead to more affordable homes in sustainable locations.
- The policy should require 50dpha at all times. Many of the sites already do not meet the minimum density requirement of 35 dpha. The take up of greenfield sites could be reduced significantly if the density minimum is increased.
- Development density should be further increased to limit the loss of green belt sites particularly in Bradford South

2. Minimum density is too high.

- The requirement to achieve higher densities proposed will be at the expense of design given increased demands for open space and biodiversity standards and put a strain on development proposals

3. Other

- There are sites in the district where high densities would cause considerable harm historic character. The stipulation in criteria A, B and C is welcomed which notes where lower densities would be appropriate, but it could be interpreted that similar circumstances' will not be applied within the city and principal towns. A similar caveat should be applied to criterion D.

Support:

- Support for increase providing green space infrastructure is provided.
- Support for the increase in the minimum density of 35 dpha and increase of more than 50 dpha in sustainable locations such as close to railway stations and the flexibility in the policy which ensures efficient use of land and respect to local character and site-specific issues

Comments

1. Increase from 35 to 50 units per ha.

- Could assist in the delivery of affordable homes. Apartments should be included in the dwelling mix to achieve this and will support Councils Climate Emergency Goals

2. Further amendments

- Revisions could be made to the policy to take account of market aspirations and viability. The Council will also need to consider policies on open space provision, cycle, parking and bin storage and other standards.

4. Other

- If the numbers are critical to meeting targets, then more homes should be built on each site. Examples of low densities referenced of Green Belt sites where densities could be higher.
- Rural areas should be allowed to incorporate smaller developments to maintain the rural authenticity protect heritage.

Representation IDs: 1918, 3047, 3695, 3840, 5453, 5938, 11411, 16270, 16727, 16967, 17451, 17654, 18387, 19930, 21810, 21893, 21922, 21951, 21980, 22009, 22038, 22070, 22099, 22128, 22157, 22197, 22226, 22255, 22284, 22313, 22342, 22371, 22482, 22511, 22540, 22569, 22607, 22636, 22665, 22694, 22723, 22752, 22796, 22825, 22863, 22892, 22921, 22950, 22979, 23008, 23037, 23066, 23122, 23151, 23180, 23209, 23238, 23267, 23296, 23325, 23354, 23383, 23412, 23441, 23616, 24128, 24172, 24211, 24324, 24353, 24382, 24411, 24442, 24471, 24556, 24585, 24606, 24634, 24709, 24747, 24776, 24854, 24941, 24970, 24999, 25029, 25059, 25093, 25144, 25164, 25198, 25227, 25439, 25488, 25505, 25717, 25746, 25775, 25804, 25833, 25862, 25891, 25920, 25949, 25978, 26007, 26036, 26065, 26094, 26123, 26152, 26181, 26210, 26239, 26268, 26298, 26333, 26362, 26575, 26690, 26722, 26765, 26808, 26837, 26866, 26895, 26924, 26955, 26984, 27016, 27045, 27074, 27127, 27156, 27185, 27214, 27243, 27275, 27304, 27333, 27362, 27391, 27420, 27449, 27571, 27696, 27730, 27761, 27803, 27834, 27898, 27917, 27961, 28197, 28287, 28524, 28526, 28579, 29069, 29220, 29573, 29613, 29656, 29708, 29776, 30012, 30093, 30176

2.33 POLICY HO3: URBAN HOUSING

Overview

Policy HO3 will aims to ensure that higher density urban housing schemes create sustainable homes and neighbourhoods are high quality and deliver a range of higher density house types, townhouses, contemporary terraces, apartments and flats.

In total, **7** representations from **7** respondents were submitted in relation to the contents of Policy HO3. These were received from local residents, a Town/Parish Council, developers, agents/planning consultants, and Government body/agency (Historic England).

Table 2.33.1: Question 31 - Policy HO3: Urban Housing - Summary of Representations

Consultation Question 31 – Policy HO3: Urban Housing				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
7	**7**	**3**	**4**	**0**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Design • Higher density • Status of centres • Support on higher Density and Transport Links	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy HO2: Housing Density in the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Proposed development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building.
2. Design • Council to ensure urban housing schemes in urban areas are high quality and of an appropriate design.
3. Higher Density • Policy should not be limited to City, Town and District Centres. High density schemes could be developed in local centres if there is appropriate infrastructure to support it. Policy needs further clarity.
4. Design • Council to ensure urban housing schemes in urban areas are high quality and of an appropriate design.
Support:
1. Status of Centres • General support for policy but further clarity required. Unclear whether the reference to District Centres could be considered to include some Local Service Centres and Local Growth Centres or whether District Centres are purely within the urban city boundaries.
2. Higher Density and Transport Links • The policy supports the delivery of high-quality, higher density schemes in urban locations and on sites close to public transport facilities. The policy recognises the sustainability of sites located near to transport services.
Comments
None

Representation IDs: 1723, 3281, 3696, 16968, 17655, 17690, 29070

2.34 POLICY HO4: HOUSING MIX

Overview

Policy HO4 will seeks to ensure that new residential development provides for a range of housing types, in line with the revised NPPF. It is considered appropriate to maintain a flexible policy approach to housing mix on a site-by-site basis informed by latest evidence in the SHMA and other local evidence of need and demand. The preferred option removes previous policy criteria supporting custom and self-build housing specialist housing as these are covered by new standalone policies in the Local Plan.

In total, **20** representations from **20** respondents were submitted in relation to the contents of Policy HO4. These were received from local residents, Town/Parish Councils, a resident's association, developers, agents/planning consultants and a development industry representative.

Consultation Question 32 – Policy HO4: Housing Mix

Number of Representations	Number of Respondents	Object	Support	Comment
20	**20**	**8**	**5**	**7**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Design • Types of housing • Viability • General support • Policy amendment • Brownfield sites • Light pollution • Flexibility Older People's Housing • Housing Mix	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy HO3: Housing Mix in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Proposed development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building
2. Design • Mix of housing needs to be further enforced. Bradford Council must take a stronger line on the look and design of housing developments. • Stop enabling developers to build lots of detached houses all too close to each other and too big for their plots.
3. Types of housing • Third bullet point under D of the policy states that larger homes are needed across the district whereas it should say 'a suitable housing mix is needed across the district with particular emphasis on increasing the supply of 2- and 3-bedroom homes district-wide.
4. Viability • Recommended that a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market.
Support
1. General Support • Agree that family housing and affordable housing will play an important part in providing for Bradford's existing and future housing needs. • The Council's approach to the strategic allocation of sites and ensuring efficient use of land through appropriate density and mix of development is supported.
2. Policy Amendment

- Part C of the Policy states that specific guidance on housing mix on an area or site basis will be set out as necessary in site allocation proformas and Neighbourhood Plans. This approach results in uncertainty for developers and contradicts with part B of the policy which provides flexibility on mix, supported by evidence.
- Required Change - Part C of the Policy should provide clarity that any guidance on housing mix will support a flexible approach towards housing as outlined in Part B of the policy.

Comments

1. Brownfield Sites

- Some Brownfield sites have great value and shouldn't all be regarded as having the same value.

2. Light Pollution

- No mention of light pollution and its impact.

3. Flexibility

- Part C suggests setting additional guidance which, in practice, may end up being used in an inflexible way during planning applications, when local circumstances, and changing customer and market needs may require some deviation from the more prescriptive guidance likely to be provided.
- Recommended that a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market.

4. Older People's Housing

- Need more accommodation for the elderly and this will subsequently release more family homes.

5. Housing Mix

- Smaller eco-build houses should be built to allow young people starter homes. Larger executive homes just add more pressure to infrastructure.
- Surveys have demonstrated the need for smaller suitable housing units for starter homes and equally for older people wishing to downsize and release larger houses for families in middle years. There was not demand within the town's residents for yet more 4- or 5-bedroom houses of the type most profitable to develop.
- Believe that a different mix of housing needs will become clearer as the country emerges from the changes arising from significant events.

Representation IDs: 3283, 3697 ,4269 ,5582, 7140, 10330, 10962, 16969, 17656, 17691, 18164, 18388, 18395, 25165, 27918, 27962, 28527, 28578, 29045, 29709

2.35 POLICY HO5: AFFORDABLE HOUSING

Overview

Policy HO5 will aim to ensure that a sufficient supply of good quality affordable housing is delivered to meet identified affordable housing needs in the district. The Policy will support the Local Plan's strategic objectives.

In total, **162** representations from **161** respondents were submitted in relation to the contents of Policy HO5. These were received from Town/Parish Councils, local residents, developers, landowners, agents/planning consultants, a sub-regional body (West Yorkshire Combined Authority), a climate action group and a development industry representative.

Table 2.35.1: Question 33 - Policy HO5: Affordable Housing - Summary of Representations Received

Consultation Question 33 - Policy HO5: Affordable Housing

Number of Representations	Number of Respondents	Object	Support	Comment
162	**161**	**154**	**3**	**5**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Evidence • Developer contributions • Clarity • Proposed development in SE Bradford • Local Residents Housing • Housing Mix • Policy amendment • Housing supply • Affordability • Housing requirement • Barriers to development	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy HO5: Affordable Housing in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• S106 • General support • Flexibility • Density • Comments on flexibility, density, viability, concerns, targets, housing delivery, viability, local provision, clarity	

Summary of Representations
Objections:
1. Evidence • Concerns about approach of affordable housing policy. Evidence has not been taken into consideration. Issues affecting credibility of figures in Zones 3 and 4. Targets used in HO5 issues affecting credibility of figures in Zones 3 and 4.
2. Developer Contributions • Issues with developer contributions being allowed instead of physically delivering affordable housing. Needs justification.
3. Clarity • In Policy HO5 E third bullet appears to an interpretation of para 64 of the NPPF but it is unclear and omits the reference to "specific groups".
4. Proposed development in SE Bradford • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building.
5. Evidence • Concerns at approach adopted in respect of affordable housing policy. More evidence to be put into this policy. • Agree in principle to the figures for Zones 1 & 2. • Zones 3 & 4 lack credibility based on evidence – most homes in zones 3 & 4 are rented and are amongst the most deprived in the UK, whilst the SHMA states that 25% of the district's housing need is for affordable homes.
6. Local Resident's Housing • Not documented that ring-fencing of affordable housing for local residents; say 10%, yet this is an aim of the Local Plan.
7. Housing Mix

- Policy states the proposed mix is the starting point for negotiations, proposed mix too prescriptive. Government drive to increase home ownership. The bullet points in part E of Policy HO5 should be removed so that tenure mixes are considered on a site-by-site basis having regard to the SHMA or other up to date verifiable evidence.

8. Policy Amendment

- Part E of the draft Policy incorrectly reflects national planning policy and needs to be corrected. Bullet point 3 under part E of the draft Policy suggests that this 10% is the proportion of the overall affordable housing contribution that should be available for affordable home ownership, which is incorrect.

9. Housing Supply

- Policy SP8 will compromise ability to meet policy HO5. Scale of affordable housing justifies an uplift in overall housing figure. Restriction of housing in high market value areas will increase affordability gap.

10. Affordability

- Affordable housing should be prioritised in areas with lower house prices for those most in need of affordable housing not in higher market value areas.

11. Housing Requirement

- Policy expects at least 10% of homes from affordable ownership, does not direct that alternative targets should be proposed for greenfield and brownfield land, as such, a single figure should be proposed for each of the suggested areas, so for Zones 3 and 4, a single figure of 10% should be adopted.

12. Barriers to development

- The adopted Core Strategy figure, requires extensive greenfield and Green Belt development to ensure its achievement, additional barriers, such as an increased affordable housing target, should not be imposed to reduce or potentially prevent the chances of this essential housing being expediently delivered within the new Local Plan.

13. S106

- Section 106 agreements for affordable housing will still include a caveat allowing developers and builders to make affordability payments in lieu of housing to council.

Support

1. General Support

- Agreement with Queensbury affordable housing targets
- It is a strategic priority to deliver more family homes across the district including sufficient affordable housing

2. Flexibility

- Consider parts of the policy dealing with vacant building credits, tenure, and rural housing are appropriate and flexible to allow for alternative approaches to be taken towards the delivery of affordable housing.

3. Density • Council's approach to the strategic allocation of sites and ensuring efficient use of land through appropriate density and mix of development is supported.
Comments
1. Flexibility • Concerns over Part E of the policy. It is too prescriptive. Needs more flexibility. Part E to be amended to remove starting point in favour to current SHMA. Approach would better accord with national policy. This would recognise drive to increase home ownership would be more flexible and not exclude high proportion of affordable rentals should they be justified.
2. General Support • Policy sets varying degrees of affordable housing contribution for all major residential developments (10 or more homes) across four 'Affordable Housing Zones' and dependent upon greenfield/brownfield status, above the identified size thresholds. These elements of the Plan support the Strategic Economic partnership (SEP)ambition to increase housing growth and the provision of affordable homes.
3. Density • Developments should include a significant proportion of affordable housing and meet requirements for density to accommodate these.
4. Viability • Viability issues in lower and medium value zones. Need to clarify what interventions council will take in market to support delivery.
5. Concerns • Concerns council has misinterpreted 10%affordable homes. This should be 10% affordable homes as a proportion of overall number of homes not from affordable housing contribution. If council following viability recommendations, then only affordable homes should be built in lower market areas.
6. Targets • Council should give further consideration to NPPF requirement to the tenure split proposed across areas. It would not be possible to provide both the NPPF 10% affordable home ownership homes and meet the proposed affordable housing split set in the policy.
7. Housing Delivery • Unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.

8. Viability • Affordable housing policies must not only take account of need but also viability and deliverability.
9. Local Provision • Within the Preferred Option no affordable housing will be provided in East Morton.
10. Clarity • Policy recommends a zero requirement for lower value zones but highlights it may be possible to set a level of 10% and consider proactive interventions to support delivery. Not clear what interventions are proposed.

Representation IDs: 1919, 3284, 3698, 5460, 10332, 10963, 11415, 15776, 16970, 17657, 17692, 18389, 18396, 19931, 20000, 21811, 21894, 21923, 21952, 21981, 22010, 22039, 22071, 22100, 22129, 22158, 22198, 22227, 22256, 22285, 22314, 22343, 22372, 22483, 22512, 22541, 22570, 22608, 22637, 22666, 22695, 22724, 22753, 22797, 22826, 22864, 22893, 22922, 22951, 22980, 23009, 23038, 23067, 23123, 23152, 23181, 23210, 23239, 23268, 23297, 23326, 23355, 23384, 23413, 23442, 23617, 24129, 24173, 24212, 24325, 24354, 24383, 24412, 24443, 24472, 24557, 24586, 24635, 24710, 24748, 24777, 24855, 24942, 24971, 25000, 25030, 25060, 25094, 25113, 25145, 25166, 25199, 25228, 25440, 25489, 25718, 25747, 25776, 25805, 25834, 25863, 25892, 25921, 25950, 25979, 26008, 26037, 26066, 26095, 26124, 26153, 26182, 26211, 26240, 26269, 26299, 26334, 26363, 26576, 26691, 26723, 26766, 26809, 26838, 26867, 26896, 26925, 26956, 26985, 27017, 27046, 27075, 27128, 27157, 27186, 27215, 27244, 27276, 27305, 27334, 27363, 27392, 27421, 27450, 27572, 27697, 27731, 27765, 27804, 27835, 27899, 27919, 28198, 28288, 29026, 29221, 29574, 29614, 30013, 30094, 30144, 30177

2.36 POLICY HO6: SELF BUILD AND CUSTOM BUILD HOUSING

Overview

Policy HO6 aims to generate land for Self-Build and Custom Housebuilding (SBCH) plots throughout the district during the period of the plan The Policy includes requirements to encourage the provision of serviced plots being made available from medium and large housing sites and promoted on the open market for individuals and groups to use for the development of SBCB housing units. The Policy also encourages the use of Council owned land and smaller sites to be developed for SBCB units.

In total, **8** representations from **8** respondents were submitted in relation to the contents of Policy HO6. These were received from local residents, developers, agents/planning consultants and a development industry representative.

Table 2.36.1: Question 34 - Policy HO6: Self Build and Custom Build Housing - Summary of Representations Received

Consultation Question 34 - Policy HO6: Self Build & Custom Build Housing				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
8	**8**	**6**	**0**	**2**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Community led hosing. • 5% Policy from Sites providing 100+ units. • Proposed development in South East Bradford: • Planning for Self-Build and Custom Build	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy HO5: Self-Build & Custom Build Housing in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections:

1. Community Led Housing

- The policy should incorporate the provision of Community Led Housing and not be limited to Self and Custom build. A Community Land Trust (CLT) may be established to provide affordable housing that meets the needs of the local community, but the members of the CLT would not necessarily be residents of the scheme.

2. 5% Policy from Sites providing 100+ units:

- Objection to the blanket obligation for larger, strategic sites of over 100 homes to deliver 5% self-build plots.
- Requirement is arbitrary and unjustified; the Council should provide appropriate evidence to support the obligation to support the requirement for 5% of the total plots on developments of over 100 dwellings to provide service plots for custom or self-build housing.
- The Council's approach is restrictive rather than permissive by requiring the inclusion of such housing on developments of over 100 dwellings.
- The policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes.
- It is recommended appropriate evidence is collated to ensure that house building delivery from this source provides an additional contribution to boosting housing supply. This is likely to include engaging with landowners and working with custom build developers to maximise opportunities.
- The SHMA (2019) highlights that 1,175 people were registered on the Council's self-build register, it provides no analysis or evaluation of this figure and does not provide any other evidence or information.
- Delivering self-build plots from larger sites would be impractical for a volume housebuilder for a number of reasons.
- The requirement of 5% of self-build plots should only apply to larger scale, strategic sites of 400+ units.

3. Proposed development in South East Bradford:

- Single objection raised in relation to this Policy did not contain any specific objection points regarding specialist housing and accommodation.
- The objection raised issues which included urban expansion and building houses and roads in the Green Belt specifically in the area of Tong and that a proposed development would directly affect a Grade II listed house.

Support:

No representations in support were received.

Comments:
1. Planning for Self-Build and Custom Build • The Home Builders Federation (HBF) are not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. • The policy support afforded to self-build and custom housebuilding in national planning policy is recognised. • Provision for self-build opportunities are likely to be better supported on smaller sites, incorporating windfall opportunities and/or Council owned land where such opportunities can be more easily incorporated. • Plots for custom and self-build housing sites would go some way to making more varied housing development. Should these be made available at a reasonable price to eco-self-builders it could be a new approach to mixed housing development.

Representation IDs: 1725, 3699, 10964, 18397, 25167, 27766, 27920, 28047

2.37 POLICY HO7: SPECIALIST HOUSING AND ACCOMMODATION

Overview

Policy HO7 seeks to support an increase in the provision of specialist housing schemes such as accommodation older persons and people with disabilities in suitable locations to meet identified need.

In total, **6** representations from **6** respondents were submitted in relation to the contents of Policy HO7. These were received from local residents, developers, agents/planning consultants and a development industry representative.

Consultation Question: 35 - Policy HO7: Specialist Housing and Accommodation

Number of Representations	Number of Respondents	Object	Support	Comment
6	6	2	2	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Viability • General support • Density and mix • Suggested Specialist Housing sites • General support • Older People's Housing • Viability	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy HO6: Supported and Specialist Accommodation in the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Proposed development in South East Bradford:

- Single objection raised in relation to this Policy did not contain any specific objection points regarding specialist housing and accommodation.
- The objection raised issues which included urban expansion and building houses and roads in the Green Belt specifically in the area of Tong and that a proposed development would directly affect a Grade II listed house.

1. Viability

- Building Regulations M4(2) are too onerous. M4(2) is not a mandatory Building Regulations requirement. Suggest a large number of standard property designs would need to be redesigned, and this would substantially impact upon plot size, development density and site viability.
- Questioned whether there is a need to impose such stringent requirements on every residential development. Such design measures should only be implemented when there is robust evidence to justify the need in a particular location.
- Policy should be reduced from 100% of new homes to 25%.
- References to national space standards are set out in policy HO7 are welcomed.

2. General support

- References to national space standards are set out in policy HO7 are welcomed.

Support:

1. General Support

- Support policy and the Council's objective to deliver specialist housing for those in need of care and/or support.

2. Viability

- Part C of the policy requires C3 Use Class extra care provision to provide affordable housing requirements too. Any supporting viability assessment will need to consider the cost differences between standard C3 market housing and extra care housing as the products.

3. Density and Mix

- The Council's approach to the strategic allocation of sites and ensuring efficient use of land through appropriate density and mix of development is supported.

4. Suggested Specialist Housing Sites

- The Queensbury Golf Course site offers the opportunity to deliver extra care units/retirement living. In particular, the part of the site where the existing club house is located is considered to be appropriate given proximity to bus stops and local shops.
- The HMRC Shipley site is a sustainable, suitable and deliverable location for a high-quality residential led development to deliver much needed housing for the district.

Comments:
1. Older People's Housing • More homes to be built for the elderly in urban areas and of higher density. If there are more provision, then elderly residents may move to better suited accommodation releasing existing family sized housing stock.
2. Viability • Where development falls within Use Class C3, affordable housing provision will be required in line with Policy HO5 Affordable Housing. The Council will need to ensure that this requirement is appropriate in terms of viability for these types of developments.

Representation IDs: 3700, 10965, 18165, 18390, 25168, 27776

2.38 POLICY HO8: SITES FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

Overview

Policy HO8 sets out the Council's proposed approach to ensuring a sufficient supply of pitches are delivered to meet the needs of Gypsies, Travellers and Travelling Showpeople in Bradford District, and criteria for allocating sites and determining plan applications.

In total, **6** representations from **6** respondents were submitted in relation to the contents of Policy HO8. These were received from local residents, a local political party branch, an elected member, a government agency/body (Historic England) and a neighbouring local authority.

Table 2.38.1: Question 36 - Policy HO8: Sites for Gypsies, Travellers and Travelling Showpeople - Summary of Representations Received

Consultation Question 39 - Policy HO8: Sites for Gypsies, Travellers and Travelling Showpeople				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
6	**6**	**1**	**3**	**2**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • General objection • Healthy locations • Environment and design • Location • Numbers	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy HO7: Gypsy and Traveller and Travelling Showpersons Accommodation in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
• A single objection raised in relation to this Policy did not contain any specific objection points regarding Sites for Gypsies, Travellers and Travelling Showpeople. The objection raised issues which included urban expansion and building houses and roads in the Green Belt specifically in the area of Tong and that a proposed development will directly affect a Grade II listed house.
Support:
Healthy locations • Raised the concern that Gypsy and Travelling people suffer from very poor health, often related to the stress of finding somewhere to live and the poor quality of provision in terms of location. Requested that adequate attention is given to provide sies which allow healthy living.
Environment and design • Support the requirement that proposals for sites for gypsy and travellers should avoid significant adverse effects upon the environment and incorporate appropriate design and landscaping standards.
Location • Support Policy HO8 whilst raising the issue that the Esholt site for Gypsies and Travellers should be reconsidered in view of its under use.
Comments:
Location • A respondent questioned where these sites would be located.
Numbers • Welcomed the increase (since the CSPR 2019), in proposed number of pitches for Gypsy, Traveller and Travelling Show People supported in the Arc4 commissioned work and discussed with GATE. Would like to make further comment until additional information can be provided following Call for Sites and Duty to Cooperate discussions take place.

Representation IDs: 3180, 3701, 3845, 9813, 29071, 29679

2.39 POLICY HO9: HOUSING STANDARDS

Policy HO9 sets out minimum acceptable standards for internal space standards and optional technical standards for accessible and adaptable housing and criteria to be considered in the design of new residential development.

In total, **26** representations from **24** respondents were submitted in relation to the contents of Policy HO9. These were received from local residents, an elected member, developers, landowners, agents/planning consultants, a climate action group, a development industry representative and Town/Parish Councils.

Table 2.39.1: Question 37 - Policy HO9: Housing Standards - Summary of Representations Received

Consultation Question 37 - Policy HO9: Housing Standards				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
26	**24**	**14**	**0**	**12**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development in South East Bradford • Evidence • Site factors • Flexibility • General support • Accessibility • Viability • Space standards • Housing supply • Transitional period • Planning policy guidance • Housing need and waste	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy HO8: Housing Design Standards in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Private sector housing • Housing standards • Energy efficiency • Flexibility • Accessibility • Affordability • Renewable energy • Green Belt • New Build Housing • Housing Design • Housing Impact • Planning conditions • Challenges	

Summary of Representations
Objections:
1. Development In South East Bradford • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building.
2. Evidence • PPG2 identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. This evidence has not been provided at this stage. • The Council must provide a robust evidence base to justify the introduction of the optional technical standards. • Part C / accessibility standards - the Council to provide a local assessment evidencing the specific case for Bradford which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy.

Summary of Representations
• The requirement at part E/1 of the Policy for all new market and affordable homes to meet the Nationally Described Space Standard (NDSS) for internal space in new dwellings should only be included if the Council can provide appropriate evidence to support this in terms of need, viability and timing as stated in PPG. • Council to provide a local assessment evidencing the specific case for Bradford which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then recommend that an appropriate transition period is included within the policy. • PPG identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space. • standards are identified; local planning authorities should provide justification for requiring internal space policies. • If the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional. • Council has not presented appropriate evidence to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.
3. Site Factors • Consider other site-specific factors, including vulnerability to flooding, site topography and other circumstances.
4. Flexibility • Flexibility needs adding to the policy wording to allow for exemptions to the policy where it may not be possible to achieve the standards due to site-specific matters or viability considerations. • Current increase in people working from home additional rooms may be sought to accommodate home offices. Flexibility is key. It is not considered essential that home offices strictly adhere to the NDSS.
5. General Support • Part C - We generally support the provision of such technical standards further evidence is required to justify the requirement as detailed in the policy. • Support policy aims for new build dwellings to meet Building Regulation requirements M4(2) (accessible & adaptable homes) and for 5% of dwellings on major sites to meet Building Regulations requirement M4(3) (wheelchair user dwellings).
6. Accessibility

Summary of Representations
• There is no evidence to support the proposed threshold of 10 dwellings or 5% in relation to wheelchair user standards. Further information and evidence are required to justify these requirements.
7. Viability • 10 dwellings or 5% in relation to wheelchair user standards. Specific costs associated with meeting these needs which could have viability implications for the delivery of housing. Paragraph 4.22.8 explains that the standards have been assessed as part of the whole plan viability and that site circumstances will be considered if the standards are not viable. The viability of meeting the requirements should be mentioned in the policy**.** • Impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. • Need to consider impacts on affordability where a space standard is to be adopted. • Encourage the use of new and innovative smart waste collection systems including underground bin. • systems where appropriate and feasible, in particular, on larger strategic sites and developments of 500 properties or more or for high density developments. • Concerns about the viability of this policy, it is not clear what the costs for these smart waste collections might be, but it is likely any underground provision would add significantly to the cost of any development.
8. Space Standards • Part E of the policy refers to Nationally Described Space Standards being implemented. Further evidence from the Council is necessary to justify the need for internal space standards. • NDSS as introduced by Government, are intended to be. • optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. • It is essential to recognise that these are optional standards. Footnote 46 of the 2019 NPPF advises that: "Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified."
9. Housing Supply • Requiring NDSS compliant properties for all new dwellings could reduce opportunities for people to access the housing market by removing smaller open market products. This will effectively cut-off a source of supply for many first-time buyers, first-time movers and young families. The reduction in diversity may also harm build rates.

Summary of Representations
10. Transitional period • If the Council can justify the introduction of the NDSS a transitional period should be included within the policy. • A reasonable transitional period following the adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.
11. Planning Policy Guidance • Generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. If the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. • PPG identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. • It identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, this is not just in relation to the ability to provide step free access.
12. Housing Need • Evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, consider any potential impact on meeting demand for starter homes.
13. Waste • Concerns in relation to the waste authority's ability to work with these waste requirements, and whether they will be committed to working with smart solutions for the life of the dwellings, buildings or developments provided.
Support:
No comments on support of this policy.
Comments:
1. Private Sector Housing • Plan does not focus on improvements to private sector housing stock energy conservation for properties in inner city Bradford. Question if need a supplementary document for this.

Summary of Representations
2. Housing Standards • New houses are too small in terms of room size.
3. Energy Efficiency • Are there stipulations around insulation, energy use, quality of gardens etc. Is it time to specify heat pumps or are we too soon?
4. Accessibility • Support the provision of accessible, adaptable and wheelchair user dwellings. The requirement for these types of homes should be applied on a flexible basis and be supported by appropriate evidence of need. • Issues with fencing. Paths should be at least 2 metres wide and accessible from the new housing which is usually not the case.
5. Viability • NPPG advises that planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors. The current policy sets a standard requirement for all housing to be M4(2) and 5% to be M4(3). This would not accord with NPPF guidance on flexibility in plan making, nor could it reasonably be based on a consideration of viability of any particular site, nor any other site-specific factors, given that it is a blanket policy approach. • In some areas in Bradford, (inner city/brownfield sites), the margins between cost of development and likely sale price might be slim, therefore the added costs of building to Passiv House standards (10-15%) might make this uneconomic
6. Flexibility • Policy should be more flexible. Accessible housing should be provided in the locations where there is an identified need, and to avoid making provision in areas which may be less suitable or accessible to some users.
7. Building Standards • Building standards should be adopted to ensure all new build homes meet insulation standards at Passiv House or carbon neutral level.
8. Affordability • If efforts were made to use available grants/subsidies for energy efficient housing, this would mean such housing would remain affordable particularly for first time buyers and those with a limited budget. For more desirable areas there would be less of an issue

Summary of Representations
in a slightly higher asking price for such housing given the lifetime savings on utility bills. If Council introduce such a building standard, it would mark Bradford as an environmentally aware and climate-responsible city and increase its attractiveness.
9. Green Belt • Response to new housing in Ilkley. Need to avoid Green Belt. Appreciate new houses needed due to increase in population.
10. New Build Housing • New housing should incorporate green design, limit impact on the environment and build in the ability for nature to share the space with new inhabitants. - carbon neutral homes designed with environmentally friendly boilers, solar panels - nature friendly so include swift bricks etc. - tree lined streets
11. Energy Efficiency • Implement energy saving measures in your new builds: roof and wall insulation, double glazing, solar panels. • Possibility to use next generation biomass boilers or at least the highest rated efficiency boilers in these new • homes. • A very high standard of insulation, such as Passivhaus. • Heating and cooking systems that rely on electricity rather than fossil fuels. • Renewable power generation, such as via rooftop solar PV, air or ground source heat pumps. • Low energy, high efficiency appliances. • Should new housing be required this must be built with the highest insulation standards to promote energy efficiency and the use of renewable energy to prevent fuel poverty as a priority and avoid the need for retrofitting at a later date.
12. Renewable Energy • Offer some kind of incentive for residents to use 100% renewable energy suppliers to provide gas and electric to their homes?
13. Environment • Install swift bricks. • Installing (communal) compost bins at these sites

Summary of Representations
• Accept some fields will have to go. It would help if a way could be found to create new woodlands and greenspace and paths around and among new houses.
14. Planning Conditions • All new housing should be mandated to be carbon-neutral, or even carbon positive (generating more renewable energy than they consume) as a condition of planning permission.
15. Housing Design • Eco-friendly housing needs to be achieved alongside good and affordable housing. More detail required in the plan on outdoor space as opposed to development packed in together to maximise profit. • Ensure good quality, affordable, eco-friendly, carbon-neutral houses are built. This may cost more in the short term but will save money in the medium to longer term for householders, who may have to retrofit energy efficient heating and hot water systems, windows and insulation. • Need developers to be required rather than requested to build housing of far greater quality including highly insulated/Passivehouse, low energy demand, net zero designs. • Houses which are destined for the town should be developed to a very high design standard, with a mix of housing types to serve the community. This considered approach will achieve a higher density than is currently planned, thus further reducing the amount of green field sites required to meet any agreed housing numbers.
16. Housing Impact • Prior to building more houses more thought and investment is required in order to alleviate some of the impact on both the environment and the community.
17. Challenges • Challenges associated with transitioning to a Net Zero Carbon District however these will only get harder and more costly if the Local Plan is not ambitious in addressing these matters in detail at this stage.

Representation IDs: 3702, 6486, 9814, 10333, 10966, 12372, 16607, 16863, 16971, 17658, 17702, 18166, 18398, 19923, 24607, 25169, 25170, 25171, 27921, 27963, 28037, 28528, 28577, 29710, 29739, 29768

2.40 POLICY HO10: OVERCROWDING AND EMPTY HOMES

Overview

Policy HO10 sets out the council's approach to tacking overcrowding and vacant homes. Overcrowding was identified as one of Bradford's most pressing housing challenges. It also directly contributes to poor health and poor educational attainment and seriously damages quality of life for the families and households affected. Making better use of existing stock i.e. bringing empty homes back into use and reducing under-occupation was also identified as a priority. This reflected key national government priorities.

No representations were submitted in relation to the contents of Policy HO10.

Table 2.40.1: Question 38 - Policy HO10: Overcrowding and Empty Homes - Summary of Representations Received

Consultation Question 38 - Policy HO10: Overcrowding and Empty Homes				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
0	**0**	**0**	**0**	**0**

Headline Summary:	Council's Response:
No representations received to Policy HO10	The Council has reviewed this policy. Revised Policy HO9: Empty Homes and Overcrowding in the Regulation 19 Publication Draft, which has been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
No representations received in relation to this Policy.

2.41 POLICY EN1: GREEN INFRASTRUCTURE STANDARDS

Overview

Policy EN1 examined the potential introduction of Green Infrastructure standards for new development, based on the potential introduction of such standards by Natural England. If included new development would be required to meet these standards in order to ensure good quality, accessible Green Infrastructure is provided. This would help to ensure that the Local Plan meets the NPPF requirements to enable and support healthy lifestyles through the provision of safe and accessible green infrastructure and also to help maintain and enhance habitat and green infrastructure networks.

In total, **157** representations from **157** respondents were submitted in relation to the contents of Policy EN1. These were received from local residents, Town/Parish Councils, local/sub-regional environmental groups/organisations, an elected member, a wildlife trust, a sub-regional body (West Yorkshire Combined Authority), Government agencies/bodies (Environment Agency, Natural England), a developer, an agent/planning consultant and a national heritage body (The National Trust).

Table 2.41.1: Question 39 - Policy EN1: Green Infrastructure Standards - Summary of Representations Received

Consultation Question 39 - Policy EN1: Green Infrastructure Standards				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
157	**157**	**146**	**5**	**6**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Green Infrastructure Standards • Travel networks • Policy / Green Infrastructure / Biodiversity • General support • Green Infrastructure Options • Accessibility • Delivery	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy NE1: Green Infrastructure Standards in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Standards	

Summary of Representations
Objections:
1. Green Infrastructure Standards • Expect to support the Natural England National Green Infrastructure Standards - but need to see the detail. Residents of Burley-in-Wharfedale value green spaces/infrastructure which has been invaluable during the Covid19 pandemic, allowing residents to take exercise in semi-rural/natural settings. Any new development must consider providing good access to green spaces and infrastructure. The broader and more holistic coverage of the Green Infrastructure Standards deserves to be included in a policy.
2. Travel Networks • Further support is required to build the Greenway link between communities.
3. Policy / Green Infrastructure / Biodiversity • All development is required to protect and enhance both biodiversity and green infrastructure features and networks both on and off-site for the lifetime of the development. • Development proposals are required to evidence a thorough understanding of the context of a site and prepare a proportionate assessment of GI, biodiversity and ecological features. • Proposals should demonstrate net gains in biodiversity and show that the mitigation hierarchy has been applied. If significant harm cannot be avoided, development should not be permitted.
Support:
1. General support • General support for the inclusion of a policy on Green Infrastructure Standards. • General support to protect and enhance key green infrastructure corridors.
2. Green Infrastructure Options • New and existing properties would benefit from green walls and living roofs, also street trees and orchards.
3. Accessibility • Important for the standards to take into account walking distance. Example: Bingley is assessed as having a good amount of parks - but most of this is at St Ives and that is at least a 30–45-minute walk for many residents and therefore not accessible.
4. Delivery

- Council should proactively seek to provide Green Space if standards are not met in a particular area of a town.

5. Standards

- Standards should take into account the amount of private gardens.

Comments:

1. Green Infrastructure Options

- Links to bring the countryside into the towns and opening access to rivers and canals to provide ready routes. Opportunities are currently missed in the Worth, Aire and North Beck area.

2. Standards

- Encourage the inclusion of the Building with Nature Standards as a means by which multifunctional green infrastructure should be delivered on sites. The recent trials of the Natural England standards have highlighted the need for incorporating Building with Nature as a mechanism for delivery. The Building with Natural framework is already developed, functional and supported in practice.
- Policy documents can also achieve Building with Nature accreditation.
- Proposed policy for new development to meet national GI standards is likely to support delivery of GI in Bradford district, but there may be a need to development a locally specific policy on the application of those standards to reflect local circumstances. This would provide an opportunity for the policy to set out how it can support other policies on nature recovery and biodiversity net gain.
- The national framework is still being developed. There is potential for further quantified standards to be included alongside the Urban Greening Factor and ANGSt.
- Although not reflected in the Local Infrastructure Plan, the national GI Standards Framework and associated mapping is intended to support the undertaking of assessments such the Open Space Assessment Needs and Demand Assessment.
- This policy anticipates standard from Natural England which not yet been published. It is therefore not possible to test for soundness.
- Support the principle of the policy to improve Green Infrastructure. Policy may need to be revised to ensure consistency with the finalised publication of the standards.

3. Policy

- See comments on Policy SP10

Representation IDs: 309, 1920, 3286, 3703, 3854, 5944, 9815, 11547, 15773, 16728, 19864, 21812, 21895, 21924, 21953, 21982, 22011, 22040, 22072, 22101, 22130, 22159, 22199, 22228, 22257, 22286, 22315, 22344, 22373, 22484, 22513, 22542, 22571, 22609, 22638, 22667, 22696, 22725, 22754, 22798, 22827, 22865, 22894, 22923, 22952, 22981, 23010, 23039, 23068, 23124, 23153, 23182, 23211, 23240, 23269, 23298, 23327, 23356, 23385, 23414, 23443, 23618, 24130, 24174, 24213, 24326, 24355, 24384, 24413, 24444, 24473, 24558, 24587, 24636, 24711, 24749, 24778, 24856, 24943, 24972, 25001, 25031, 25061, 25095, 25146, 25200, 25229, 25441, 25490, 25719, 25748, 25777, 25806,

25835, 25864, 25893, 25922, 25951, 25980, 26009, 26038, 26067, 26096, 26125, 26154, 26183, 26212, 26241, 26270, 26300, 26335, 26364, 26577, 26692, 26724, 26767, 26810, 26839, 26868, 26897, 26926, 26957, 26986, 27018, 27047, 27076, 27129, 27158, 27187, 27216, 27245, 27277, 27306, 27335, 27364, 27393, 27422, 27451, 27573, 27646, 27698, 27732, 27805, 27836, 27900, 27932, 28199, 28289, 28998, 29018, 29188, 29222, 29575, 29615, 30014, 30095, 30178

2.42 POLICY EN2: BIODIVERSITY AND GEODIVERSITY

Overview

Policy EN2 sets out the Council's approach to protecting areas designated for nature conservation. It outlines the hierarchy of designated sites and explains how development affecting such sites should be considered. It also sets out the approach to Biodiversity Net Gain and biodiversity requirements in new developments.

In total, 159 representations from 155 respondents were submitted in relation to the contents of Policy EN2. These were received from local residents, Town/Parish Councils, a wildlife trust, agents/planning consultants, Government agencies/bodies (Environment Agency, Natural England), a climate action group, developers, a development industry representative.

Table 42.1: Question 39 - Policy EN2: Biodiversity and Geodiversity - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
159	155	147	3	9

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • BNG – target • BNG – metric • BNG – opportunities • BNG - In-perpetuity / Nature Recovery Network • BNG – irreplaceable habitats • Wildlife Habitat Networks • SPA/SAC • Nature Recovery Work • Delivery • Compensation, Development Benefits, Loss of Biodiversity • Viability • Delivery • Policy wording	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy NE4: Biodiversity & Geodiversity in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• BNG • Protection, enhancement, restoration • Green Infrastructure • Biodiversity measures • BNG - species • BNG - measures • BNG - compensation • BNG - perpetuity • BNG – evidence • Environment Bill (Act) • Functionally Linked Land • SSSI's • Local Biodiversity Priorities • Ecological Surveys	

Summary of Representations
Objections:
1. BNG - target • The requirement for a development to raise the score by at least 10% should be stated in the policy wording for clarity and consistency with Government policy. • The Council should not deviate from the Government's proposals to achieve a 10% net gain for biodiversity.
2. BNG – metric • Dry stone walls are key linear features for much of the district; these should be considered as part of the Metric otherwise biodiversity could be under-estimated. • Include a footnote or link to the Defra Metric 2 in Policy EN2.
3. BNG – opportunities • Reference could also be made to opportunity areas (which should be mapped) so developers understand where they are located and ensure that any biodiversity net gain contributes to local biodiversity priorities.
4. BNG – In-perpetuity / Nature Recovery Network

• Include the requirement for net gain to be provided “in perpetuity” and identifying links between net gain and the Nature Recovery Network.
5. BNG – Irreplaceable Habitats • Reference that biodiversity net gain does not apply to irreplaceable habitats and any biodiversity net gain which may impact on protected sites is additional to any existing legal or policy requirement for statutory protected areas.
6. Wildlife Habitat Networks • Policy EN2 refers to designated and undesignated Wildlife Habitat Networks. We propose that latter can be identified through a Neighbourhood Plan. • We are disappointed to see that the Bradford Wildlife Habitat Network is not included on the interactive map to allow consideration of the appropriate location of site allocations. • Objection to the loss of any of the Wildlife Habitat Network and any such allocations which may directly or indirectly impact upon these areas must commit to retain and enhance the network.
7. SPA/SAC • Reference to the North Pennine Moors SPA/SAC should be added to the table to ensure consistency.
8. Nature Recovery Network • Refer to the Nature Recovery Network and recognition of the role of the Network as a major commitment in the government’s 25 Year Environment Plan.
9. Delivery • Reference could also be made to the delivery mechanism - planning conditions or S106 agreements?
10. Compensation, Development Benefits, Loss of Biodiversity • Compensation for loss of existing biodiversity and offsetting should [4.26.17] be a last resort. How do we qualify and quantify where we need to exercise this last resort? Compensation seems to be an easy approach for developers who might make large profits. How do we protect these sites in perpetuity? How do we get properly independent assessments on impact of development? How do we decide and who decides that benefits of a development outweigh the importance of the biodiversity interest (G)? How will the council promote recommendations for household applications [4.26.12]?
11. Viability

- There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's updated viability assessment.

Support:

1. **Policy wording**
   - We would recommend that any policy referencing this includes the term "measurable net gain" as per the wording in the revised NPPF.

2. **Protection, enhancement, restoration**
   - We fully support a policy which protects, enhances, restoration and expands biodiversity and geodiversity.
   - Natural England broadly welcomes the approach within this policy. Policy EN2 sets out a clear strategy for the protection and enhancement of biodiversity. The policy seeks to provide considerable net gains in biodiversity, to deliver a coherent and high-quality ecological network, and to protect and enhance the most valuable habitats and species.

3. **BNG**
   - Net gain should be applicable to housing and business developments given the amount of building the council wants to do.
   - We support the current content of Policy EN2, in particular the references to BNG and the use of the DEFRA Biodiversity Metric; and also, the protection and strengthening of the Wildlife Habitat Network.

Comments:

1. **Policy wording**
   - Would support rewording of supporting text (4.26.16 onwards) - It should be made clear that the Mitigation Hierarchy is not part of BNG considerations; it is additional to the application of the mitigation hierarchy which must first be considered in line with legislation.
   - Section K substantially repeats the previous sections and should be removed.
   - We recommend the inclusion of the following additional bullet point / paragraph within the Biodiversity & Development section of the policy wording:
     "As well as assessing area-based (terrestrial) habitats, the DEFRA Biodiversity Metric includes two distinct supplementary modules for linear habitats (A: Hedgerows and lines of tress & B: Rivers and streams). Development proposals must be supported by evidence to demonstrate the achievement of measurable biodiversity net gains in each of the individual habitat types present within the proposed site regardless of likely adverse impacts. The biodiversity units calculated through the core habitat area-based metric and each of the supplementary linear-based modules are unique and cannot be summed or converted. When reporting biodiversity gains or losses with the metric, the different biodiversity unit types must be reported separately and not summed to give an overall biodiversity unit value"
     This reasoning is to ensure that the policy wording is in line with the latest Biodiversity Metric guidance. It is also to ensure that linear habitat types (e.g. hedgerows & river and streams) are included, not omitted, from BNG assessments.

2. **Green Infrastructure**
   - New green infrastructure should be maximised, including the use of imaginative new initiatives, such as micro-forests.

3. **Biodiversity measures**
   - Also include, cheap but potentially significant measures such as gaps in fences for hedgehogs.
   - Install swift bricks.
   - Limit the impact on the environment and build in the ability for nature to share the space with new inhabitants.

4. BNG

- All development (except householder applications) should deliver a measurable net gain in biodiversity value compared with the pre-development baseline. Proposals should be supported by evidence to demonstrate a biodiversity net gain using the current Defra Biodiversity Metric.
- Section J: There is no legal requirement to provide Biodiversity Net Gain (BNG) within a development site as a matter of priority, nor is there any legal requirement for the need to justify why gain cannot be delivered on site. The policy should be reworded to allow for offsite mitigation in all cases. There is also no legal requirement to provide BNG compensation "a preference for those in the immediate vicinity" and this should also be removed.
- There is also no legal requirement to provide BNG compensation as a preference for those in the immediate vicinity" and this should also be removed.
- Whilst the achievement of biodiversity net gain as required by draft Policy EN2 is supported in principle, until such time as the Environment Bill clarifies the requirement for biodiversity net gain it is recommended that part H of this policy be amended to refer to all development delivering a measurable net gain "where practical to do so", so as not to undermine the development of otherwise sustainable sites.

5. BNG – target

- The requirement for a development to raise the score by at least 10% should be stated in the policy wording for clarity.

6. BNG – species

- Section J: Biodiversity net gain is a habitat-based system and while there will inevitably be benefits to species the mechanism is not targeted to the conservation of individual species. We suggest that the last sentence of this policy be deleted as the BNG mechanism does not address species conservation.

7. BNG – Well-being

- Section M is unclear and ambiguously worded. BNG is a tool for securing gain in biodiversity not "well-being". It is also not clear how this policy will be implemented in practice.

8. BNG – Compensation

- Clarity should be made that loss of and impacts upon designated sites, and priority habitats are not appropriate for inclusion within any metric calculations and bespoke compensation will be required, should avoidance not be possible for reasons of overriding public interest.

9. BNG – perpetuity

- Policy - Section K - clarity should be made that offsets will need to be secured and maintained/monitored for a minimum of 30 years (BS 8683).

10. BNG – Evidence

- Need to consider how net gain will be incorporated into the Local Plan and Supplementary Planning documents and what supporting evidence is required. BNG policy needs to be founded on good yet proportionate evidence. There is opportunity to consider Nature Recovery Strategies within this evidence gathering and wider natural capital goals.

11. Environment Bill (Act)

- The Council's policy approach should also reflect the Government's proposals for a transition period of two years as set out in the Environment Bill.
- Section I should not reference the Environment Bill, because there is no certainty as to the Bills final form or content.

12. Wildlife Habitat Networks

- The Wildlife Habitat network should be defined on the policies map.
- Section A: The Wildlife Habitat Network should be defined on the policies map. Without further explanation "undesignated sites of high conservation value" has no meaning as it is a value judgement of whether a site is of "high" conservation value or not.
- Section D: The Wildlife Habitat Network needs to be defined in order to provide certainty (see also paragraph 2.81). The policy does not allow sufficiently flexibility for mitigation and compensatory measures and should be reworded to reflect this.
- Section E. The policy seems to refer to the movement of any species including those with poor dispersal mechanisms. Perhaps the policy should state "or impair the functioning of the Network by preventing movement of species" that are relevant to that Network.

13. Functionally Link Land

- Section B incorrectly refers to "functionally linked land" as if it were part of the SPA in that it applies the likely significant effect test to functionally linked land. The correct test is whether the effects on functionally linked land will have a likely significant effect upon the SPA, not the functionally linked land. In order to be compliant with Habitat Regulations the text within the bracket "(or land functionally linked to the SPA)" must be deleted. The final paragraph of Section B further perpetuates this error and should be deleted in order to comply with the Habitats Regulations, 2017 (as amended). Section B is linked to Policy SP11. The proposed changes suggested for SP11 will modify the application of Section B of the policy.

14. SSSIs

- Section C: There is no legal requirement for impacts upon SSSI to be assessed "in combination with other developments" and this reference should be removed as it does not reflect the Wildlife and Countryside Act 1981 (as amended). Similarly, there is no legal

requirement to assess “broader impacts on the national network of SSSIs.” The use of the phrase is ambiguous and should be removed.
15. Local Biodiversity Priorities • Section J: What are “local biodiversity priorities”? If the policy is referring to specific species and habitats such as those defined by Local Biodiversity Action Plans, the NERC Act, 2006, or Birds of Conservation Concern etc. then this should be specified.
16. Ecological Surveys • Section N: Ecological surveys should be carried out in manner that is also proportionate to the ecological features present on the site, not just the type and scale of the development.

Representation IDs: 310, 1921, 3287, 3704, 11567, 11570, 16608, 18399, 19865, 19866, 19934, 21813, 21896, 21925, 21954, 21983, 22012, 22041, 22073, 22102, 22131, 22160, 22200, 22229, 22258, 22287, 22316, 22345, 22374, 22485, 22514, 22543, 22572, 22610, 22639, 22668, 22697, 22726, 22755, 22799, 22828, 22866, 22895, 22924, 22953, 22982, 23011, 23040, 23069, 23125, 23154, 23183, 23212, 23241, 23270, 23299, 23328, 23357, 23386, 23415, 23444, 23619, 24131, 24175, 24214, 24327, 24356, 24385, 24414, 24445, 24474, 24559, 24588, 24637, 24712, 24750, 24779, 24857, 24896, 24944, 24973, 25002, 25032, 25062, 25096, 25147, 25172, 25201, 25230, 25442, 25491, 25720, 25749, 25778, 25807, 25836, 25865, 25894, 25923, 25952, 25981, 26010, 26039, 26068, 26097, 26126, 26155, 26184, 26213, 26242, 26271, 26301, 26336, 26365, 26578, 26693, 26725, 26768, 26811, 26840, 26869, 26898, 26927, 26958, 26987, 27019, 27048, 27077, 27130, 27159, 27188, 27217, 27246, 27278, 27307, 27336, 27365, 27394, 27423, 27452, 27574, 27650, 27699, 27733, 27806, 27837, 27901, 27922, 28200, 28290, 29117, 29189, 29191, 29223, 29576, 29616, 30015, 30096, 30179

2.43 POLICY EN3: TREES AND WOODLANDS

Overview

Policy EN3 sets out the Council's approach to protecting and enhancing the contributions that trees and woodland make to the district's character.

In total, **156** representations from **156** respondents were submitted in relation to the contents of Policy EN3. These were received from local residents, Town/Parish Councils, a sub-regional body (West Yorkshire Combined Authority), Government agencies/bodies (Historic England, Natural England), a climate action group, a development industry representative, developers, agents and a neighbouring local authority.

Table 2.43.1: Question 41 - Policy EN3: Trees and Woodland – Summary of Representations Received

Consultation Question 41 - Policy EN3: Trees and Woodlands				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
156	**156**	**7**	**146**	**3**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Replacement of tree provision • Requirement for provision of trees • Retention of trees • Hedgerows • Tree Preservation Orders • Targets • General support • Support for protection • White Rose Forest • Mature Tree Protection	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy NE6: Trees, Woodland & Hedgerows in the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Replacement tree provision • Section E: Application of this policy is problematic because there may not be sufficient space to accommodate three new trees for every tree that is lost, particularly on smaller development sites. Developers also risk planting trees onto semi-natural habitats that have equal if not greater value than planted trees in order to fulfil the requirements of the policy. The policy needs to be reworded to provide flexibility and indicate that planting will be expected unless there are over-riding reasons.
2. Requirement for provision of trees • The policy to plant new trees and woodland on all new developments in both public and private areas, including a fruit tree in every garden, should be deleted. Concern that there are also practical difficulties with tree planting in rear gardens which often also accommodate underground utility infrastructure inconsistent with the planting of trees. • What is the justification and evidence for the requirement for a fruit tree in every garden, this is an additional cost, that a new resident may not want and may remove once moved into the property. The HBF, recommends that this part of the policy is deleted. They also commented that they would like to know what the justification and evidence is for this ratio of a 3:1 replacement for any lost mature trees in developments. The HBF also recommends that this part of the policy is deleted. • Section D: Application of this policy could cause potential problems for properties with relatively small gardens. The policy should be amended to specify planting in gardens above a particular size.
3. Retention of trees • Part C of the policy, proposing a presumption in favour of the retention and enhancement of trees, woodland and hedgerow cover is not advocated within the NPPF. The policy is flawed in that whilst a tree may hold some biodiversity value, its loss and replacement with other enhancements could lead to an overall gain and the policy does not allow for such consideration. This part of the policy is unnecessary as it is covered by Policy DS2 and should be deleted.
4. Hedgerows • Section C: Hedgerows contains trees, but the policy is for Trees and Woodland, not hedgerows. Suggest that "and hedgerow cover" is removed. Hedgerows are legally protected and inclusion in this policy is not necessary to ensure protection.
5. Tree Preservation Orders

- Section G: Could CBMDC serve notice of a TPO at any time before, during and after the period of a planning application? If mitigation or compensation significantly outweighs the loss of trees within a development site, for example to create other, more appropriate semi-natural habitats, then there is a risk of protecting trees of an inferior quality to what is being proposed in order to secure short-term objectives.

Support:

1. **Targets**
   - 12% woodland cover by 2060 is not ambitious enough.
2. **Replacement tree provision**
   - The ratio of 3 new trees to 1 felled tree is too low - the benefit of one large, mature tree is far greater than 3 new ones. Please could that be increased to 10.
3. **General Support**
   - Natural England responded that it is in support of the policy and note that it is in accordance with NPPF.
4. **Support for protection**
   - Support the enhancement, protection and expansion of trees and woodland. Agree that development proposals which result in loss or deterioration of irreplaceable habitats should be refused. Although would like to see more clarity on what constitutes wholly exceptional reasons(B). How can something which has been deemed irreplaceable be compensated for? There should also be more enforcement and deterrence against pre-emptive felling.
   - Support for the policy to protect and enhance the contribution trees and woodland make to the character of the district. Support Criterion C the retention of trees, woodland and hedgerows.

Comments:

1. **White Rose Forest**
   - Greater reference should be made to achieving the aims of the White Rose Forest.
2. **Mature tree retention**
   - Existing mature green infrastructure should always be retained, for example, areas of mature trees on designated development sites.

Representation IDs: 311, 1922, 3705, 3860, 15774, 19868, 19936, 21814, 21897, 21926, 21955, 21984, 22013, 22042, 22074, 22103, 22132, 22161, 22201, 22230, 22259, 22288, 22317, 22346, 22375, 22486, 22515, 22544, 22573, 22611, 22640, 22669, 22698, 22727, 22756, 22800, 22829, 22867, 22896, 22925, 22954, 22983, 23012, 23041, 23070, 23126, 23155, 23184, 23213, 23242, 23271, 23300, 23329, 23358, 23387, 23416, 23445, 23620, 24132, 24176, 24215, 24328, 24357, 24386, 24415, 24446, 24475, 24560, 24589, 24638, 24713, 24751, 24780, 24858, 24945, 24974, 25003, 25033, 25063, 25097, 25148, 25173, 25202, 25231, 25443, 25492, 25721, 25750, 25779, 25808, 25837, 25866, 25895, 25924, 25953, 25982, 26011, 26040, 26069, 26098, 26127, 26156, 26185, 26214, 26243, 26272, 26302, 26337, 26366, 26579, 26694, 26726, 26769, 26812, 26841, 26870, 26899, 26928, 26959, 26988, 27020, 27049, 27078, 27131, 27160, 27189, 27218, 27247, 27279, 27308, 27337, 27366, 27395, 27424, 27453, 27575, 27660, 27700, 27734, 27807, 27838, 27902, 27923, 27964, 28201, 28291, 28529, 29072, 29224, 29577, 29617, 29633, 29711, 30016, 30097, 30180

44. POLICY EN4: HISTORIC ENVIRONMENT

Overview

44.1 Policy EN4 provides a positive strategy for the historic environment since protecting and enhancing the historic environment is one of the Government's core objectives in the promotion of sustainable development. It contributes towards Local Plan Strategic Objective 12 and links to the following policies SP2, SP10, TR4 and EN5. It is implementation will a wide range of partners.

44.2 In total, **154** representations from **153** respondents were submitted in relation to the contents of Policy EN4. These were received from local residents, Town/Parish Councils, elected members, a waterways body (Canal and River Trust), a sub-regional body (West Yorkshire Archaeology Advisory Service), a national heritage organisation (The National Trust) and a government agency/body (Historic England).

Table 44.1: Question 42 - Policy EN4: Historic Environment - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
154	**153**	**3**	**147**	**4**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Strategic policy • Retrofitting/ Energy efficiency • Conformity with National Policy • Heritage Asset Statistics • Wording changes • General support • Additional Policy • Historic Environment Record • World Heritage Site • Additional Policy	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy HE1: Historic Environment in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Leeds Liverpool Canal • Tong Valley/Tong Village	

Summary of Representations
Objections:
1. Strategic Policy • Suggestion that the Local Plan should contain a strategic policy for the historic environment, setting out a positive strategy for its conservation and enjoyment. Non-strategic Policy EN4 contains elements that could form the basis of a strategic policy, highlighting elements of the district's historic environment that are of especial importance that will be a particular focus of conservation efforts.
2. Retrofitting / Energy efficiency • Supportive of the policy (Saltaire World Heritage Site) but would request that it is expanded, or a new policy is provided to encourage the retrofitting of existing buildings within the WHS to improve the energy efficiency of buildings, e.g. insulation, solar panels where these would not be prominent, more efficient and low carbon heat sources.
3. Conformity with National Policy • Concern that there is not sufficient guidance that heritage decisions will be taken in accordance with national policy in the NPPF. The policy should contain direction on how harm to the significance of heritage assets will be assessed by the Council.
4. Heritage Asset Statistics • The number of designated heritage assets listed under paragraph 4.28.10 is different to the records held by Historic England - amend as follows: Saltaire World Heritage Site; 2,293 listed buildings (including 23 Grade I, 69 Grade II*); 59 Conservation Areas, 15 Historic Parks and Gardens; 195 Schedule Monuments; Historic Battlefield Site at Adwalton Moor, Tong.

5. Wording changes

- Amend the final sentence of paragraph 4.28.16 - as it is unclear.
- Amend point C to read: "Require that all proposals for development conserve and where appropriate, enhance the heritage significance and setting of Bradford's heritage assets".
- Amend point E to read: "The alteration, extension or substantial demolition of a listed building will only be permitted if it can be demonstrated that the proposal: 1. Would not have any adverse effect upon the special architectural or historic interest of the building or its setting; 2. Is appropriate in terms of design, scale, detailing and materials; and 3. Would minimise the loss of historic fabric of the building. or 4. If there is harm to the special interest of the building, that this is outweighed by the public benefits of the proposal."

Support:

1. General support

- General support for the policy - to preserve, protect and celebrated the beautiful architecture. Some amazing buildings that have fallen into disrepair or are extremely neglected.
- General support for the policy which proactively protects and enhances the historic environment.
- Supportive of the policy to proactively preserve, protect and enhance the character, appearance, archaeological and historic value and significance of the district's designated and undesignated heritage assets and their setting. Also supportive of point C to require that all proposals for development conserve and where appropriate enhance the heritage significance and setting Bradford's heritage assets.
- Support for the policy in terms of setting out the considerable wealth of assets of the district and the contribution they make towards the distinctive character of Bradford.

2. Additional Policy

- Medium and small sized villages are only mentioned in general terms. Consideration should be given to providing a more detailed and specific policy for each settlement by working with Town and Parish Councils. Cooperation between these bodies, community groups and the Council is crucial in defining where responsibility lies for the protection of these assets.
- Under point F there is reference to non-designated heritage assets. The identification and listing of these assets is commonly done through Neighbourhood Plans, and this should be referenced in the policy.

3. Historic Environment Record

- The policy needs to refer developers to the Historic Environment Record for the identification of non-designated heritage assets held in the West Yorkshire HER that might exist within the area of proposed interest, and the potential that unidentified NDHAs may be within the area of interest.

4. World Heritage Site

- Specific support for the requirement for development proposals to have regard to the World Heritage Site Management Plan, the World Heritage Site Environmental Capacity study and the Saltaire Conservation Area Appraisal.

Comments:

1. Additional Policy

- Using heritage as part of regeneration has been disappointing in Keighley. North Street is shabby and Low Mill is being allowed to descend into ruins. Mills along the river is another example. There needs to be a strategy to identify sites and how they may be restored. Also look at creating proper heritage trails.

2. Leeds and Liverpool Canal

- General support for the policy and welcome the reference to industrial heritage at C2. However, specific reference to the canal should be included, making it clearer to decision makers that it is a heritage asset. This is pertinent as the multifunctional role of the canal means its heritage value is not always obvious.

3. Tong Valley / Tong Village

- Tong Valley, and Tong Village conservation area should be included for specific consideration and treatment within the non-designated heritage assets of the district.

2.45 POLICY EN5: LANDSCAPE

Overview

Policy EN5 seeks to ensure that proposals for development and other projects, which could have an impact on the landscapes within the district, particularly, but not exclusively, those on the edge of settlements, contribute towards the management and enhancement of the district's landscapes, biodiversity and heritage resources. It also contributes towards a range of other objectives, including the maintenance and restoration of habitats and the protection of historic assets (including parks and gardens) and their settings. The policy has evolved in response to issues raised by consultees and the sustainability appraisal; key concerns were local distinctiveness, securing biodiversity gains and the need for landscape enhancement, particularly in the urban fringe. It also reinforces the criteria identified in Policy SP10 in relation to elements that contribute towards Green Infrastructure as well as complementing Policy EN4 in relation to historic elements in the landscape, the importance of setting and cultural associations. There are also strong links with Policy EN2 relating to biodiversity.

In total, **9** representations from **8** respondents were submitted in relation to the contents of Policy EN5. These were received from local residents, a Town/Parish Council, an elected member, a sub-regional body (West Yorkshire Archaeological Advisory Service) and Government agencies/bodies (Historic England, Natural England).

Table 2.45.1: Question 44 - Policy EN5: Landscape - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
9	8	1	5	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • SEBAR • Incinerator • Dry stone walls • Policy compliance and sites • National Character Areas • Floodlighting • Historic Landscape Characterisation • NPPF changes	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy NE7: Landscape Character and Sensitivity in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. SEBAR • The new road and housing plans directly affect a Grade II listed house and land.
Support:
1. Incinerator • An incinerator in the Aire Valley would be both dangerous and an eyesore.
2. Dry stone walls • A key feature of the landscape character for large parts of the district are the dry-stone walls, and this should be referenced in point B.
3. Policy compliance and sites • Support for the aims of this policy but other proposals in the plan fail to comply with it. Example: housing developments at site IL1/H and IL3/H which would conflict with sections B1, 2, 3.
4. National Character Areas • Support for the policy and the use of the National Character Areas in the development of the policy. Welcome the evolution of the policy to address local distinctiveness, securing biodiversity net gains and the need for landscape enhancement.
Comments:
1. Floodlighting • Particularly pertinent in Keighley West ward where there is floodlighting in an open area of Green Belt.
2. Historic Landscape Characterisation • A Historic Landscape Characterisation assessment of West Yorkshire has been prepared and identifies the extent to which the historic character of areas has survived as a recognisable element of the modern landscape and should be helpful to developers in ensuring sympathetic development in areas outside conservation areas and help to respect and conserve the historic character of an area. The policy should acknowledge the study, and large-scale developments should be referred to WYAAS to consult this information.
3. NPPF changes • Note that consultation on the NPPF was seeking a change regarding the scale and extent of development within the setting of a National Park or AONB - that this should be sensitively located and designed to avoid adverse impacts on designated landscapes. Welcome the approach in the SA in assessing potential allocations in the Wharfedale areas for any potential impacts on Protected Landscape outside the District boundaries.

Representation IDs: 313, 3289, 3707, 3759, 9817, 15749, 19869, 19870, 29075

2.46 POLICY EN6: COUNTRYSIDE AND DEVELOPMENT

Overview

Policy EN6 aims to protect the countryside and manage development in a way that supports rural communities and the rural economy whilst maintaining its essential attributes. The countryside is defined as everywhere outside of the settlement boundaries and the majority of the designated countryside is identified as Green Belt through Policy SP5 which seeks to restrict further development. Any proposals in such areas will also have to be determined through the requirements of Policy SP5.

In total, **150** representations from **150** respondents were submitted in relation to the contents of Policy EN6. These were received from local residents, Town/Parish Councils, agents, an elected member, a Government agency/body (Sport England) and a national heritage organisation (The National Trust).

Table 2.46.1: Question 44 - Policy EN6: Countryside and Development - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
150	150	3	144	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • SEBAR • Policies Map conflict • Sporting facilities • Support Public Rights of Way • Policy exceptions • Green Belt • Disabled access • Rewilding • East Riddlesden Hall	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy NE8: Development in the Countryside in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. SEBAR • The new road and housing plans directly affect a Grade II listed house and land.
2. Policies map conflict • Supportive of the policy aims, but the policies map shows sites which are allocated for development also being within the countryside designation. Advocate site allocations being removed from the countryside as defined by policy EN6.
3. Sporting facilities • Some sporting facilities are acceptable in the countryside - policy should make clear that such facilities which required a rural location or serve an existing rural sport facility are acceptable in the countryside. • Policy should be positively worded to protect and encourage peripatetic sporting events as well as permanent sports facilities.
Support:
1. Rights of Way • Protecting public rights of way is important.
2. Policy exceptions • Agree that countryside should be protected and support proposals A1-6 which set out the limitations of development in the countryside, but don't appear to fully describe exceptions. Gives impression countryside is protected but could easily be declassified.
3. Green Belt • Policy appears to include Green Belt, but does not refer to the mechanisms to potentially declassify Green Belt or extend settlement boundaries. • Any development within Green Belt should have rights of way protected and enhanced.
4. Policies map conflict • Support for this policy which is sound, but other proposals in the plan fail to comply with it. The policy clearly and unambiguously defines countryside as "everywhere outside of the settlement boundaries". Housing developments at sites IL1/H and IL3/H are outside the settlement boundary. The housing layer violates the countryside allocation.
Comments:
1. Disabled access

• Unclear what supporting disabled access means.
2. Rewilding • Much of the agriculture is becoming unsustainable. Consideration should be given to identifying sites for rewilding or as nature reserves, and facilitating educational opportunities.
3. Policies map conflict • Note that the extent of the countryside is expected to change to accommodate additional allocation for development as required to meet the housing and employment land requirements in the most appropriate locations.
4. East Riddlesden Hall • Noted that land to the south east of East Riddlesden Hall estate is designated as green belt and also to be allocated as 'countryside' under Policy EN6. Recognised that this is a new policy and sets out the approach to managing development in this designated area, which restricts development to certain appropriate countryside compatible uses.

Representation IDs: 314, 1924, 3708, 3756, 5432, 9818, 18400, 19680, 21816, 21899, 21928, 21957, 21986, 22015, 22044, 22076, 22105, 22134, 22163, 22203, 22232, 22261, 22290, 22319, 22348, 22377, 22488, 22517, 22546, 22575, 22613, 22642, 22671, 22700, 22729, 22758, 22802, 22831, 22869, 22898, 22927, 22956, 22985, 23014, 23043, 23072, 23128, 23157, 23186, 23215, 23244, 23273, 23302, 23331, 23360, 23389, 23418, 23447, 23622, 24134, 24178, 24217, 24330, 24359, 24388, 24417, 24448, 24477, 24562, 24591, 24640, 24715, 24753, 24782, 24860, 24947, 24976, 25005, 25035, 25065, 25099, 25150, 25204, 25233, 25445, 25494, 25723, 25752, 25781, 25810, 25839, 25868, 25897, 25926, 25955, 25984, 26013, 26042, 26071, 26100, 26129, 26158, 26187, 26216, 26245, 26274, 26304, 26339, 26368, 26581, 26696, 26728, 26771, 26814, 26843, 26872, 26901, 26930, 26961, 26990, 27022, 27051, 27080, 27133, 27162, 27191, 27220, 27249, 27281, 27310, 27339, 27368, 27397, 27426, 27455, 27577, 27702, 27736, 27809, 27840, 27904, 28203, 28293, 29000, 29226, 29579, 29619, 30018, 30099, 30182

47. POLICY EN7: FLOOD RISK

Overview

47.1 The overall objectives of Policy EN7 are to appraise, manage and reduce the risk of flooding. The policy identifies the principles to guide the process of identifying locations for future development while seeking to reduce flood risk, assess proposals that come forward and adopt a positive approach to water management.

47.2 In total, **158** representations from **157** respondents were submitted in relation to the contents of Policy EN7. These were received from local residents, Town/Parish Councils, a sub-regional body (West Yorkshire Combined Authority), elected members, a neighbouring local authority and Government agencies/bodies (Environment Agency, Historic England).

Table 47.1: Question 45 - Policy EN7: Flood Risk - Summary of Representations Received

Consultation Question 45 - Policy EN7: Flood Risk				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
158	**157**	**148**	**3**	**7**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Policy compliance and sites (Ilkley) • Area and site-specific risk • Climate change allowance • Strengthen policy for high flood risk areas and settlements downstream • Floodplain development • Flood zone definitions • Flood zone 3a development • Flood Risak Assessments - Addingham	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy CR4: Flood Risk and Water Management in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Floodplains • Surface permeability and flooding • Early assessment • Adjacent Local Authority areas / Site specific risk • Catchment scale • Flood Risk Assessments • Joint working; Neighbouring Authorities	

Summary of Representations
Objections:
1. Policy compliance and sites (Ilkley) • Point A1 requires development to be directed to areas with the lowest risk of flooding. Sites IL1/H and IL3/H have risk of flooding and both sites flood. IL1/H is likely to increase flooding at IL3/H due to surface water runoff as it is situated downhill of IL1/H. This is contrary to Point A2 which requires development not to increase the flood risk elsewhere.
2. Area and site-specific risk • East of Ilkley a known flood risk area. Development will cause higher level of run-off and potential for more flooding at the main road.
• The centre of Addingham is prone to flooding - Town Beck frequently overtops. No additional flood prevention measures have been put in place in Addingham. Development of greenfield areas will significantly increase flood risks downstream, with more existing properties being exposed to more frequent flooding. These risks will increase with the impacts of climate change. No further development should be permitted until a Flood Risk Assessment of Addingham has been completed.
3. Climate change allowance • Flood risk assessments are based on historic data. Climate Change will have an impact on flooding events in terms of regularity and severity. There should be an estimate of projected impacts on proposed development sites.
4. Strengthen policy for high flood risk areas and settlements downstream

- Recent developments close to rivers have experienced property damaging floods. Are the current limitations on development on land prone to flooding sufficient. Barriers to development on sites with high flood risk should be strengthened. Impact of flooding on settlements downstream from close-to-river sites should be raised in priority for assessment.

5. Floodplain development

- Development in the floodplain must not be permitted. Point A4 appears to contradict the policies and aims detailed elsewhere in the draft plan.

6. Flood zone definitions

- Point A5 mentions Flood Zones 2 and 3a but does not define them.

7. Flood zone 3a development

- Development in Flood Zone 3a should be prevented and there should be a longer-term aim of removing existing development within this zone.

8. Flood Risk Assessments

- The centre of Addingham is prone to flooding - Town Beck frequently overtops. No additional flood prevention measures have been put in place in Addingham. Development of greenfield areas will significantly increase flood risks downstream, with more existing properties being exposed to more frequent flooding. These risks will increase with the impacts of climate change. No further development should be permitted until a Flood Risk Assessment of Addingham has been completed.

Support:

1. Floodplains

- Too many houses and industrial sites are built on areas of flooding. Floodplains play a vital role and should not be altered.

2. Surface permeability and flooding

- People should be discouraged from completely tarmacking/bricking over their gardens as this causes massive problem with surface water, habitats and biodiversity.

3. Early assessment

- The assessment of Flood Risk and mitigation strategies must be considered at the pre-application stage or integrated as part of the development application.

Comments:

1. Adjacent Local Authority areas / Site specific risk • Policy should take into account flood risk damage to adjacent authorities. Site allocations SE37/H, SE46/H, SE47/H and SE48/H appear to flaunt the policies relating to flood prevention. These sites are at the head of Cockersdale stream and Tong stream draining down through into Leeds MDC area. Flooding happened regularly in the Tong Valley and has become more serious following previous building in Holme Wood and due to climate change.
2. Catchment scale • Policy would benefit from referencing managing flood risk at catchment scale. This would demonstrate greater alignment with the City Region Flood Review and support wider FRM activities across the catchment.
3. Flood Risk assessments • Flood risk assessments including groundwater flood risk must be undertaken before allocation of sites and not at the planning application stage.
4. Joint working; Neighbouring Authorities • Work to look at joint flood risk challenges should continue to ensure development of allocated sites is not detrimental to North Yorkshire communities.

Representation IDs: 315, 1834, 1925, 1959, 2532, 3291, 3353, 3709, 13886, 15815, 21619, 21826, 21900, 21929, 21958, 21987, 22016, 22045, 22077, 22106, 22135, 22164, 22204, 22233, 22262, 22291, 22320, 22349, 22378, 22489, 22518, 22547, 22576, 22614, 22643, 22672, 22701, 22730, 22759, 22803, 22832, 22870, 22899, 22928, 22957, 22986, 23015, 23044, 23073, 23129, 23158, 23187, 23216, 23245, 23274, 23303, 23332, 23361, 23390, 23419, 23448, 23623, 23658, 24135, 24179, 24218, 24331, 24360, 24389, 24418, 24449, 24478, 24563, 24592, 24641, 24716, 24754, 24783, 24861, 24948, 24977, 25006, 25036, 25066, 25100, 25151, 25205, 25234, 25446, 25495, 25724, 25753, 25782, 25811, 25840, 25869, 25898, 25927, 25956, 25985, 26014, 26043, 26072, 26101, 26130, 26159, 26188, 26217, 26246, 26275, 26305, 26340, 26369, 26582, 26697, 26729, 26772, 26815, 26844, 26873, 26902, 26931, 26962, 26991, 27023, 27052, 27081, 27134, 27163, 27192, 27221, 27250, 27282, 27311, 27340, 27369, 27398, 27427, 27456, 27578, 27703, 27737, 27810, 27841, 27860, 27905, 28204, 28294, 29076, 29202, 29203, 29227, 29580, 29620, 30019, 30037, 30100, 30183

2.48 POLICY EN8: AIR QUALITY

Overview

The policy sets out a detailed series of measures to support an improvement in air quality at a strategic level and minimise the impact on human and ecological health in areas of poor air quality, particularly within the proposed CAZ.

In total, **151** representations from **151** respondents were submitted in relation to the contents of Policy EN8. These were received from local residents, a Town/Parish Council, Government agencies/bodies (Highways England, Natural England), a developer, an agent and a neighbouring local authority.

Table 2.48.1: Question 46 - Policy EN8: Air Quality - Summary of Representations Received

Consultation Question 46 - Policy EN8: Air Quality				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
151	**151**	**1**	**146**	**4**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Green Belt • Managing impact • General support • Threshold support • CAZ SPD • Green Infrastructure • Agricultural • Natural environment (SA & HRA) • Sites in the CAZ • Neighbouring authorities	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy CR1: Air Quality in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Green Belt • Objection to building houses and the road in the green belt around Tong.
Support:
1. Managing impacts • A number of schemes will have adverse impacts on air quality (road widening, incinerators, car parking, out-of-town retail centres, building to regenerate, expensive public transport) and more needs to be done e.g. Greening school grounds, community allotments.
• Support for the policy approach to make developments 'air quality neutral'. Any knock-on-effects as a result of development need to be considered and minimised. This should include effects on residents travelling to work in neighbouring districts. Consideration should be given to the policy's application to commercial developments as well as residential ones.
2. General support • General support for the Clean Air Zone.
3. Threshold • Support for the threshold in part B of the policy.
Comments:
1. Green Belt • Development in the Green Belt around Tong Valley and in particular the new road (SEBAR), will lead to an increase in air pollution.
• There are internal tensions within the plan between the policy positions of Policies EN8 and EN9 and the development of a new road, new houses and commercial development in the Green Belt which will benefit those outside of the district but bring traffic and pollution into the vicinity of the Tong Village.
2. CAZ SPD • Broad support for Policy EN8 in tackling air pollution and improving air quality in the district. Support for the emerging CAZ SPD and ensuring that its aspirations do not impact upon the safe operation of the Strategic Road Network.
3. Green Infrastructure • Support for the approach in the policy to tackling air pollution and improving air quality particularly in terms of the role Green Infrastructure can play in absorbing pollutants.

4. Agriculture • Policy should acknowledge that new agricultural development (e.g. intensive pig and poultry farming) may pose a risk to air quality.
5. Natural environment (SA & HRA) • The plan should address impacts of air quality on the natural environment, particularly traffic impacts associated with new development where this affects European sites and SSSIs. The SA and HRA should also consider the detrimental impacts on the natural environment and suggest appropriate avoidance or mitigation measures.
• The plan/SA/HRA should address proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation. The effects can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling. The designated site at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification.
6. Sites in the CAZ • The policy should be clarified to make it clear that the requirement for developments to be air quality neutral only applies to those developments located within the Clean Air Zone as such requirements outside of the zone are unlikely to be justified.
7. Neighbouring authorities • Kirklees is keen to engage and understand the implications of the proposals once the transport modelling has been carried out. Particularly in relation to the impact on the local and strategic road networks, and air quality management areas in the southern areas of Birkinshaw. Also, consideration should be made to improving walking and cycling links in this area.

Representation IDs: 316, 1926, 2941, 3710, 5618, 13871, 15534, 19871, 21827, 21901, 21930, 21959, 21988, 22017, 22046, 22078, 22107, 22136, 22165, 22205, 22234, 22263, 22292, 22321, 22350, 22379, 22490, 22519, 22548, 22577, 22615, 22644, 22673, 22702, 22731, 22760, 22804, 22833, 22871, 22900, 22929, 22958, 22987, 23016, 23045, 23074, 23130, 23159, 23188, 23217, 23246, 23275, 23304, 23333, 23362, 23391, 23420, 23449, 23624, 24136, 24180, 24219, 24332, 24361, 24390, 24419, 24450, 24479, 24564, 24593, 24642, 24717, 24755, 24784, 24862, 24949, 24978, 25007, 25037, 25067, 25101, 25152, 25206, 25235, 25447, 25496, 25725, 25754, 25783, 25812, 25841, 25870, 25899, 25928, 25957, 25986, 26015, 26044, 26073, 26102, 26131, 26160, 26189, 26218, 26247, 26276, 26306, 26341, 26370, 26583, 26698, 26730, 26773, 26816, 26845, 26874, 26903, 26932, 26963, 26992, 27024, 27053, 27082, 27135, 27164, 27193, 27222, 27251, 27283, 27312, 27341, 27370, 27399, 27428, 27457, 27579, 27704, 27738, 27781, 27811, 27842, 27906, 28205, 28295, 29228, 29581, 29621, 29629, 30020, 30101, 30184

2.49 POLICY EN9: ENVIRONMENTAL PROTECTION

Overview

It is important that the quality of land, air and water in the district is protected and not adversely affected by new development. Policy EN9 covers a number of areas relating to pollution control including land, nuisance, and water quality. The overall aim of the policy is to protect public health and the environment by ensuring that all forms of pollution are minimised and adequately mitigated as part of new developments.

In total, **155** representations from **149** respondents were submitted in relation to the contents of Policy EN9. These were received from local residents, a Town/Parish Council, Government agencies/bodies (The Coal Authority, Environment Agency, Highways England, Historic England, Natural England) and a utilities network owner (National Grid).

Table 2.49.1: Question 47 - Policy EN9: Environmental Protection - Summary of Representations Received

Consultation Question 47 - Policy EN9: Environmental Protection				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
155	**149**	**2**	**145**	**8**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Green Belt • Soils /Agricultural land • Light pollution • General support/Enforcement • Mining/ Land Stability • Nuisance/Noise issues • Policy conflict; Pollution from new road • National grid – overhead electricity lines	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy CR2: Environmental Protection in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• National grid – high pressure gas pipeline • Water supply / water quality / wastewater • Water quality / water pollution / contaminated land • Water quality • Buffer zone of riparian corridors • Culverts • Water Framework Directive • Contaminated Land	

Summary of Representations
Objections:
1. Green Belt • The green belt was set up to stop urban expansion. The new road and housing plans will directly affect a Grade II house and land.
2. Soils / Agricultural land • The policy could be strengthened by requiring developments to provide robust evidence to establish the status of agricultural land; further emphasise the importance of soils as a finite resource; recognise that soils of high environmental value should be considered as part of ecological connectivity.
• Policy should refer to the DEFRA Construction code of practice for the sustainable use of soils on construction sites. Development has an irreversible adverse impact on the finite stock of Best and Most Versatile land. Avoiding the loss of BMV is a priority, as mitigation is rarely possible. Retaining higher quality land provides options for future sustainable food production and helps secure ecosystem services.
3. Light pollution • The policy should address the impacts of light pollution on the natural environment. Light pollution has negative impacts on local amenity, intrinsically dark landscapes and nature conservation (e.g. bats and invertebrates).
Support:

Summary of Representations
1. General Support / Enforcement • Support for Policy EN9. Impact assessments should include both local and wider effects, including on neighbouring settlements. There should be rigorous enforcement of the resultant regulations.
2. Mining / Land Stability • Support for the policy which acknowledges the mining legacy of the area and requirement to consider ground conditions and risks posed by land instability in order to support development proposals.
3. Nuisance issues / Noise issues • Broad support for Policy EN9. The requirements of the policy to identify and address potential nuisance issues arising from development will help to reduce the impact of development at the strategic road network in terms of noise on the M606. Highways England should work with site promoters to ensure the policy aspirations are achieved.
Comments:
1. Policy conflict; Pollution from new road • There are internal tensions within the plan between the policy positions of Policies EN8 and EN9 and the development of a new road, new houses and commercial development in the Green Belt which will benefit those outside of the district but bring traffic and pollution into the vicinity of the Tong Village.
2. National grid – overhead electricity lines • Sites in close proximity to a National Grid asset should be aware that there is a policy of retaining existing overhead lines in-situ, except in exceptional circumstances. Guidance on developments which affect National Grid electricity assets is available and promotes the successful development of sites crossed by existing overhead lines and the creation of well-designed places. Statutory safety clearances between overhead lines, the ground and buildings must not be infringed. Where changes to ground level are proposed, safety clearances must not be infringed.
3. National grid – high pressure gas pipeline • Existing National Grid High-pressure gas pipelines should be left in-situ, and the Health and Safety Executive (HSE) should be informed of any proposals effecting these pipelines. National Grid has land rights (including it 12.2m building proximity distance) in respect of their assets preventing the construction of buildings/structures and storage of materials.

Summary of Representations
4. Water supply / water quality / wastewater • The capacity and quality of water supply systems and any impact development may have on the environment needs to be considered. Need to understand the supply and demand patterns now and in the future. The required levels of water efficiency and water supply infrastructure should be planned to support growth. The environmental capacity of the water environment should be considered using evidence from River Basin Management Plans. The quality and capacity of wastewater treatment works, and sewerage network should be considered. Additional capacity may be required to serve an increase in dwellings. Consideration needs to be given to the impact the development would have on the receiving water environment.
5. Water quality / water pollution / contaminated land • The plan must have regards to the objectives set out in the Water Environment Regulations 2017 and Ground Water Direction 2016 which aim for good chemical and quantitative status, reverse upward trends in pollution and prevent/limit entry of certain substances. Dealing with land contamination can help to achieve the objectives of the water framework directive. The SA should reflect groundwater and contaminated land matters.
6. Water quality • The wording of the policy relating to water quality should be amended as follows: The Council will work with developers and partner organisations to: - safeguard ground and surface water resources, including protecting Source Protection Zones from contamination. - ensure no deterioration in the status of water courses or any water bodies occurs. - ensure that development does not jeopardise any water body from achieving its Water Framework Directive objective of 'good' status; and - protect and improve water quality. Proposals for development will only be acceptable where there is no adverse impact on surface water bodies and groundwater resources, in terms of their quantity, quality and the important ecological features they support. Proposals for development will be supported where they: - make positive progress towards achieving 'good status or potential' under the Water Framework Directive for surface and groundwater bodies. - enhance the natural geomorphology of watercourses, including through the opening up of culverts, and the removal of modifications made as part of past industrial uses (e.g. removal or modification of weirs to address fish passage), or and through the restoration of man-made channels.

Summary of Representations
- manage water demand and improve water efficiency through the use of appropriate measures including rainwater harvesting and grey-water recycling. - include measures which help to reduce the potential for or mitigate against water shortages or drought.
7. Buffer zone of riparian corridors • All watercourses and their riparian corridors / floodplains provide excellent networks of blue and green infrastructure and should be protected and enhanced to provide multiple benefits. There should be un-development buffer zones of at least 10 m along main river and ordinary watercourses. These buffer zones will allow the creation and management of wildlife corridors to protect and enhance green and blue infrastructure.
8. Culverts • There should be a presumption against installing new culverts on watercourses. This is in line with EA guidance. Culverting causes adverse ecological impacts, flood risk, geomorphological, human safety and aesthetic impacts. Watercourses should be maintained as continuous corridors to maximise their benefits to society. There should also be a presumption of de-culverting and opening up watercourses where a new development is to be located over an existing culvert. Opportunities to re-naturalise watercourses should always be considered as part of developments.
9. Water Framework Directive • Support for the reference to the Water Framework Directive (WFD), however it should be noted that this was transposed into the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and reference should be made to this. Support for the WFD reference relating to not jeopardising our ability to reach 'good' status which is the ultimate aim of the legislation.
10. Contaminated land • Reference should be made to NPPF (2019) paragraphs 170 and 178, and the relevant EA guidance, promoting the National Quality Mark Scheme for Land Contamination Management. Development proposals on contaminated land, or land where the previous use may indicate some level of contamination must include an assessment of the extent of contamination and any possible risks. The assessment should include: -Ensuring sites are suitable for the intended use; -Applying a risk-based approach to assessing land contamination; -An assessment of the risk to surface water and groundwater receptors from land contamination; -The requirement for remediation/mitigation to reduce unacceptable risks to the environment.

Representation IDs: 1927, 3711, 3935, 13872, 15535, 19872, 21828, 21902, 21931, 21960, 21989, 22018, 22047, 22079, 22108, 22137, 22166, 22206, 22235, 22264, 22293, 22322, 22351, 22380, 22491, 22520, 22549, 22578, 22616, 22645, 22674, 22703, 22732, 22761, 22805, 22834, 22872, 22901, 22930, 22959, 22988, 23017, 23046, 23075, 23131, 23160, 23189, 23218, 23247, 23276, 23305, 23334, 23363, 23392, 23421, 23450, 23625, 24137, 24181, 24220, 24333, 24362, 24391, 24420, 24451, 24480, 24565, 24594, 24643, 24718, 24756, 24785, 24863, 24950, 24979, 25008, 25038, 25068, 25102, 25153, 25207, 25236, 25448, 25497, 25726, 25755, 25784, 25813, 25842, 25871, 25900, 25929, 25958, 25987, 26016, 26045, 26074, 26103, 26132, 26161, 26190, 26219, 26248, 26277, 26307, 26342, 26371, 26584, 26699, 26731, 26774, 26817, 26846, 26875, 26904, 26933, 26964, 26993, 27025, 27054, 27083, 27136, 27165, 27194, 27223, 27252, 27284, 27313, 27342, 27371, 27400, 27429, 27458, 27580, 27705, 27739, 27762, 27812, 27843, 27907, 28206, 28296, 29111, 29113, 29229, 29235, 29237, 29238, 29240, 29241, 29582, 29622, 30021, 30102, 30185

2.50 POLICY EN10: ENERGY

Overview

Policy EN10 should be read in conjunction with strategic policy SP9 which focuses upon climate change, environmental sustainability and resource use and policy HO9 Housing Standards. Its purpose is to provide a practical policy framework to support a move to a lower carbon future, although it is recognised that further technical evidence is required in relation to aspects of the policy to support the next edition of the plan.

In total, **155** representations from **154** respondents were submitted in relation to the contents of Policy EN10. These were received from local residents, Town/Parish Councils, local/sub-regional environmental groups, elected members, a sub-regional body (West Yorkshire Combined Authority), Government agencies/bodies (Historic England, Natural England), a development industry representative, developers and agents.

Table 2.50.1: Question 48 - Policy EN10: Energy - Summary of Representations Received

Consultation Question 48 - Policy EN10: Energy				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
155	**154**	**149**	**2**	**4**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Retrofitting • Green Belt • Policy strength • Retrofitting • Standards • Supplementary Planning Document (SPD) • Thresholds • Heating	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy CR3: Renewable and Low Carbon Energy in the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Cumulative Assessment • Environmental appraisal • Monitoring • Standards • Zero Carbon Infrastructure	

Summary of Representations
Objections:
1. Retrofitting • The policy on net zero emissions and high levels of energy efficiency do not apply to existing developments. Will the council be able to apply such standards immediately prior to adoption given the large developments that are already proposed. The existing housing stock should be considered in these policies for retrofitting. Such an approach on existing housing and public buildings will reduce the dependence of new developments on fossil fuels.
2. Green Belt • The new road and housing plans directly affect a Grade II listed house and land.
3. Policy strength • Policy is welcomed but could be strengthened to ensure the delivery of zero carbon emissions by 2038. • Lack of encouragement for this policy.
4. Standards • Refer to the Merton Local Plan which requires the highest standards of sustainable design and construction. This approach is advocated.
5. Supplementary Planning Document (SPD) • A sustainable construction checklist SPD should be prepared.
6. Thresholds • There is a contradiction within the policy between maximising improvements in energy conservation and the threshold for meeting zero carbon standards being for developments of 50 dwellings or more.

Summary of Representations
7. Heating • There should be a hierarchy for dictating the source for communal heating. There is no specific policy on heating. • Policy should include a point which states "Houses should not be being built that lock homeowners into the gas network for heating."
8. Cumulative Assessment • Approach requiring an assessment of environmental impacts arising from proposals for major renewable and low carbon energy generation schemes to fully consider any cumulative landscape and visual impacts, and to demonstrate that they will have no adverse impact on the integrity of the South Pennine Moors SPA/SAC is welcomed.
9. Environmental appraisal • The supporting text needs to make clear that the appraisal of environmental impacts also includes consideration of potential impacts on the historic environment. Reword paragraph 4.43.31 to read: "Policy EN10 therefore requires that applicants fully appraise the environmental impacts (including those on the historic environment) and identify any mitigation."
Support:
1. Monitoring • There should be an audit of greenhouse gases to measure progress of the plan to reduce CO_2 emissions.
2. Cumulative Assessment • Approach requiring an assessment of environmental impacts arising from proposals for major renewable and low carbon energy generation schemes to fully consider any cumulative landscape and visual impacts is welcome.
Comments:

Summary of Representations
1. Standards • An amendment to encourage higher standards and identification of sites which have the potential to be example schemes of sustainability would support market building for zero carbon homes. • The policy is setting a target ahead of the Government target for net zero carbon by 2050. The HBF supports moving toward greater energy efficiency via a nationally consistent set of standards and timetable for achieving these. Although the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 preventing councils from stipulating energy performance standards that exceed buildings regulations, the HBF considers that the key to success is standardisation and avoidance of different local area approaches to energy efficiency, which would undermine economies of scale for product manufacturers, suppliers and developers. The Government wants to create certainty and consistency and an uplift to Part L standards will improve energy efficiency of new homes and prepare housebuilders and supply chains for a further uplift in 2025.
• The policy wording in relation to providing site wide heating and cooling systems 'where reasonable and practical' is welcomed in recognition of the practicalities of providing such systems - particularly due to site size and specific characteristics. Requirements for connection to wider district heating and cooling networks, achievement of zero net-carbon emissions and Future Homes Standard by 2025, should also only be where practical and viable to ensure onerous requirements do not undermine otherwise successful and sustainable schemes.
2. Zero Carbon Infrastructure • Call for sites for renewable and local carbon options and technical work is welcomed and aligns with the West Yorkshire Devolution Deal. • Renewable potential / potential capacity was assessed in AECOM's 'Low Carbon and Renewable Energy Capacity in Yorkshire and Humber (2011). There is a need for increased renewable generation in West Yorkshire to meet the regional net-zero carbon target. Although Policy EN10 acknowledges this, there is a lack of clarity on the spatial or quantitative integration of zero carbon emissions infrastructure.

Representation IDs: 1928, 3053, 3712, 5945, 9819, 15772, 16730, 19776, 19812, 19873, 21829, 21903, 21932, 21961, 21990, 22019, 22048, 22080, 22109, 22138, 22167, 22207, 22236, 22265, 22294, 22323, 22352, 22381, 22492, 22521, 22550, 22579, 22617, 22646, 22675, 22704, 22733, 22762, 22806, 22835, 22873, 22902, 22931, 22960, 22989, 23018, 23047, 23076, 23132, 23161, 23190, 23219, 23248, 23277, 23306, 23335, 23364, 23393, 23422, 23451, 23626, 24138, 24182, 24221, 24334, 24363, 24392, 24421, 24452, 24481, 24566, 24595, 24644, 24719, 24757, 24786, 24864, 24951, 24980, 25009, 25039, 25069, 25103, 25154, 25174, 25208, 25237, 25449, 25498, 25727, 25756, 25785, 25814,

25843, 25872, 25901, 25930, 25959, 25988, 26017, 26046, 26075, 26104, 26133, 26162, 26191, 26220, 26249, 26278, 26308, 26343, 26372, 26585, 26700, 26732, 26775, 26818, 26847, 26876, 26905, 26934, 26965, 26994, 27026, 27055, 27084, 27137, 27166, 27195, 27224, 27253, 27285, 27314, 27343, 27372, 27401, 27430, 27459, 27581, 27706, 27740, 27778, 27813, 27844, 27908, 28207, 28297, 29077, 29078, 29230, 29583, 29623, 30022, 30103, 30186

2.51 POLICY EN11: MINERALS SUPPLY AND LANDBANKS

Overview

Policy EN11 seeks to maintain an adequate supply of minerals (sandstone, sand and gravel, clay) to meet district and regional requirements, in particular the need to maintain the production of high-quality building, roofing and paving stones that the district is known for.

In total, **1** representation from **1** respondent was submitted in relation to the contents of Policy EN11. This was received from a government agency (Historic England).

Table 2.51.1: Question 49 - Policy EN11: Minerals Supply and Landbanks - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
1	1	0	1	0

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Supply of building stone	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy MIN2: Minerals Supply and Landbanks in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
No representations were received in objection.
Support:
1. Supply of building stone: • Bradford District noted as a major supplier of high-quality building stone.

• Policy was supported as it will help to ensure a steady supply of building stone was available for the repair of historic buildings (locally and elsewhere) and new development in sensitive areas. • Proposals to ensure sandstone reserves are primarily use for the supply of building stone and not aggregate use were welcomed.
Comments:
No representations received commenting on the policy.

Representation ID: 29079

2.52 POLICY EN12: MINERALS ALLOCATIONS

Overview

Policy EN12 seeks to protect existing extraction sites that will continue to contribute to the supply of minerals in the district during the plan period, as well as to identify potential new sites or locations.

In total, **5** representations from **3** respondents were submitted in relation to the contents of Policy EN12. These were received from a Parish Council, a local resident and a wildlife trust.

Table 2.52.1: Question 50 - Policy EN12: Minerals Allocations - Summary of Representations Received

Consultation Question 50 - Policy EN12: Minerals Allocations				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
5	**3**	**2**	**0**	**3**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed Area of Search - Bank Top Quarry • Impact on biodiversity/wildlife • Impact on Local Wildlife Sites	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy MIN5: Minerals Allocations in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Proposed Area of Search - Bank Top Quarry:

- The existing quarry has planning permission for a 32 year period covering an area of 13ha (with a working area of 9.1ha due to peripheral constraints)
- No need to make provision for a further extension of 9.8ha to the quarry, with its presumption of planning permission.
- Important that the rate of extraction is not increased by such a presumption, when the long-term need for stone should to be considered.
- Concerns expressed regarding the potential new site and impacts on the restoration of the existing site. Development of the new site should not be seen as a reason to delay the restoration of the original site when once working has ceased.

Support:

No representations received in support.

Comments:

1. Impact on biodiversity/wildlife:

- Disappointment expressed that the Bradford Wildlife Habitat Network (WHN) was not included on the interactive Policies Map to allow consideration of the appropriate location of site allocations.
- Object to the loss of any of the WHN and any allocations that could directly or indirectly impact upon those areas. Must commit to retaining and enhancing the network.

2. Impact on Local Wildlife Sites:

- Specific comments made in relation to three of the proposed safeguarded mineral extraction sites and their identification within the minerals site allocations policy.
- **Buck Park Quarry** encompasses Buck Park Quarry Local Wildlife Site (LWS). Inclusion means that national and local policy cannot be adhered to due to the loss of habitats of significant biodiversity interest.
- **Naylor Hill Quarry** encompasses Brow Moor and Brow Moor with Sugden End Local Wildlife Sites (LWS). Inclusion means that national and local policy cannot be adhered to due to the loss of habitats of significant biodiversity interest.
- **Hainworth Shaw Quarry** lies immediately adjacent to Harden Moor and Deepcliffe Wood Local Wildlife Site (LWS). The LWS should be protected from any direct or direct impacts as a result of minerals extraction.

Representation IDs: 3294, 5641, 11574, 11575. 11576

2.53 POLICY EN13: MINERAL SAFEGUARDING

Overview

Policy EN13 seeks to ensure that key mineral resources within the district are not sterilised by non-mineral development through the use of Mineral Safeguarding Areas (MSAs).

In total of **2** representations from **2** respondents were submitted in relation to the contents of Policy EN13. These were received from two Government agencies/bodies (The Coal Authority; Historic England).

Table 2.53.1: Question 51 - Policy EN13: Mineral Safeguarding - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
2	2	0	2	0

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Coal Mineral Safeguarding Areas (MSA) • Sandstone safeguarding	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy MIN3: Mineral Safeguarding in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
No representations received in objection.
Support:
1. Coal Mineral Safeguarding Area (MSA): • Noted that the MSA identified on the Policies Map will include safeguarding of the district's surface coal resource.

2. Sandstone safeguarding: • Policy elements relating to sandstone safeguarding were supported, in particular criteria B and E. • Bradford District noted as a major supplier of high-quality building stone. • Important that the availability of that resource is not compromised by other developments.
Comments:
No representations received commenting on this policy.

Representation IDs 3939, 29080

2.54 POLICY EN14: MINERALS AREA OF SEARCH

Overview

Policy EN14 seeks to identify potential Areas of Search for sandstone and sand & gravel and sets criteria for doing so.

In total, **1** representation was received from **1** respondent in relation to the contents of Policy EN14. This was received from a Government Agency (Historic England).

Table 2.54.1: Question 52 - Policy EN14: Minerals Area of Search - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
1	1	1	0	0

Headline Summary:	Council's Response:
Representations focused upon the following key issues; • Impact on designated/non-designated heritage assets	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy MIN6: Minerals Areas of Search in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Impact on designated/non-designated heritage assets: • Policy, as drafted, provides no safeguards for heritage assets of national and international importance including non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments (as per NPPF footnote 63)
Support:

No representations received in support.
Comments:
No representations received commenting on this policy.

Representation ID: 29081

2.55 POLICY EN15: MANAGING DEVELOPMENT OF MINERAL SITES

Overview

Policy EN15 will be the overarching policy that against which all proposals for development involving mineral extraction will be tested, irrespective of location. This includes quarries, pits, opencast mines, underground mines and all forms of underground hydrocarbon exploitation. The policy is intended to strike the necessary balance between the promotion of investment in new minerals development and the protection of the District's human and natural resources by offering policy support for sustainable minerals development, which meets key environmental criteria. The criteria set reflect the objectives for environmental protection/ enhancement and prioritisation of previously developed land set out in core policies SP2, SP4 and SP10.

In total, **1** representation was received from **1** respondent in relation to the contents of Policy EN15. This was received from a Government Agency (Historic England).

Table 2.55.1: Question 53 - Policy EN15: Managing Development of Mineral Sites - Summary of Representations Received

Consultation Question 53 - Policy EN15: Managing Development of Mineral Sites				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
1	**1**	**0**	**1**	**0**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Protection of heritage assets and their settings	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy MIN7: Proposals for New or Extended Mineral Sites in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
No representations received in objection.
Support:
1. Protection of heritage assets and their settings: • Inclusion of a reference to heritage assets and their settings in the policy (criterion A3) welcomed. • Will help to ensure that heritage assets are not adversely affected by proposals for new mineral development.
Comments:
No representations received commenting on this policy.

Representation IDs: 29082

2.56 POLICY EN16: MINERAL SITE RESTORATION AND AFTERCARE

Overview

Policy EN16 seeks to ensure that the proper restoration of mineral sites takes place in a timely manner when extraction and operations cease, and that the proposed after use is appropriate to the site and its surroundings. It also seeks to deliver environmental and community benefits. Developers will be encouraged to address restoration and after-use early in the planning process, including when submitting a planning application. Applications should be accompanied by a detailed plan and proposals for the restoration and aftercare, that reflect the proposed after use of the site.

In total, **1** representation from **1** respondent was submitted in relation to the contents of Policy EN16. This was received from a government agency (Historic England).

Table 2.56.1: Question 54 - Policy EN16: Mineral Site Restoration and Aftercare - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
1	1	0	1	0

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Provision of site restoration/aftercare	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy MIN8: Mineral Site Restoration, Aftercare and After-use in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
No representations received in objection.
Support:
1. Provision of site restoration/aftercare: • Policy requirement for proposals for mineral extraction to be accompanied by a detailed plan for site reclamation and restoration, and that restoration should seek to reflect the character of the site and its surroundings was supported.

Comments
No representations received commenting on the policy.

Representation IDs: 29083

2.57 POLICY EN17: ENERGY MINERALS

Overview

Policy EN17 seeks to provide a policy framework for energy mineral development including various stages involved in the exploration, appraisal and production of oil and gas (conventional and unconventional) as well as coal extraction.

In total of **2** representations from **2** respondents were submitted in relation to the contents of Policy EN17. These were received from a local resident and a government agency/body (The Coal Authority).

Table 2.57.1: Question 55 - Policy EN17: Energy Minerals - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
2	2	1	1	0

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Coal extraction	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policies MIN9: Oil and Gas (Hydrocarbon) Exploration and Production and MIN10: Coal Extraction in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Coal extraction: • No way that coal extraction can be made "environmentally acceptable". • Questioned whether any possible benefits could outweigh increasing carbon emissions and accelerating climate change. Considered that the jobs argument could be used to justify coal extraction.

• Coal extraction would be contrary to Council's Climate Emergency declaration and prevent it achieving its target of net zero by 2038. May open up the possibility of legal challenge. • Would contribute to food shortages, mass movement of people, extreme weather events and conflicts it climate targets are not met.
Support:
1. Coal extraction: • Noted that the policy includes criteria on the extraction of coal resources where they would otherwise be sterilised by development proposals
Comments
No representations received commenting on this policy.

Representation IDs: 3058, 3945

2.58 POLICY EN18: WASTE MANGEMENT DEVELOPMENT

Overview

Policy EN18 is single policy that can be applied to all future proposals for new or expanded waste management facilities and sites in Bradford district. It seeks to build on Policy SP12, by providing more detailed policy guidance for developers and communities on where potential facilities may be acceptable and addressing the impacts that may arise from waste management developments, which is a key concern for the Council. It aims to support and encourage the management of waste in line with the Waste Hierarchy

A total of **3** representations were received from **3** respondents in relation to the contents of Policy EN18. These were received from a local resident and two Government agencies (Environment Agency and Historic England).

Table 2.58.1: Question 56 - Policy EN18: Waste Management Development

Number of Representations	Number of Respondents	Object	Support	Comment
3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Green Belt Development in South East Bradford • Support for provision of waste management facilities • Comments on location of waste management development • Impacts on climate change • Correction comment	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy WAS4: Proposals for Waste Management Development in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections:

1. **Green Belt development in South East Bradford:**
   - Objection to Green Belt development in South East Bradford in particular the Tong area.
   - Majority of people disagree with plans for housing and a new road in the area.
   - Development would affect a Grade II Listed Building.
   - Council does not care about the environment and animals that need it.

Support:

1. **Provision of waste management facilities:**
   - Intention that proposals for waste management facilities will be permitted, provided that there is an identified need and it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment was supported
   - Requirement to submit a heritage statement alongside planning applications where proposals affect a heritage asset was supported.

Comments

1. **Location of waste management development:**
   - The proposed hierarchy of locations seems reasonable
   - Suggested that surrounding land use is just as relevant as the development site.
   - Expanding existing sites as well as development of new sites could present host of problems in relation to off-site effects if in proximity to residential or other sensitive receptors, specifically in relation amenity (dust, noise, odour) and impact of any incidents such as fire.
   - NPPF paragraph 182 requires new development to integrated effective with existing businesses and not place unreasonable restrictions upon them.

- Where the operation of an existing permitted facility could have significant adverse effects on new development (including changes of use), the applicant should be required to provide suitable mitigation for these effects.
- Mitigation can be provided through the design of the new development to minimise exposure to the neighbouring permitted facility and/or through financial contributions to the operator of the facility to support measures that minimise impacts.
- Environmental Permitting Regulations require operators to demonstrate that they have taken all reasonable precautions to mitigate the impacts of their operations.
- Regulated sites should be considered within the site allocation methodology and potential allocations directed away from sites which are adjacent/nearby permitted facilities.
- May be useful to have appropriate protocols set out in the Local Plan that the matter of regulated sites and developer requirements in relation to mitigations.

2. Impact of climate change:

- Noted that references are made to minimising the impact of climate change.
- Queried whether this includes imposing a requirement for waste management development to have plans for preventing impacts from materials held on sites in the event of a flood or other extreme weather incident.

3. Correction:

- Queried whether the wording of part 13D of the policy should amended.
- Policy reads "*For new or expanded hazardous waste management sites, it should be demonstrated that it could be processed at an existing facility within the district….*'
- Should this be read "…*could NOT be processed at an existing facility*..".

Representation IDs 3713, 29087, 29243

2.59 POLICY EN19: WASTE MANAGEMENT ALLOCATIONS

Overview

Policy EN19 seeks to identify appropriate sites for waste management facilities. Further work on this will take place.

In total, **3** representations from **3** respondents were submitted in relation to the contents of Policy EN19. These were received from local residents.

Table 2.59.1: Question 57 - Policy EN19: Waste Management Allocations - Summary of Representations Received

Consultation Question 57 - Policy EN19: Waste Management Allocations				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
3	**3**	**3**	**0**	**0**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Energy waste from plant, Keighley (Site EN19.2)	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy WAS2: Waste Management Allocations in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

Summary of Representations
Objections:
1. Proposed development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area.

• Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building. • Council does not care about the environment and animals that need it.
2. Energy waste from plant, Keighley (Site EN19.2): • Objection to the construction of an energy from waste plant on the proposed in Keighley. • Will be detrimental to local residents – astounding it is still being considered and planned for. • Will be issues with air quality, pollution, increased traffic levels and its location – within a valley, close to schools and recreational facilities. • Contrary to other elements of the Plan relating those issues and creation of a healthy city. • Serious concerns raised in relation to air quality
Support:
No representations received in support.
Comments
No representations received in commenting.

Representation IDs: 317, 1093, 3714

2.60 POLICY EN20: SAFEGUARDING EXISTING WASTE MANAGEMENT FACILITIES

Overview

Policy EN20 seeks to safeguarding existing waste management facilities and allocated wastes which are important to the delivery of the waste management hierarchy.

In total, **1** representation from **1** respondent was submitted in relation to the contents of Policy EN20. This was received from a local resident.

Table 2.60.1: Question 58 - Policy EN20: Safeguarding Existing Waste Management Facilities - Summary of Representations Received

Consultation Question 58 - Policy EN20: Safeguarding Existing Waste Management Facilities.				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
1	**1**	**1**	**0**	**0**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Proposed development in South East Bradford	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy WAS3: Safeguarding Waste Management Facilities & Infrastructure in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

Summary of Representations
Objections:
1. Proposed development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area.

• Development would affect a Grade II Listed Building. • Council does not care about the environment and animals that need it.
Support:
No representations received in support.
Comments
No representations received commenting on this policy.

Representation IDs: 3715

2.61 POLICY EN21: WASTE MANAGEMENT WITH DEVELOPMENT

Overview

Policy EN21 sets out the objectives for the construction and operation of development, principally relating to waste management.

In total **3** representations from **3** respondents were submitted in relation to the contents of Policy EN21. These were received from a local resident, an elected member and a government agency/body (Environment Agency).

Table 2.61.1: Question 59 - Policy EN21: Waste Management within Development - Summary of Representations Received

Consultation Question 59 - Policy EN21: Waste Management Within Development				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
3	**3**	**1**	**0**	**2**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Proposed development in South East Bradford • Comments on waste management within development • Comments on management of construction waste • Comments on Reduction of construction and demolition waste • Comments on site management	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy WAS5: Waste Management Within Development in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Proposed development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building. • Council does not care about the environment and animals that need it.
Support:
No representations received in support.
Comments
1. Waste management within development: • Waste management within development and its resulting disposal was a key concern. Queried how it can be addressed through the Local Plan.
2. Management of construction waste: • Noted that construction waste can be problematic in ensuring that it is handled in accordance with all legislation. • Correct reference to the legislation is recommended and consideration given to how the council can influence this in a practical way.
3. Reduction of construction and demolition waste: • Policies that seek to reduce the amount of construction and demolition waste were encouraged. This links to reducing primary aggregate demand and increasing secondary aggregate use in minerals planning.
4. Site management: • Policies that encourage good site management and on-site waste management plans were welcomed.

Representation IDs: 3716, 9820, 29244

2.62 POLICY CO1: OPEN SPACES, SPORT AND RECREATION

Overview

Policy CO1 aims to protect the existing provision of open space, sport and recreation facilities, and only allow the loss of such sites in specific, identified circumstances. It also requires the provision of new open space as part of residential developments to ensure adequate provision for new residents and help to address identified deficiencies. The provision and protection of open space is an important element of sustainable development, with both individual sites and the wider network of spaces.

In total, **25** representations from **22** respondents were submitted in relation to the contents of Policy CO1. These were received from local residents, Town/Parish Councils, elected members, developers, landowners, agents, Government bodies/agencies (Historic England, Natural England; Sport England), an NHS Trust, a playing fields organisation, a neighbourhood association and national heritage organisation (National Trust).

Table 2.62.1: Question 60 - Policy CO1: Open Spaces, Sport and Recreation - Summary of Representations Received

Consultation Question 60 - Policy CO1: Open Spaces, Sport and Recreation				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
25	**22**	**10**	**9**	**6**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Benefits of Greenspace • Green Belt • Promotion of sites • Levels of provision • Golf courses • Open space designation • Standards • Heritage assets	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy NE2: Open Space, Play, Sport and Recreation in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Protection of open space • General support, protection of open space, future provision, standards, enhancement, SPA/SAC recreational pressure • Comments on standards, loss of sports facilities, Indoor Sports Facility Needs Assessment, mitigation, green space need mapping, Recreational pressure on SPA/SAC, Local Green Space designation	

Summary of Representations
Objections:
1. Benefits of Greenspace • Greenspaces are vital for mental and physical wellbeing. Maintaining greenspaces in urban areas can help to offset climate change and pollution. New housing should never be built on green belts or green spaces. Communities and children need space to exercise and breathe.
2. Green Belt • The green belt was set up to stop urban expansion. The new road and housing plans will directly affect a Grade II house and land.
3. Promotion of sites • Some areas like Ilkley Moor are over promoted. Other areas like Baildon moor should be promoted. There needs to be an area developed for off-road use by bicycles, motor bikes, and quad bikes. This would help prevent improper and damaging use elsewhere.
4. Levels of provision • Keighley West has inadequate park recreational areas. Additional areas are not provided by developers.
5. Golf courses • The designation of Queensbury Golf Course is a new proposal. It is not currently designated on the UDP proposals map. There is no evidence to suggest that golf courses should be protected.
6. Open space designation

- Areas designated for Amenity Space and Green Infrastructure on the southern part of the hospital (Airedale) should be removed as the Hospital Trust would not want these designations prevent highways improvements.

- The National Trust has no objection in principle to the open space and recreation designation on the land holdings but inclusion of the buildings and car park are not appropriate. The designation should be amended to remove it across the core of the facilities at East Riddlesden Hall estate.

7. Standards

- It should be for the Council to inform the applicant as to the type and level of open space that is required rather than it being the applicants responsibility to decipher the extent of open space that is required using the standards provided in Appendix 11 and factoring in surpluses and deficiencies. A more suitable approach would be to require a set level of open space per dwelling as this gives clarity to applicants.

8. Heritage Assets

- Criterion A of the policy does not provide sufficient protection to those spaces which contribute to the setting of heritage assets or to local character and distinctiveness. The following wording should be added on from point 3: "and, 4. In all cases, the loss will not result in harm to a heritage asset, including its setting."

9. Protection of open space

- Green spaces should be kept green.

Support:

- **General support**
  - General support for Policy CO1.
  - Support for the policy. Sports and recreation needs to go beyond hard surface sports facilities. Green space is needed for fresh air and walking.

- **Protection of Open Space**
  - Building on greenspaces such as Wycliffe Gardens and replacing it elsewhere is not acceptable.
  - Continue to protect important areas of open space.
  - Support for Point A of the policy but only specific areas of open space should be designated to ensure the policy is appropriate.

- **Future provision**

- General support for the objectives to both maintain and enhance the provision of Open Space, Sport and Recreational facilities. The plan does not give details as to how to ensure the provision of open space, sport and recreation can evolve to meet the developing needs of their communities. Town and parish councils are ideally positioned to effectively engage with all sectors of the community.

- Support the policy - particularly Criterion B3 which allows for the enhancement of existing open spaces where these are likely to be regularly used by the occupants of new development. And Criterion E which indicates the Council will work with communities to identify areas of Local Green Space. The protection and enhancement of these areas will contribute to the delivery of the vision - in relation to the creation of an attractive District and the protection and enhancement of its environmental assets.

- **Standards**
  - The standards should apply to all houses not just new developments. Evey residents should have access to open, natural space within a reasonable distance of their house.

- **Enhancement**
  - Making the best use of existing recreation grounds should be a priority. These are often key green open spaces within settlements. It is important to carry out works to make them better drained and less prone to surface damage. They should be kept within easy walking distance for residents of all ages.

- **SPA/SAC recreational pressure**
  - Natural England considers that the approach set out in policy CO1 is robust and based on up-to-date evidence. The inclusion of the requirement for the mitigation of recreational pressure on the SPA/SAC arising from residential development is welcome but this could be strengthened by the case-by-case consideration of all major proposals for C1, C2 and C4 development and for caravan and campsites. In additional major proposals for purpose-built student accommodation should also be included within this policy in relation to the potential for increased recreational pressure on designated sites arising from this type of development, to be assessed on a case-by-case basis.

Comments:

- **Standards**
  - General support for the principle of the policy in line with NPPF paragraph 97. Welcome the update to the Playing Pitch Strategy. However, there is a move away from the standards approach. The provision of new sport facilities should be identified by the evidence base and could include new provision or enhancements to meet demand. The Sport England's Sport Facility Calculator should be incorporated into the policy.

• **Evidence on loss of sports facilities**   • Evidence needs to be provided in line with NPPF paragraph 97 where an allocation may contain a sports facility which would be lost. The evidence needs to demonstrate whether the facility is surplus to requirements or needs to be replaced. The Playing Pitch Strategy should be used to determine any impact on playing fields.
• **Indoor Sports Facility Needs Assessment**   • An Indoor Sport Facility Needs Assessment will be required to determine any impact that an allocation may have on a built sport facility.
• **Mitigation**   • Allocations which are situated directly adjacent to sports grounds such as cricket clubs need to consider issues of ball strike. Ball stop mitigation will need to be put in place as part of the development. Similar issues relating to noise will also need to considered and suitable mitigation needs to be incorporated.
• **Green space need mapping**   • Fields in Trust believes the protection used by the Council on numerous green spaces since 2010 would guarantee these spaces are protected far beyond the Local Plan's remit. The FiT's strategic need-based mapping work is being viewed with interest. The research illustrates that Bradford would benefit from this approach.
• **Recreational pressure on SPA/SAC**   • Suggested amendments to Policy SP11 will ensure that reference to the provision of new, or improved, open space as having the potential to mitigate recreational pressure on the SPA/SAC is consistent with the provision of Policy SP11.
• **Local Green Space designation**   • Local Green Space designation should be applied to Land at Wycliffe Road, Thompson Street and Moor View Avenue, Shipley.

Representation IDs: 318, 2152, 2533 ,3296, 3717, 3867, ,5654, 9821, 10967, 19690, 19720, 19827, 19874, 23778, 27782, 27911 ,27931, 28530, 29001, 29002, 29090, 29091, 29712, 30126, 30127

2.63 POLICY CO2: COMMUNITY AND HEALTH FACILITIES

Overview

Policy CO2 sets out the Council's approach to support the new or enhanced community infrastructure within the district as well as seeking to ensure that such facilities are not un-necessarily lost. It also seeks provide guidance for new or enhanced facilities.

In total, **7** representations from **7** respondents were submitted in relation to the contents of Policy CO2. These were received from local residents, a cultural body (Theatres Trust), Town/Parish Councils, a neighbouring local authority and a Government agency/body (Sport England).

Table 2.63.1: Question 61 - Policy CO2: Community and Health Facilities - Summary of Representations Received

Consultation Question 61 - Policy CO2: Community and Health Facilities				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
7	**7**	**2**	**1**	**4**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Loss of community facilities/assets • Propose development in South East Bradford • Support for protection of community/cultural facilities • Comments on Village/Community Halls and sporting use, capacity of existing facilities, impact on education provision in Kirklees	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy SC1: Community Facilities and Infrastructure in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. **Loss of community facilities/assets**: • Community assets and facilities have been allowed to be converted to other uses resulting in a loss to the community they served.

- Lack of economic viability cited by developers have not been sufficiently challenged.
- Policy should be re-worded to provide stronger protection for community assets, such as pubs, with a default position of retaining and enhancing them.
- Policy needs to more clearly recognise the need to promote, retain and enhance facilities in local centres and rural areas.

2. Proposed development in South East Bradford:

- Objection to Green Belt development in South East Bradford in particular the Tong area.
- Majority of people disagree with plans for housing and a new road in the area.
- Development would affect a Grade II Listed Building.
- Council does not care about the environment and animals that need it.

Support:

1. Protection of community/cultural facilities:

- Plan's approach to the protection of community and cultural facilities such as theatres and performance venues supported.
- Reflects the need to guard against their loss as set out in the National Planning Policy Framework.

Comments:

1. Village/Community Halls and sporting use:

- Village/community halls noted as being the smallest buildings that can accommodate sports programmes.
- Policy should be amended to include and recognise the sporting use of village halls.

2. Capacity of existing facilities:

- Doctor's and dental surgeries in Baildon are oversubscribed. Further thought must go on how these services can be improved.
- Increase in the housing stock in Cullingworth since 2013 has placed an extra burden on the village's infrastructure. Concerns that existing infrastructure would not have the capacity to cope with increased levels of development. Assurances sought that improvements to infrastructure will be aligned with current and future growth.

3. Impact on education provision in Kirklees:

- Emerging evidence base needs to be reviewed to determine the impact of proposed developments on education provision in the Kirklees Council area.

Representation IDs: 2537, 3237, 3718, 19691, 28584, 29636, 29648

2.64 POLICY CO3: HEALTH IMPACT ASSESSMENTS

Overview

Strategic Policy SP15 sets out a clear 'healthy places framework' for the Local Plan which is interlinked with a wide range of related policies. It highlights the need to effectively evaluate the degree to which development proposals have taken into consideration health and wellbeing through screening and a Health Impact Assessment (HIA). Policy CO3 sets out the criteria for screening and when a HIA will need to be submitted with a planning application.

In total, **7** representations from **7** respondents were submitted in relation to the contents of Policy CO3. These were received from local residents, a resident's group, a restaurant chain, a developer, planning consultants/agents and a Government agency/body (Sport England).

Table 2.64.1: Question 62 - Policy CO3: Health Impact Assessments - Summary of Representations Received

Consultation Question 62 - Policy CO3: Health Impact Assessments				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
7	**7**	**5**	**2**	**0**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Leeds Bradford Airport • Hot Food Takeaways • Health Impact Assessment (HIA) screening requirements and thresholds • Requirement of Health Impact Assessments (HIAs): • Support of Health Impact Assessments (HIAs): • Comment on Active Design principles	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy ST4: Creating Well Designed and Healthy Places in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Proposed development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building. • Council does not care about the environment and animals that need it.
2. Leeds Bradford Airport: • Disappointed that the Council has not taken a stance against the expansion of Leeds Bradford Airport. • Health impacts from aircraft noise were highlighted as being well-understood, alongside the impact on the climate arising from more flights that render carbon targets unachievable. • Council should take climate responsibilities seriously and acknowledge that an expanded airport would impact on the health of many people living in the Bradford area.
3. Hot Food Takeaways: • Policy specifically targeting hot food takeaways rather than all food and drink uses was not supported by research. • Difficult using existing research/mapping to determine whether or not there is a proliferation or concentration of hot food takeaways specifically. • Suggested that evidence points to other uses such as pubs with expanded food provision can often constitute more of a problem.
4. Health Impact Assessment (HIA) screening requirements and thresholds: • Policy did not set out adequate screening criteria for HIAs – only establishing that an HIA would be required in relation to hot food outlets. • Policy sets out a threshold above which an HIA screening would be required but provided no indication of the nature/context of the proposals that would be expected to be accompanied by an HIA. Greater clarity should be provided to make the plan effective.
5. Requirement of Health Impact Assessments (HIAs):

- Intention of Policy SP15 was supported, however the provision of HIAs (as set out in Policy CO3) was considered to be un-necessary requirement.
- Suggested that compliance with health-related policies/themes (in Policy SP15) could be addressed via Planning Policy statements and/or Design and Access Statements.
- Requested that Policy CO3 be deleted.

Support:

1. Support of Health Impact Assessments (HIAs):

- Policy was supported but needed to include measures to address walkability of neighbourhoods and establish how it contributes to social cohesion, e.g. providing bumping spaces.

Comments:

1. Active Design principles:

- Policy was welcomed; however, it was suggested the wording should include reference to Active Design.

Representation IDs: 3719, 3869, 4293, 5732, 18401, 19701, 27817

2.65 POLICY DS1: ACHIEVING GOOD DESIGN

Overview

Policy DS1 seek achieving good design recognising that it requires an inclusive, multi-disciplinary and collaborative approach to help shape the physical setting for urban life and make places better than would otherwise be the case. The policy identifies the importance of getting the process right and supports guidance in the Homes and Neighbourhoods SPD which sets out what is expected at different stages in the evolution of schemes linked to pre-application discussions and community involvement. This includes the need to establish a project brief at the outset which can then inform a design concept or masterplan before the preparation of detailed drawings. The policy is also consistent with the revised NPPF which highlights the value of using appropriate tools and processes to achieve good design.

In total, **6** representations from **5** respondents were submitted in relation to the contents of Policy DS1. These were received from local residents, a Town/Parish Council, a sub-regional body (West Yorkshire Combined Authority) and a Government agency/body (Historic England).

Table 2.65.1: Question 63 - Policy DS1: Achieving Good Design - Summary of Representations Received

Consultation Question 63 - Policy DS1: Achieving Good Design				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
6	**5**	**1**	**3**	**2**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Support engagement with communities • Support design of new housing • Support for policy • Comment on support for policy principle	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy DS1: Design Processes in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections:

1. Proposed development in South East Bradford:

- Objection to Green Belt development in South East Bradford in particular the Tong area.
- Majority of people disagree with plans for housing and a new road in the area.
- Development would affect a Grade II Listed Building.
- Council does not care about the environment and animals that need it.

Support:

1. Engagement with communities:

- Consultation with local communities was considered to be vital. People that live in them should have a say on what happens.

2. Design of new housing:

- Considered that good design needs to look beyond “shoe box” housing with no gardens but room for cars.
- Priorities should be reversed to address this.

3. Support for policy principles:

- Overall objective of the policy that development should aim to achieve good design appropriate to the local community was supported.
- Suggested that where a Neighbourhood Plans develop policies about design, these should be considered as the primary expression of the local design character for the area.
- A fundamental review of the design policies based around the Homes and Neighbourhoods Design Guide SPD and potential changes to national policy/guidance would be supported.

4. Support for policy:

- Policy was supported as it should help to ensure development is of the highest standard and appropriate to its context.
- A number of elements of the policy were particularly welcomed, including references to adopting a holistic and collaborative and putting the quality of place first, design being informed by a good understanding if the site/area and its context, working with local communities/stakeholders, taking opportunities to improve places, and the use of design review (where appropriate).

Comments:

1. Support for policy principles:

- Inclusion of policies relating to urban design was welcomed.
- Ambition to significantly improve quality in housing and neighbourhood design, and to create inclusive, accessible, distinctive and healthy places.
- Noted that the District's high population of children and young people was reflected in policies that prioritise green space, doorstep play and safe routes to play destinations.
- Policy could be further strengthened by including welcoming and safe routes to schools as a requirement.

Representation IDs: 319, 3298, 3720, 15823, 29092, 29093

2.66 POLICY DS2: WORKING WITH THE LANDSCAPE

Overview

Policy DS2 seeks to ensure that development responds positively to those features that can help to create distinctive places which integrate well with their surroundings, as well as reducing their environmental impact. The policy strengthens the need to respond to the District's sloping topography, to reinforce and expand its networks of blue and green infrastructure, and to take opportunities to make developments 'green' through the design of the streets and spaces. This reflects key priorities in the Homes and Neighbourhoods SPD relating to distinctiveness, health and wellbeing, biodiversity and prioritising the environment.

In total, **6** representations from **6** respondents were submitted in relation to the contents of Policy DS2. These were received from local residents, Canal and Rivers Trust and Government agencies/bodies (Historic England, Natural England).

Table 2.66.1: Question 64 - Policy DS2: Working with the Landscape - Summary of Representations Received

Consultation Question 64 - Policy DS2: Working with the Landscape				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
6	**6**	**3**	**2**	**1**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Working with the landscape • Proposed amendments to policy • Support working with local character and natural features • Support responding to context and character • Comments on links to wider landscape and blue infrastructure	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy DS2: Landscape Design in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Proposed development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building. • Council does not care about the environment and animals that need it.
2. Working with the landscape: • Considered that the idea set out in the policy landscape being something that can be worked with was unwelcome. • There are some landscapes, such as the Tong Valley, where integrity and lack of built environment are essential to their quality and where creating new quality green spaces would not be an alternative to destroying existing quality Green Belt land.
3. Proposed amendments to policy: • Policy approach was welcomed however, it was considered that amendments should be made. • Suggested that policy be made more robust by including additional wording relating to the use of appropriate plant species, which reinforce existing and priority ecosystem services identified in Policy EN2. • Policy should also have regard to the National Design Guide (adopted 2019, updated 2021). Includes high level principles regarding design for nature.
Support:
1. Working with local character and natural features: • Existing developments considered to be “identikit” and could be anywhere in the country. • New developments need to work with local character and natural features.
2. Responding to context and character: • Policy supported as it will help to ensure development proposals respond sensitively to their context and, where appropriate, help to reinforce the distinctive character of the area.

Comments:
1. Links to wider landscape and blue infrastructure: • References in policy requiring developments to be linked to the wider landscape and to extend blue infrastructure networks into sites was generally welcomed. • Would help to make the Plan more effective in promoting good design and links to the wider walking and cycling network, including the canal network.

Representation IDs: 3721, 3870, 13585, 13873, 19875, 29094

2.67 POLICY DS3: URBAN CHARACTER

Overview

The urban areas of Bradford benefit from a rich and varied character which contributes to local distinctiveness and a sense of place. Minor additions were proposed to Policy DS3 to further strengthen the priorities in the Homes and Neighbourhoods SPD of making places which are distinctive to the District and of creating attractive green streets and spaces.

In total, **4** representations from **4** respondents were submitted in relation to the contents of Policy DS3. There were received from local residents, a Town/Parish Council and a Government agency/body (Historic England).

Table 0.1: Question 65 - Policy DS3: Urban Character - Summary of Representations Received

Consultation Question 65 - Policy DS3: Urban Character				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
4	**4**	**1**	**3**	**0**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Support provision of street trees • Support for policy principles • Support responding to context and character	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy DS3: Urban Character and Form in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Proposed development in South East Bradford:

• Objection to Green Belt development in South East Bradford in particular the Tong area. • Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building. • Council does not care about the environment and animals that need it.
Support:
1. Provision of street trees: • Provision of street trees within new development was supported.
2. Support for policy principles: • General principles of the policy were supported. • Suggested that where Neighbourhood Plans develop policies and design guides relating to urban character for their areas, these should be considered as the primary expression of the local character.
3. Responding to context and character: • Policy supported as it will help to ensure development proposals respond sensitively to their context and, where appropriate, help to reinforce the distinctive character of the area.
Comments:
No representations received commenting on the policy

Representation IDs: 320, 3300, 3722, 29095

2.68 POLICY DS4: STREETS AND MOVEMENT

Overview

Policy DS4 seeks to ensure that new developments get the movement framework right by creating a network of routes which connect to where people want to go, and which offer choice and a pleasant experience, particularly for those travelling by foot. The policy seeks to further support the priority in the Homes and Neighbourhoods SPD of promoting healthy, active lifestyles and the role street design can play in this, and also to provide additional emphasis on the need to make cycling an attractive travel option on new developments.

In total, **2** representations from **2** respondents were submitted in relation to the contents of Policy DS5. These were received from a local resident and a Town/Parish Council.

Table 2.68.1: Question 66 - Policy DS4: Streets and Movement - Summary of Representations Received

Consultation Question 66 - Policy DS4: Streets and Movement				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
2	**2**	**1**	**1**	**0**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Support for policy principles	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy DS4: Street Design in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Proposed development in South East Bradford: • Objection to Green Belt development in South East Bradford in particular the Tong area.

• Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building. • Council does not care about the environment and animals that need it.
Support:
1. Support for policy principles: • General principles of the policy were supported. • Suggested that the policy should include an additional section supporting locally specific policies for streets and movement within Neighbourhood Plans.
Comments:
No representations received commenting on the policy

Representation IDs: 3302, 3723

2.69 POLICY DS5: SAFE AND INCLUSIVE PLACES

Overview

Policy DS5 identifies the importance of considering this at all scales from the neighbourhood to the streets, the spaces and the buildings, and it further supports the priority for inclusive places in the Homes and Neighbourhoods guide emphasising the needs of older people, those with disabilities and children and providing opportunities for play and community spaces. It is also consistent with the revised NPPF and its expanded section on healthy and safe communities.

In total, **2** representations from **2** respondents were submitted in relation to the contents of Policy DS5. These were received from local residents.

Table 2.69.1: Question 67 - Policy DS5: Safe and Inclusive Places - Summary of Representations Received

Consultation Question 67 - Policy DS5: Safe and Inclusive Places				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
2	**2**	**1**	**1**	**0**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed development in South East Bradford • Definition of safety	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of the revised policies DS1-4 in the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. **Proposed development in South East Bradford:** • Objection to Green Belt development in South East Bradford in particular the Tong area.

• Majority of people disagree with plans for housing and a new road in the area. • Development would affect a Grade II Listed Building. • Council does not care about the environment and animals that need it.
Support:
1. Definition of safety: • When defining safety, it needs to include people's perceptions, i.e. do they feel safe there, not just crime statistics.
Comments:
No representations received commenting on the policy.

Representation IDs: 3724, 3871

2.70 BRADFORD CITY CENTRE

Introduction

The Local Plan settlement hierarchy identifies the City Centre as within the Regional City of Bradford which is the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the district. There is a key focus on transforming its economic, environmental, physical and social conditions to support its long-term regeneration. The City Centre is also identified by the Local Enterprise Partnership as a Spatial Priory Area (SPA) Main Urban Centre for Investment to support growth and regeneration via public sector investment. The SPA designation is also related to the Bradford's selection by Government to receive support from the Transforming Cities Fund and West Yorkshire-plus Transport Fund. The Leeds City Region Transforming Cities Fund programme is a major new programme of investment that aims to deliver transformational, new infrastructure and help create a step change in travel across the region. The City Centre is the key location for employment and new locations for commercial led development have been identified- specifically for grade A office development. It is a major transport hub with good regional transport links with a considerable network of public transport with plans for further improvement including for Mass Rapid Transit (MRT).

The Local Plan has ambitious proposals to increase the current level of homes in the City Centre from just under 2000, with a proposed additional 7,000 through re use of some of the empty buildings in the area, new build and further transformational change in a broad area for growth, "The Southern Gateway". 30 Housing sites were allocated in the City Centre in addition to the sites already with planning permissions in place. A further 3 sites were allocated for employment development.

Portrait & Local Area Strategy

The Local Plan provides Local Area Strategies for 6 neighbourhoods in the City Centre:

- The Central Civic, Business and Leisure District;
- Forster Square, Little Germany and Cathedral Quarter;
- Top of Town (City Village);
- Goitside;
- The Learning Quarter; and
- The Southern Gateway.

These Local Area Strategies set out the key elements which detail how the areas will encourage and support investments and developments in the years to come. The strategies were listed as questions 68-73 within the Preferred Options document and the on-line consultation portal. The City Centre portrait and 6 neighbourhood Local Area Strategies can be viewed on the Council's website.

Summary of Consultation

A total of 10 representations were received in relation to the City Centre portrait and Local Area Strategies were received. Respondents included Heritage England, Highways England, The Bradford Chamber of Commerce and other 3rd parties.
Table 2.70.1 (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in

Table 2.70.2.

Table 2.70.1: Consultation Questions 68-73: Bradford City Centre Portraits & Local Area Strategies - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
68	The Central Civic, Business and Leisure District	1	1	0	0	1
69	Forster Square, Little Germany and Cathedral Quarter	2	2	1	0	1
70	Top of Town - City Village Neighbourhood	2	2	0	1	1
71	Goitside	2	2	0	1	1
72	The Learning Quarter	1	1	0	0	1
73	The Southern Gateway	2	2	1	0	1
	Totals	**10**	**10**	**2**	**2**	**6**

Table 2.70.2: Consultation Questions 68-73: Bradford City Centre Portrait & Local Area Strategy - Summary of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
68	The Central Civic, Business and Leisure District	1	1	0	0	1

Consultation Question 68 – The Central Civic, Business and Leisure District Portrait & Local Area Strategy	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Impact on highway network	• The Council has reviewed the representation made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BCC1: Bradford City Centre, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
No representations in objection received
Support
No representations in support received
Comments
1. Impact on highway network Development within the City Centre is sustainable given its close proximity to transport hubs and networks. Individual sites will be unlikely to have a severe impact on the operation of the strategic road network but cumulatively this will need to be established by the Council and Highways England

Representation IDs: 15414

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
69	Forster Square, Little Germany and Cathedral Quarter	2	2	1	0	1

Consultation Question 69 – Forster Square, Little Germany and Cathedral Quarter Portrait & Local Area Strategy	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Support for improvements to the public realm • The City Centre is considered a sustainable location for development. • Highway network	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BCC1: Bradford City Centre, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Objections

1. Impact on Heritage

- Paragraph 5.1.22 is welcomed which relates to improvements to public realm changes required to the wording of the second key strategic growth directions as follows: *'The sensitive integration of new housing growth within Little Germany and the Cathedral Quarter with strong connectivity to the existing built form.'* Historic England would also welcome involvement in any future improvements to public realm

Support

No representations in support received

Comments

1. Impact on highway network

- Development within the City Centre is sustainable given its close proximity to transport hubs and networks. Individual sites will be unlikely to have a severe impact on the operation of the strategic road network but cumulatively this will need to be established by the Council and Highways England

Representation IDs: 15415, 29096

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
70	Top of Town - City Village Neighbourhood	2	2	0	1	1

Consultation Question 70 – Top of Town – City Village Neighbourhood Portrait & Local Area Strategy	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Support for regeneration of the city centre • The City Centre is considered a sustainable location for development.	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BCC1: Bradford City Centre, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Objections
No representations in objection received
Support
1. Regeneration • The regeneration of the area is overdue and providing a range of tenures close to the city centre will provide a catalyst to further housing growth where infrastructure is in place. Highway issues will need to be addressed and alternative heat networks might also be possible
Comments
1. Impact on highway network • Development within the City Centre is sustainable given its close proximity to transport hubs and networks. Individual sites will be unlikely to have a severe impact on the operation of the strategic road network but cumulatively this will need to be established by the Council and Highways England

Representation IDs: 5263, 15416

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
71	Goitside	2	2	0	1	1

Consultation Question 71 – Goitside Portrait & Local Area Strategy	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Support for improvements to the public realm • The City Centre is considered a sustainable location for development.	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BCC1: Bradford City Centre, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Objections
No representations in objection received
Support
1. Design of development • Support for innovative development which respects and reflects the industrial heritage of the area
Comments
1. Impact on highway network: • Development within the City Centre is sustainable given its close proximity to transport hubs and networks. Individual sites will be unlikely to have a severe impact on the operation of the strategic road network but cumulatively this will need to be established by the Council and Highways England

Representation IDs: 15417, 29097

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
72	The Learning Quarter	1	1	0	0	1

Consultation Question 72 – The Learning Quarter Portrait & Local Area Strategy	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • The City Centre is considered a sustainable location for development.	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BCC1: Bradford City Centre, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Objections
No representations in objection received
Support
No representations in support received
Comments
1. Impact on highway network: Development within the City Centre is sustainable given its close proximity to transport hubs and networks. Individual sites will be unlikely to have a severe impact on the operation of the strategic road network but cumulatively this will need to be established by the Council and Highways England

Representation IDs: 15418

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
73	The Southern Gateway	2	2	1	0	1

Consultation 73 – The Southern Gateway Portrait & Local Area Strategy	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • City Gate (Pheonix Village) should be included within the Southern Gateway regeneration area • The City Centre is considered a sustainable location for development. • Highway network	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BCC1: Bradford City Centre, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Objections
1. Site Allocation • The City Gate (Phoenix Village) site on Park Road represents a key regeneration opportunity and should be included in the Southern Gateway boundary and as a consequence the boundary of the area should be redrawn to accommodate this site.
Support
No representations in support received
Comments
1. Impact on highway network: • Development within the City Centre is the sustainable given its close proximity to transport hubs and networks. Individual sites will be unlikely to have a severe impact on the operation of the strategic road network but cumulatively this will need to be established by the Council and Highways England

Representation IDs: 5638, 15420

Sites

As highlighted above, 33 sites were put forward in the Preferred Options document to meet the proposed development requirements for the Canal Road Corridor area. Under Q74 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of 160 representations were received in relation to the housing sites proposed in the City Centre from 150 respondents. Respondents included local residents, Highways England, Heritage England, the Environment Agency and Natural England. **Table 2.70.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 702.70.4**.

Table 2.70.3: Bradford City Centre Proposed Site (CC1/H – CC33/E) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC1/H - Fulton Street/Sunbridge Road	3	3	0	0	3
CC2/H - Former Bee Hive Mills, Smith Street	3	3	0	1	2
CC3/H - Listerhills Road	2	2	0	1	1
CC4/H - Cathedral Quarter B	2	2	0	1	1
CC5/H - Sun Street	1	1	0	0	1
CC6/H - Midland Mills, Valley Road	3	3	0	1	2
CC7/H - Thornton Road south	2	2	0	1	1
CC8/H - 179 Sunbridge Road	2	2	0	1	1
CC9/H - Tetley Street	2	2	1	0	1
CC10/H - Land and buildings south of Sunbridge Road	3	3	1	0	2
CC11/H - Wigan Street	2	2	0	1	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC12/H - City Village Top of Town	4	4	2	0	2
CC13/H - George Street B	4	4	1	1	2
CC14/H - Thornton Road/Water Lane	2	2	0	1	1
CC15/H - Area west of Valley Road	4	4	1	1	2
CC16/H - North Brook Street, Valley Road	3	3	1	0	2
CC17/H - High Point	2	2	1	0	1
CC18/H - Buildings on Canal Road and Bolton Road	3	3	0	1	2
CC19/H - 16-18 Mill Street	3	3	0	1	2
CC20/H - Thornton Road North	2	2	1	0	1
CC21/H - Burnett Street Car Park	3	3	1	0	2
CC22/H - East Parade Car Park	2	2	1	0	1
CC23/H - Land West of Wharf Street	3	3	0	1	2
CC24/H - Cathedral Quarter A	2	2	1	0	1
CC25/H - Land to the rear of Cathedral House	3	3	0	1	2
CC26/H - Gate Haus 2	2	2	0	1	1
CC27/H - Stone Street	2	2	0	1	1
CC28/H - Land and buildings east of Grattan Road	3	3	0	1	2

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC29/H - Former college Old Building, Great Horton Road	3	3	1	0	2
CC30/H - 496 Leeds Road	1	1	0	0	1
CC31/E - Prince's Way / One City Park	4	4	2	1	1
CC32/E - Former Jacobs Well, Nelson Street	2	2	0	0	2
CC33/E - Exchange Court / Vicar Lane	2	2	1	0	1
Totals	**160**	**150**	**59**	**52**	**49**

Table 702.70.4: Bradford City Centre Proposed Sites (CC1/H – CC33/E) - Summary of Representations Received

CC1/H - Fulton Street/Sunbridge Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC1/H - Fulton Street/Sunbridge Road	3	3	0	0	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk and drainage • Heritage and conservation	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H217 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations in objection received
Support:
No representations in support received
Comments:
1. Flood risk/drainage:

Summary of Representations
• Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development. If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)
2. Heritage and Conservation • Site falls within the Goitside conservation area and is adjacent to the Colonial Buildings (grade II listed). The development of the site could harm elements which contribute toward the significance of these designated heritage assets. We welcome the development constraints and opportunities identified for the site which will enhance the historic environment. If there are any changes that are significantly different to the site's circumstances since the adoption of the AAP (developable area/density/scale of development) the Council should undertake a Heritage Impact Assessment of the site. • A correction is needed to the location of Colonial buildings in the text and Heritage Impact Assessment required
3. Site Viability • No clear evidence exists on viability- site has heritage, build cost implications and is in a flood risk area

Representation IDs: 28805, 29116, 29935

CC2/H - Former Bee Hive Mills, Smith Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC2/H - Former Bee Hive Mills, Smith Street	3	3	0	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition of constraints and opportunities within the heritage environment • Flood risk – site lies within Flood Zones 2 and 3 (3a/3b) • Site viability	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H225 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

No representations in objection received

Support:

1. Conservation Area

- Site lies in the Goitside conservation area where development could harm elements of the heritage asset. We welcome the development constraints and opportunities identified for the site which will enhance the historic environment.

Comments:

1. Flood Risk/drainage

- Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development.

• If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)
2. Site Viability • City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged.

Representation IDs: 28806, 29118, 29936

CC3/H - Listerhills Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC3/H - Listerhills Road	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition of constraints and opportunities within the heritage environment • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H232 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

No representations in objection received

Support:

1. **Conservation Area**
    - Site lies in the Goitside conservation area where development could harm elements of the heritage asset. We welcome the development constraints and opportunities identified for the site which will enhance the historic environment
    - Support welcomed

Comments:

1. **Flood risk/drainage:**
    - The site is located in Flood Zone 1 (FZ1).
    - Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28807, 29120

CC4/H - Cathedral Quarter B

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC4/H - Cathedral Quarter B	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition of constraints and opportunities within the heritage environment • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H233 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No representations in objection received

Support:

1. **Heritage and Conservation Area**
   - Site lies in the Cathedral Precinct conservation area and adjacent to the Ring o Bells public house which is a grade II listed building with a number of other listed buildings nearby. The development of the site could harm elements of these heritage asset. We welcome the development constraints and opportunities identified for the site which will enhance the historic environment. If there are any significant changes to the sites circumstances since the adoption of the AAP (developable area/density/scale of development) the Council should undertake a Heritage Impact Assessment of the site

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28808, 29121

CC5/H - Sun Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC5/H - Sun Street	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H234 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations in objection received
Support:
No representations in support received
Comments:
1. Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28809

CC6/H - Midland Mills, Valley Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC6/H - Midland Mills, Valley Road	3	3	0	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition of constraints and opportunities within the heritage environment • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided • Site viability – no evidence of viability	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H235 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations in objection received
Support:
1. Heritage and Conservation • The site contains part of the grade II listed Ambler Mills and Midland Mills warehouses and adjoins Conditioning House. The development of the site could harm elements of these heritage assets. We welcome the development constraints and opportunities identified for the site which will enhance the historic environment. If there are any significant changes to the sites circumstances since the adoption of the AAP the Council should undertake a Heritage Impact Assessment of the site
Comments:
1. Flood Risk/drainage

• Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development. • If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)
2. Site Viability • City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The heritage aspect of the buildings together with flood risk will have severe cost implications- no evidence that that the site is viable

Representation IDs: 28810, 29126, 29937

CC7/H - Thornton Road south

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC7/H - Thornton Road south	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition of constraints and opportunities within the heritage environment • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H236) is not carried forward as a preferred option and excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

No representations in objection received

Support:

1. **Conservation Area**
   - Site lies in the Goitside conservation area where development could harm elements of the heritage asset. We welcome the development constraints and opportunities identified for the site which will enhance the historic environment

Comments:

1. **Flood Risk/drainage**
   - Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development.

- If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)

Representation IDs: 28811, 29127

CC8/H - 179 Sunbridge Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC8/H - 179 Sunbridge Road	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition of constraints and opportunities within the heritage environment • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant outline / full / hybrid planning permission.

Objections:

No representations in objection received

Support:

1. **Conservation Area**
   - Site lies in the Goitside conservation area where development could harm elements of the heritage asset. Since the allocation of the site in the AAP the buildings have been demolished, hence reference to the listed buildings can be removed.
   - The Development Considerations wording on the proforma requires amendment

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28812, 29133

CC9/H - Tetley Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC9/H - Tetley Street	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage impact - Site proforma should reflect the AAP • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H238 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Conservation Area**
   - The site lies in the Goitside conservation area and contains non designated heritage assets in the north-east and south-west corners- The Sun Hotel and The cottage. The site proforma should reflect the AAP and be amended to read "*The building line of new development should follow all four edges of the site to define the surrounding streets*"

Support:

No representations in support received

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28813, 29136

CC10/H - Land and buildings south of Sunbridge Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC10/H - Land and buildings south of Sunbridge Road	3	3	1	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition of constraints and opportunities within the heritage environment • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided • Site viability – no evidence of viability	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H218 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Heritage and Conservation**
   - Before allocating this site for development, an assessment needs to be undertaken of the contribution which the site makes to the significance of the conservation area and listed buildings in the vicinity. If it is considered that the development of the site would harm elements which contribute to the significance then measures by which the harm might be removed or reduced will need to be tied into the Local Plan. If at the end of the process it is concluded that development will cause harm then the site should not be allocated unless there is a clear public benefit in doing so.
   - Comments made on wording in the site proforma

Support:

No representations in support received

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).

• Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.
2. Site Viability • No clear evidence exists on viability- site has heritage, build cost implications. No proposals have come forward on the site to date

Representation IDs: 28814, 29137, 29938

CC11/H - Wigan Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC11/H - Wigan Street	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition of constraints and opportunities within the heritage environment • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H219 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No representations in objection received

Support:

1. **Heritage and Conservation Area**
   - The site is adjacent to the boundary of the Goitside conservation area. The development of the site could harm elements of these heritage assets. We welcome the development constraints and opportunities identified for the site which will enhance the historic environment

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28815, 29138

CC12/H - City Village Top of Town

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC12/H - City Village Top of Town	4	4	2	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site is considered 'too' strategic for housing' • Site should be used for outdoor entertainment uses • Support recognition of constraints and opportunities within the heritage environment • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided • Site viability – no evidence of viability	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H220 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. Proposed site allocation

- The site is too strategic to be used for housing. There will be no demand and will end up being built to a poor standard. The site instead should be used for outdoor entertainment uses which could cater for 500 people to be used for music, dance, market space as a "top of town activity space"

2. Heritage and Conservation

- Before allocating this site for development, an assessment needs to be undertaken of the contribution which the site makes to the significance of the conservation area and listed buildings in the vicinity. If it is considered that the development of the site would harm elements which contribute to the significance, then measures by which the harm might be removed or reduced will need to be tied into the Local Plan. If at the end of the process it is concluded that development will cause harm, then the site should not be allocated unless there is a clear public benefit in doing so.

Support:

No representations in support received
Comments:
1. Site Viability • City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The heritage aspect of the buildings together with an existing car park will have severe cost implications, leaseholders/freeholders. No evidence that that the site is viable as no applications have come forward

Representation IDs: 2876, 28816, 29139, 29939

CC13/H - George Street B

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC13/H - George Street B	4	4	1	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site is not considered suitable for housing • Site should be used for an exhibition centre • Principle of development set out in the AAP – any changes would require a HIA to be undertaken. • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided • Site viability – no evidence of viability	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H221) is not carried forward as a preferred option and excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

1. Proposed site allocation

- The site is not the right place for housing, instead it could be used to bring more footfall into the city such as for an exhibition centre to host events. It is ideally located close to the ring road and multi storey car parking which would bring in more value to the city than housing and would complement the leisure exchange

Support:

1. Heritage and conservation area

- The site is opposite the Little Germany conservation area and there are a number of listed buildings nearby. The development of the site could harm elements which contribute to the significance of these designated heritage assets. The principle of allocating the site for housing has already been established in the AAP and the comments made in the site proforma are welcomed. If the land use changes or the site density/developable area is changed significantly a heritage impact assessment will be required

Comments:

1. Flood Risk/drainage

• Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development. • If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)
2. Site Viability • City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The site is within the flood zone and in use as a car park where an earlier application was not delivered. No evidence that that the site is viable

Representation IDs: 2884, 28817, 29142, 29940

CC14/H - Thornton Road/Water Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC14/H - Thornton Road/Water Lane	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Principle of development set out in the AAP – any changes would require a HIA to be undertaken. • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided • Site viability – no evidence of viability	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H132) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

No representations in objection received

Support:

1. Heritage and conservation area

- The site is opposite the Little Germany conservation area and there are a number of listed buildings nearby. The development of the site could harm elements which contribute to the significance of these designated heritage assets. The principle of allocating the site for housing has already been established in the AAP and the comments made in the site proforma are welcomed. If the land use changes or the site density/developable area is changed significantly a heritage impact assessment will be required

Comments:

1. Flood Risk/drainage

- Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development.
- If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)

Representation IDs: 28818, 29143

CC15/H - Area west of Valley Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC15/H - Area west of Valley Road	4	4	1	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site is not considered suitable for housing • Site should be used for a museum • Principle of development set out in the AAP – any changes would require a HIA to be undertaken. • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided • Site viability – no evidence of viability	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H222) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

1. Proposed site allocation

- The site is too good to be used for housing and should instead be used for development which will bring more footfall to the city such as and indoor/outdoor museum or outdoor lido

Support:

1. Heritage and conservation area

- The site is located between the city centre and Cathedral precinct conservation areas and there are a number of listed buildings nearby. The development of the site could harm elements which contribute to the significance of these designated heritage assets. The principle of allocating the site for housing has already been established in the AAP and the comments made in the site proforma are welcomed. If the land use changes or the site density/developable area is changed significantly a heritage impact assessment will be required

Comments:

1. Flood Risk/drainage • Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development. • If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)
2. Site Viability • City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The site is within the flood zone and in use as a car park where an earlier application was not delivered. No evidence that that the site is viable for residential development

Representation IDs: 2867, 28819, 29144, 29941

CC16/H - North Brook Street, Valley Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC16/H - North Brook Street, Valley Road	3	3	1	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site proforma requires amendments to the constraints and opportunities / development considerations • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided • Site viability – no evidence of viability	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H223 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. Heritage and Conservation

- The Constraints and opportunities/Development Considerations wording on the proforma requires amendment.

Support:

No representations in support received

Comments:

1. Site Viability

- City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The site is within the flood zone and in use as a car park where an earlier application was not delivered. No evidence that that the site is viable

2. Flood Risk/drainage

- Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development.

- If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)

Representation IDs: 28820, 29145, 29942

CC17/H - High Point

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC17/H - High Point	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site proforma requires amendments to the constraints and opportunities / development considerations • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided • Site viability – no evidence of viability	Since the consultation on the Regulation 18 Local Plan was undertaken, this site has now been developed out and is in residential/other use and is therefore no longer allocated in the Plan.

Objections:

1. **Heritage and Conservation**
   - Objection to the wording of the proforma with suggested new wording requested to refer to archaeological remains

Support:

No representations in support received

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28822, 29146

CC18/H - Buildings on Canal Road and Bolton Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC18/H - Buildings on Canal Road and Bolton Road	3	3	0	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition heritage asset in site proforma • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided • Site viability – no evidence of viability	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant outline / full / hybrid planning permission.

Objections:

No representations in support received

Support:

1. Heritage and conservation area

- The site is located within the Cathedral Precinct conservation area and contains the Lloyds Building which is grade II listed and other non-designated warehouse buildings. We welcome the comments in the site proforma which will alert future developers of the importance of the listed buildings and ensure they are not harmed by the development proposals

Comments:

1. Flood Risk/drainage

- Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development.

• If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)
2. Site Viability • City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The site has heritage issues with severe build cost implications and there is no evidence that that the site is viable

Representation IDs: 28823, 29147, 29943

CC19/H - 16-18 Mill Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC19/H - 16-18 Mill Street	3	3	0	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition heritage asset in site proforma • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided • Site viability – no evidence of viability	Since the consultation on the Regulation 18 Local Plan was undertaken, this site has now been developed out and is in residential/other use and is therefore no longer allocated in the Plan.

Objections:

No representations in objection received

Support:

1.Heritage and conservation area

- The site comprises 16 and 18 Mill Street a grade II listed building and lies in the Cathedral Precinct conservation area. The development could harm elements which contribute to the significance of the heritage asset. We welcome the comments in the site proforma which will alert future developers of the importance of the listed buildings and ensure they are not harmed by the development proposals

Comments:

1. Flood Risk/drainage

- Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development.

• If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)
2. Site Viability • City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The site is in a flood zone and is in use as a car park. It also has heritage/build cost implications and there is no evidence that that the site is viable

Representation IDs: 28824, 29148, 29944

CC20/H - Thornton Road North

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC20/H - Thornton Road North	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objection to the wording in site proforma • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided	• Since the Regulation 18 consultation, this site has been split into two sites: H226 and H1493. • Since the consultation on the Regulation 18 Local Plan was undertaken, site H226 now has extant outline / full / hybrid planning permission. • The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that site H1493 is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

1. Heritage and Conservation

- Objection to the wording of the proforma with suggested new wording requested

Support:

No representations in support received

Comments:

1. Flood Risk/drainage

- Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development.
- If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)

Representation IDs: 28825, 29149

CC21/H - Burnett Street Car Park

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC21/H - Burnett Street Car Park	3	3	1	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage - Objection to wording in site proforma • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided • Site viability – no evidence of viability	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H227) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

1. **Heritage and Conservation**
   - Objection to the wording of the proforma with suggested new wording requested

Support:

No representations in support received

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

2. **Site Viability**

- City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The site also has heritage/build cost implications and there is no evidence that that the site is viable

Representation IDs: 28826, 29151, 29945

CC22/H - East Parade Car Park

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC22/H - East Parade Car Park	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage - Objection to wording in site proforma • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H228) is not carried forward as a preferred option and excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

1. **Heritage and Conservation**
   - Objection to the wording of the proforma with suggested new wording requested

Support:

No representations in support received

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).
     Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28827, 29153

CC23/H - Land West of Wharf Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC23/H - Land West of Wharf Street	3	3	0	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition heritage asset in site proforma • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided • Site viability – no evidence of viability	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H229 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No representations in objection received

Support:

1. Heritage and Conservation

- The site is adjacent to the Cathedral Precinct conservation area and close to 29 Canal Road which is a grade II listed building. The development could harm elements which contribute to the significance of the heritage asset. We welcome the comments in the site proforma which will alert future developers of the importance of the listed buildings and ensure they are not harmed by the development proposals. If there are any changes in circumstances to change the development proposed such as density/scale/developable area etc then the Council should undertake a Heritage Impact Assessment

Comments:

1. Flood Risk/drainage

• Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development. • If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)
2. Site Viability • City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The site also has heritage/build cost implications and there is no evidence that that the site is viable

Representation IDs: 28828, 29154, 29946

CC24/H - Cathedral Quarter A

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC24/H - Cathedral Quarter A	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage - Objection to wording in site proforma • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H230 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Heritage and Conservation**

   Objection to the wording of the proforma with suggested new wording requested

Support:

No representations in support received

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28829, 29155

CC25/H - Land to the rear of Cathedral House

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC25/H - Land to the rear of Cathedral House	3	3	0	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition heritage asset in site proforma • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided • Site viability – no evidence of viability	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H157) is not carried forward as a preferred option and excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

No representations in objection received

Support:

1. Heritage and Conservation

- The site is within the Little Germany conservation area and opposite the cathedral church of St Peter a grade I listed building. There are also other grade II listed buildings in the area. The development could harm elements which contribute to the significance of the heritage asset. We welcome the comments in the site proforma which will alert future developers of the importance of the listed buildings and ensure they are not harmed by the development proposals. If there are any changes in circumstances to change the development proposed such as density/scale/developable area etc then the Council should undertake a Heritage Impact Assessment

Comments:

1. Flood risk/drainage:

• The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.
2. Site Viability • City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The site also has heritage/build cost implications and there is no evidence that that the site is viable

Representation IDs: 28833, 29156, 29947

CC26/H - Gate Haus 2

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC26/H - Gate Haus 2	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition heritage asset in site proforma • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H159) is not carried forward as a preferred option and excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

No representations in objection received

Support:

1. **Heritage and Conservation**

   The site is within the Little Germany conservation area close to a number of listed buildings. The development could harm elements which contribute to the significance of the heritage asset. We welcome the comments in the site proforma which will alert future developers of the importance of the listed buildings and ensure they are not harmed by the development proposals. If there are any changes in circumstances to change the development proposed such as density/scale/developable area etc then the Council should undertake a Heritage Impact Assessment NB: the AAP reference for the site is CH1.11 not M1.3

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28835, 29157

CC27/H - Stone Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC27/H - Stone Street	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition heritage asset in site proforma • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H160) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

No representations in objection received

Support:

1. Heritage and Conservation

- The site is within the City Centre conservation area and adjacent to a number of grade II listed buildings including the Register Office. The development could harm elements which contribute to the significance of the heritage asset. We welcome the comments in the site proforma but if there are any changes in circumstances to change the development proposed such as density/scale/developable area etc then the Council should undertake a Heritage Impact Assessment

Comments:

1. Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required

Representation IDs: 28836, 29159

CC28/H - Land and buildings east of Grattan Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC28/H - Land and buildings east of Grattan Road	3	3	0	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support recognition heritage asset in site proforma • Flood risk – site lies within Flood Zone 2 and 3 – mitigation measures are required and provided • Site viability – no evidence of viability	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H231 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No representations in objection received

Support:

2. Heritage and Conservation

- The site is within the Goitside conservation area and contains Hollins Mill a key non designated asset. The development could harm elements which contribute to the significance of the heritage asset. We welcome that the AAP site has been extended to include the mill which contributes to the conservation area and reference that development proposals should respond sensitively to the surrounding historic context.

Comments:

1. Flood Risk/drainage

• Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development. • If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)
2. Site Viability • City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The site also has heritage/build cost implications and there is no evidence that that the site is viable

Representation IDs: 28838, 29160, 29948

CC29/H - Former college Old Building, Great Horton Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC29/H - Former college Old Building, Great Horton Road	3	3	1	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage assessment required • Flood risk – site lies within Flood Zone 1 – mitigation measures are required and provided • Site viability – no evidence of viability	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H171 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. Heritage and Conservation

- Before allocating this site for development, an assessment needs to be undertaken of the contribution which the site makes to the significance of the conservation area and listed buildings in the vicinity. If it is considered that the development of the site would harm elements which contribute to the significance then measures by which the harm might be removed or reduced will need to be tied into the Local Plan. If at the end of the process it is concluded that development will cause harm then the site should not be allocated unless there is a clear public benefit in doing so.

Support:

No representations in support received

Comments:

1. Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).

• Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required
2. Site Viability • City Centre sites carry risk and may not be able to deliver the quantum of housing envisaged. The site also has heritage/build cost implications. Even with planning permission in place, concern that the site will not reach its appropriate benchmark value

Representation IDs: 28839, 29161, 29949

CC30/H - 496 Leeds Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC30/H - 496 Leeds Road	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – site lies within Flood Zone 1– mitigation measures are required and provided	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H173) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:
No representations in objection received
Support:
No representations in support received
Comments:
1. Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required

Representation IDs: 28840

CC31/E - Prince's Way / One City Park

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC31/E - Prince's Way / One City Park	4	4	2	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Valuable open space, development would impact heritage and the environment around City Hall	• Since the consultation on the Regulation 18 Local Plan was undertaken, this site has now been developed out and is in employment use and is therefore no longer allocated in the Plan.

Objections:

1. Open Space

- This is valuable open space and is consistent with the landscaping of City Park and any high rise building would detract from the historic and environmental footprint of City Hall
- Access should be taken from Hall Ings

Support:

No representations in support received

Comments:

No comments received

Representation IDs: 3457, 16539, 28802, 29109

CC32/E - Former Jacobs Well, Nelson Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC32/E - Former Jacobs Well, Nelson Street	2	2	0	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – site lies within Flood Zone 2 and 3 mitigation measures are required and provided	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as E13) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

No representations in objection received

Support:

No representations in support received

Comments:

1. Flood Risk/drainage

- Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development.
- If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)

Representation IDs: 28803, 29110

CC33/E - Exchange Court / Vicar Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CC33/E - Exchange Court / Vicar Lane	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact of development on conservation area and Grade I Listed Building • Flood risk – site is located in Flood Zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as E14) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

1. **Heritage and Conservation**
   - The site is opposite the city centre conservation area and close to the City Hall a grade I listed building. The development of the site may harm elements which contribute to the significance of the heritage assets. The principle of allocating this site has been established in the AAP but if there are any changes in circumstances to change the development proposed such as density/scale/developable area etc then the Council should undertake a Heritage Impact Assessment. Additional comments relating to the wording in the site proforma suggested

Support:

No representations in support received

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).

- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required

Representation IDs: 28804, 29112

70.7 In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 74 within the consultation document.

Summary of Consultation

70.8 A total of **5** representations were received in relation to Question 74 from **4** respondents. Respondents included Highways England, a local resident, the Chamber of Commerce and a developer. **Table 2.70.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 2.70.6**.

Table 2.70.5: Consultation Question 74: Bradford City Centre Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q74	5	4	2	1	2

Table 2.70.6: Consultation Question 74: Bradford City Centre Preferred Site Allocations - Summary of Representations Received

Consultation Question 74 – Bradford City Centre Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Support for the principle, however need for a balanced approach to support employment opportunities • Impact on highway network • A balance of housing mix is required.	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

Summary of Representations
Objections
1. Principle of development • Support for the extension of the city centre into the Southern Gateway but there needs to be a more balanced approach which supports employment generation in addition to the scale of new homes proposed. 3 new employment sites is not sufficient to maximise the economic opportunity of the NPR station. Existing employment sites will need to be protected together with new additional sites
Support
1. Principle of development • Support for development in the city centre as it supports the centre and avoids development on green fields
Comments
1. Impact on highway network • Development within the City Centre is the sustainable given its close proximity to transport hubs and networks. Individual sites will be unlikely to have a severe impact on the operation of the strategic road network but cumulatively this will need to be established by the Council and Highways England
2. Principle of development • Concern that future new homes in the city will be apartments- more balanced housing mixes should be considered. A step change will need to be encouraged to deliver an improved local environment to attract families to the city

Representation IDs: 15421, 18162, 25252, 25253, 29934

2.71. BRADFORD NORTH EAST

Introduction

The Local Plan settlement hierarchy identifies Bradford North East as one of the four quadrant areas within the wider Regional City of Bradford. This means that, along with the other quadrant areas (Bradford North West, Bradford South East and Bradford South), Bradford City Centre, the Canal Road Corridor and Shipley, it will be the prime focus housing, employment, shopping, leisure, education, health and cultural activities and facilities within Bradford District. It will see the greatest proportion of development and growth over the Local Plan period.

The Bradford North East area includes the wards of Bowling and Barkerend (part), Bolton and Undercliffe, Bradford Moor (majority), Eccleshill, Idle and Thackley and Windhill and Wrose (majority).

Based on this, it is proposed that the Regional City has a housing target of 20,075 dwellings, of which 1,850 were proposed for the Bradford North East area, consisting of sites that benefit from planning permission, where construction has yet to commence, or those that are currently under construction and will be delivered within the Local Plan period, and new site allocations. 82.32ha of new employment land (41.4ha of which was proposed for Bradford North East).

Portrait & Local Area Strategy

The Local Plan provides a portrait of Bradford North East's key characteristics, and for the purposes of supporting community/neighbourhood approach to future development strategy, sets out a series of Local Area Strategies for different sub-areas within the wider Bradford North East area:

- Wrose, Thackley and Idle
- Undercliffe and Eccleshill
- Barkerend
- Apperley Bridge/Esholt Strategic Employment site.

These were listed as questions 75 to 78 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategies can be viewed on the Council's website.

Summary of Consultation

A total of **70** representations were received in relation to the Bradford North East portrait and the Local Area Strategies for its sub-areas (Questions 75 to 78) from **61** respondents. Respondents included local residents, a Green Belt campaign group, a Government Agency/Body (Highways England), a Ward Councillor, Ward Councillors from an neighbouring local authority, developers, landowners, and planning consultants **Table**

71.1 (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in

Table 71.2.

Table 71.1: Consultation Questions 75 to 78: Bradford North East Portrait & Local Area Strategies - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
75	Local Area Strategy – Wrose, Thackley and Idle	60	52	5	44	11
76	Local Area Strategy – Undercliffe and Eccleshill	4	3	3	0	1
77	Local Area Strategy - Barkerend	1	1	0	0	1
78	Local Area Strategy – Apperley Bridge/Esholt Strategic Employment Area	5	5	3	1	1
	Totals	**70**	**61**	**11**	**45**	**14**

Table 71.2: Bradford North East Portrait & Sub-Areas Local Area Strategies - Summary of Representations Received

Consultation Question 75 – Wrose, Thackley and Idle Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
75	Local Area Strategy – Wrose, Thackley and Idle	60	52	5	44	11

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objections to release of Green Belt sites • Focus should be on brownfield land • Impact on infrastructure and local services • Impact on biodiversity • Support for retail designations • Cumulative impact on Strategic Road Network	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BNE1: Bradford North East which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections

Development on green belt:

- There should be no development on the green belt. The area has already been decimated by large scale housing estates with no appropriate infrastructure.
- The use of brownfield land should be maximised first, of which there were numerous examples across the District.
- Green belt sites should be removed from the plan.
- Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed.
- Idle Moor is well used green space and should be protected from development.

Summary of Representations
Impact on local infrastructure/services: • Current road and social infrastructure cannot meet the additional demand from recent new developments.
Wildlife and Biodiversity • Concerns raised regarding the loss of green fields and green belt land and likely implications on environment, wildlife, drainage and flooding.
Support
Area characterisation: • Agree with the characterisation of Bradford NE.
Open space: • Support the proposed keeping of as much green belt and green open space as possible for the health and wellbeing of the residents.
Retail centre designation: • Support the designation of district and local centres and hope this and relevant policy approach will improve diversity and viability of centres and help facilitate regeneration schemes including public realm improvements and protection of heritage buildings.
Comments
Impact on SRN: • Highways England- It is not considered that locating development within Bradford North East, on their own, will have a severe impact on the capacity, operation and safety of the SRN, and this will be identified through the transport evidence base. However, the quantum of sites forms part of a wider cumulative impact within the Bradford North East Area and the rest of the development aspirations within the Plan could severely impact the SRN, and this cumulative impact will need to be established by the Council and considered by Highways England.

Representation IDs: 7, 10, 236, 493, 1609, 2591, 2634, 2972, 2984, 2988, 2998, 3000, 3004, 3050, 3312, 3820, 3843, 3899, 3958, 3986, 3991, 4023 ,4060, 4139, 4267, 4278, 4649, 4658, 4782, 4785, 4822, 4880 ,4882, 4890, 4971, 5020, 5033, 5038, 5039, 5127, 5149, 5363,5400, 5438, 5566, 5602, 5627, 5630, 5648, 5676, 11913, 15422, 19620, 29004, 29005, 29006, 29007, 29008, 29013,
29014

Consultation Question 76 – Undercliffe and Eccleshall Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
76	Local Area Strategy – Undercliffe and Eccleshill	4	3	3	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Improvements needed to open spaces • Objections to release of Green Belt sites • Cumulative impact on the Strategic Road Network	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BNE1: Bradford North East which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
Improvement to open space: • The former allotment gardens in Oxford Road/Park Cliffe Road should be restored as a useful open space, e.g. a nature reserve or be incorporated into an extended Peel Park.
Development on green belt: • Greenbelt buffer between Bradford and Leeds should be maintained especially in areas adjacent to the Leeds boundary in Fagley and Apperley Bridge. No exceptional circumstances have been demonstrated by Bradford City Council to justify development in these locations.
Support
No representations received in support.
Comments

Summary of Representations
Open space: • Many of the designated 'open space' are in fact school playing fields, and as such, not accessible to the general public.
Impact on SRN: • Highways England- It is not considered that locating development within Bradford North East, on their own, will have a severe impact on the capacity, operation and safety of the SRN, and this will be identified through the transport evidence base. However, the quantum of sites forms part of a wider cumulative impact within the Bradford North East Area and the rest of the development aspirations within the Plan could severely impact the SRN, and this cumulative impact will need to be established by the Council and considered by Highways England.

Representation IDs: 2242, 2244, 12467, 15423

Consultation Question 77 – Barkerend Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
77	Local Area Strategy - Barkerend	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Cumulative impact on the strategic road network	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BNE1: Bradford North East which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
No representations received in objection
Support
No representations received in support.
Comments
Impact on SRN: • Highways England- It is not considered that locating development within Bradford North East, on their own, will have a severe impact on the capacity, operation and safety of the SRN, and this will be identified through the transport evidence base. However, the quantum of sites forms part of a wider cumulative impact within the Bradford North East Area and the rest of the development aspirations within the Plan could severely impact the SRN, and this cumulative impact will need to be established by the Council and considered by Highways England.

Representation IDs : 15424

Consultation Question 78 – Esholt Strategic Employment Area Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
78	Local Area Strategy – Apperley Bridge/Esholt Strategic Employment Area	5	5	3	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objections to the release of Green Belt sites • Support for area strategy • Cumulative impact on the strategic road network	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BNE1: Bradford North East which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections

Development on green belt:

- The use of brownfield land should be maximised before green belt
- Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed.

- NE22/E and NE23/E should not be allocated as employment land and Draft Policy EC1 part D should be omitted (i.e. to omit sites NE22/E and NE23/E as employment allocations) and the proposals map amended accordingly.

Support

Area strategy:

- Support the area strategy for Esholt and agree that NE22/E and NE23/E should be considered in combination in order to best utilise the land and for future operation.

Summary of Representations
Comments
Impact on SRN: • Highways England- It is not considered that locating development within Bradford North East, on their own, will have a severe impact on the capacity, operation and safety of the SRN, and this will be identified through the transport evidence base. However, the quantum of sites forms part of a wider cumulative impact within the Bradford North East Area and the rest of the development aspirations within the Plan could severely impact the SRN, and this cumulative impact will need to be established by the Council and considered by Highways England.

Representation IDs : 494, 15425, 17118, 18074, 29715

Sites

As highlighted above, 24 sites were put forward in the Preferred Options document to meet the proposed development requirements for Bradford North East (21 for residential and 3 for employment). Under Q79 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **82** representations were received in relation to policies NE1/H to NE21/H and NE22/E to NE24/E from **79** respondents. Respondents included Government agencies/bodies (Environment Agency and Historic England), local residents, a Ward Councillor, a waterways body (Canal and River Trust), a countryside charity, landowners, planning consultants, developers and a neighbouring local authority. **Table 71.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in

Table 71.4.

Table 71.3: Bradford North East Proposed Sites (NE1/H to NE21/H and NE22/E to NE24/E) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE1/H: Ravenscliffe Avenue, Ravenscliffe	1	1	0	0	1
NE2/H: Westfield Lane and Kingsway, Wrose	6	4	4	0	2
NE3/H: Westfield Lane (Rear Kingsway), Wrose	2	2	0	0	2
NE4/H: Simpsons Green	6	6	4	0	2
NE5/H: Prospect Road	3	3	1	1	1
NE6/H: Exmouth Place	1	1	0	0	1
NE7/H: Barkerend Mill, Barkerend Road	3	3	1	1	1
NE8/H: Old Park Road, Thorpe Edge	2	2	1	0	1
NE9/H: Arthur Street, Idle	1	1	0	0	1
NE10/H: Ravenscliffe Avenue, Ravenscliffe	2	2	1	0	1
NE11/H: Harrogate Road, Greengates	17	17	16	0	1
NE12/HC: Kings Drive, Wrose	1	1	0	0	1
NE13/H: Rawson Avenue, Thornbury	1	1	0	0	1
NE14/H: Joseph Street, Barkerend	2	2	1	0	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE15/H: Hinchliffe Street	1	1	0	0	1
NE16/H: Kyme Mills, Napier Terrace	2	2	0	1	1
NE17/H: Steadman Street, Barkerend	1	1	0	0	1
NE18/H: Rimswell Holt, Ravenscliffe	1	1	0	0	1
NE19/H: Land east of Harrogate Road, Greengates	6	6	4	1	1
NE20/HC: Site of Ashfield Mills	2	2	1	0	1
NE21/H: Blakehall Works, Bradford Road, Idle	2	2	1	0	1
NE22/E: Walkhill Farm, Apperley Lane	9	8	3	1	5
NE23/E: Apperley Bridge/Esholt (Former Filter Beds – Water Treatment Works)	8	8	3	2	3
NE24/E: Land at Gain Lane and Woodhall Road	2	2	1	0	1
Totals	**82**	**79**	**42**	**7**	**33**

Table 71.4: Summary of Representations Received – Bradford North East Sites (NE1/H to NE21/H and NE22/E to NE24/E)

NE1/H: Ravenscliffe Avenue, Ravenscliffe

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE1/H: Ravenscliffe Avenue, Ravenscliffe	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site in Flood zone 1	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H587 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection
Support:
No representations received in support.
Comments:
Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs : 28781

NE2/H: Westfield Lane and Kingsway, Wrose

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE2/H: Westfield Lane and Kingsway, Wrose	6	4	4	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Concerns about impact on services and infrastructure • Impact on highways • Impact on local wildlife • Concerns about flood risk – Flood zone 1 • Existing strain on local amenities	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H681 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

Impact on local services / infrastructure:

- Development would have an impact on local infrastructure, including schools, health centre and other amenities.
- The only access can be achieved via Kingway which would risk the loss of much needed sports and recreation facility for North East Bradford e.g. the playing fields, football club and table tennis facilities.

Impact on local highway:

- Concerns about the impact on local roads (congestion, rat-runs, access and highway safety).

Impact on local wildlife and environment:

- Concern was raised about the impact to the areas character, wildlife and environment.

Support:

No representations received in support.
Comments:
Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.
Local Amenities: • Existing developments in these areas already putting a strain on local facilities. • It is important to retain and improve the quality of open spaces and sports facilities in the area and support for the creation of new natural and formal open spaces together with improved connections between open areas.

Representation IDs: 4518, 5983, 28782, 29025, 30203, 30205

NE3/H: Westfield Lane (Rear Kingsway), Wrose

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE3/H: Westfield Lane (Rear Kingsway), Wrose	2	2	0	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1 • Existing strain on local amenities	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H590 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations received in objection
Support:
No representations received in support.
Comments:
Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.
Local Amenities: • Existing developments in these areas already putting a strain on local facilities.

- It is important to retain and improve the quality of open spaces and sports facilities in the area and support for the creation of new natural and formal open spaces together with improved connections between open areas.

Representation IDs: 28783, 30204

NE4/H: Simpsons Green

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE4/H: Simpsons Green	6	6	4	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Concerns about impact on the highways • Concerns about flood risk due to surface water run off • Proximity to and impact on heritage assets	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H682 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
Impact on local highway: • Concerns about the impact on local roads (congestion, canal crossing, property access, highway and pedestrians safety).
Flooding/drainage: • Concerns raised about the potential impacts of surface runoff, flooding and pollution to adjacent land.
Proximity to/impact on heritage assets: • Listed building located within the vicinity of the site.

- An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building and conservation area.
- Development could harm elements that contribute to the significance of the listed building and conservation area.
- The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

Support:

No representations received in support.

Comment:

The Canal & River Trust advises that any development considerations should include the following-

- Contextual information to demonstrate that the development will not result in land instability (suggested text)
- Development does not damage any underground watercourse
  resulting in localised flooding as records show that there is a culvert below the site
- Mitigation is required to reduce the impact of the development on the canal and listed building.
- Design principles should be developed based on strengthening the established buffer between site and canal that could include further investigation of contextual considerations, constraints, landscape, and an understanding of the canal side setting and heritage.
- A landscape visual impact assessment would be required to recognise the value of the setting of canal and lock
- Development proposal should seek to retain existing vegetation on the bank and require the provision of biodiversity assessments and enhancement strategies for the site.

Representation IDs : 8, 2329, 13586, 28784, 29027, 29166

NE5/H: Prospect Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE5/H: Prospect Road	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Suggested site allocation amendment • Support for recognition of heritage assets • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H683 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

Site allocation:

- Adjoining school building should be demolished and used for either immunity or an extension to site NE5/H

Support:

Heritage:

- Welcome the inclusion of a reference to the proximity of the site to designated heritage assets (Grade II buildings) and that any development should be sensitive to the setting and take account of their significance.

Comment:

Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 2238, 28785, 29167

NE6/H: Exmouth Place

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE6/H: Exmouth Place	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – Flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H684 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations received in objection
Support:
No representations received in support.
Comment:
Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28786

NE7/H: Bakerend Mill, Barkerend Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE7/H: Barkerend Mill, Barkerend Road	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proximity to heritage assets • Support for the site allocation • Flood risk – Flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H599 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

Proximity to/impact on heritage assets:

- Listed building located within the vicinity of the site.
- An assessment should be undertaken to determine the contribution the site makes to those elements which contribute to the significance of the listed building and conservation area.
- Development could harm elements that contribute to the significance of the listed building and conservation area.
- The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

Support:

Site Allocation:

- Supports redevelopment of Barkerend Mill for residential use

Comment:

Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 16477, 28787, 29168

NE8/H: Old Park Road, Thorpe Edge

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE8/H: Old Park Road, Thorpe Edge	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objection to site allocation • Flood risk – Flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H685 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

Site Allocation:

- Should be removed from the allocation of housing and identified as green spaces for re-wilding and the development of sustainable drainage systems

Support:

No representations received in support.

Comment:

Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28788, 29029

NE9/H: Arthur Street, Idle

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE9/H: Arthur Street, Idle	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood Risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H686 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations received in objection
Support:
No representations received in support.
Comment:
Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28789

NE10/H: Ravenscliffe Avenue, Ravenscliffe

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE10/H: Ravenscliffe Avenue, Ravenscliffe	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objection to site allocation • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H673 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

Site Allocation:

- Should be removed from the allocation of housing and identified as green spaces for re-wilding and the development of sustainable drainage systems

Support:

No representations received in support.

Comment:

Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28790, 29030

NE11/H: Harrogate Road, Greengates

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE11/H: Harrogate Road, Greengates	17	17	16	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objection to site allocation • Flood risk – flood zone 1 • Impact on local highway • Impact on local services and infrastructure • Impact on views and vistas • Impact on wildlife	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H674 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

Site Allocation:

- Should be removed from the allocation of housing and identified as green spaces for re-wilding and the development of sustainable drainage systems

Impact on local highway:

- Concerns about the impact on local roads (congestion, crossing, thru traffic, volume of traffic, property access, highway and pedestrians safety).

Flood risk/drainage:

- Concerns raised regarding surface water drainage, and the potential impacts of flooding and pollution to adjacent land

Local services / infrastructure:

- Development would not be supported by existing local infrastructure, including schools, shops and other key infrastructure e.g. bus services, broadband etc

Impact on views/vistas:

- Development would have an impact on the views and vistas in this area.
- Potential intrusive development impacting on existing properties.

Impact on nature and wildlife:

- Concerns about the loss of habitats for wildlife, including bats and foxes.
- Potential negative impact on the character of the nearby woodland and beck.
- Decreased access to local green space impacting on wellbeing.

Support:

No representations received in support.

Comment:

Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 525, 1381, 2473, 2479, 2485, 2487, 2493, 2495, 2497, 2502, 2512, 2517, 2519, 2545, 2583, 28791, 29032

NE12/HC: Kings Drive, Wrose

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE12/HC: Kings Drive, Wrose	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H607 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations received in objection
Support:
No representations received in support.
Comment:
Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28792

NE13/H: Rawson Avenue, Thornbury

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE13/H: Rawson Avenue, Thornbury	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H675 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations received in objection
Support:
No representations received in support.
Comment:
Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28793

NE14/H: Joseph Street, Barkerend

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE14/H: Joseph Street, Barkerend	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on heritage asset • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H676 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

Impact on heritage asset:

- The site lies opposite Feversham Street First School, a Grade II* The development of this area could harm elements which contribute to the significance of this designated heritage asset. Any development proposals for this area would need to ensure that those elements which contribute to the significance of this heritage asset are not harmed.

Support:

No representations received in support.

Comment:

Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28794, 29169

NE15/H: Hinchliffe Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE15/H: Hinchliffe Street	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H677 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations received in objection
Support:
No representations received in support.
Comment:
Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28795

NE16/H: Kyme Mills, Napier Terrace

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE16/H: Kyme Mills, Napier Terrace	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support identification as a non-designated heritage asset • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H678 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No representations received in objection

Support:

Heritage asset:

- Historic England support the identification of Kyme Mills as a non-designated heritage asset. and the intention that the conversion of these buildings for residential use should be undertaken creatively and sensitively in recognition of their historic nature.

Comment:

Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28796, 29170

NE17/H: Steadman Street, Barkerend

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE17/H: Steadman Street, Barkerend	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H679 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations received in objection
Support:
No representations received in support
Comment:
Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28797

NE18/H: Rimswell Holt, Ravenscliffe

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE18/H: Rimswell Holt, Ravenscliffe	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H680 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations received in objection
Support:
No representations received in support
Comment:
Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28798

NE19/H: Land east of Harrogate Road, Greengates

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE19/H: Land east of Harrogate Road, Greengates	6	6	4	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objection to site allocation • Impact on local highway • Flood risk – flood zone 2 and 3 • Impact on nature and wildlife • Support for the site allocation from one respondent	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H636 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
Site Allocation: • Should be removed from the allocation of housing and concentrate on brownfield areas for house building.
Impact on local highway: • Concerns about the impact on local roads (congestion, network capacity, impact on junctions, speeding traffic).
Flood risk/drainage: • Concerns raised regarding surface water drainage, and the potential impacts of flooding and pollution to adjacent land
Impact on nature and wildlife: • Concerns about the loss of habitats for wildlife,
Support:
Site allocation:

- General support for the site allocation and provided detailed development considerations that the agent would consider during construction e.g. access, improvements to surface water flooding, sensitive design and layout etc.

Comment:

Flood risk/drainage:

- Flood Zones 2, 3 and the current/draft 3b/3a(i) within site boundary
- Guidance provided on limitation of development types and appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 2546, 2562, 2582, 5491, 17160, 28799

NE20/HC: Site of Ashfield Mills

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE20/HC: Site of Ashfield Mills	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local highway • Impact on local services and infrastructure • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H647 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

Impact on local highway:

- Concerns about the impact on local roads (congestion, rat-runs, volume of traffic, property access, highway and pedestrians safety).

Impact on local services / infrastructure:

- Development would have an impact on local infrastructure, including schools and health centre.

Support:

No representations received in support

Comment:

Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 2335, 28800

NE21/H: Blakehill Works, Bradford Road, Idle

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE21/H: Blakehall Works, Bradford Road, Idle	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local highway • Impact on local services and infrastructure • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H658 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

Impact on local highway:

- Concerns about the impact on local roads (speeding, volume of traffic, highway and pedestrians safety).

Impact on local services / infrastructure:

- Development would have an impact on local infrastructure, including community centre, schools and health centre.

Support:

No representations received in support

Comment:

Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 2584, 28801

NE22/E: Walkhill Farm, Apperley Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE22/E: Walkhill Farm, Apperley Lane	9	8	3	1	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Loss of open space • Esholt Strategic Employment Area • Site NE23/E • Site Allocation • Draft Policy EC1 • Evidence Base • General support • Flood risk/drainage • Climate change • Development Framework • Trees • General comments	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as E20) is not carried forward as a preferred option and excluded

Objections:

Loss of Open Space

- Number of empty employment sites around the area. Another green open space that will be taken from the area. Particularly relevant since pandemic and how businesses will operate in future.

Esholt Strategic Employment Area (SEA)

- At 31.55 ha representing 45% of the total employment land supply, disproportionate to the overall distribution of employment land, the nature/sector of the uses indicated, and the suitability of the location for large numbers of HGV movements.

Site NE23/E

- currently subject to a planning application does not therefore require an allocation to deliver employment development of an appropriate nature.

Site Allocation

- no justification for the allocation of site NE22/E (4.94 ha)
- assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Conservation Area and Listed Buildings
- measures by which that harm might be removed or reduced need to be effectively tied into the Plan.
- If concluded development will harm Conservation Area and any listed buildings site should not be allocated unless benefits outweigh harm (NPPF)

Draft Policy EC1

- part D should be omitted (i.e. to omit sites NE22/E and NE23/E as employment allocations) and the proposals map amended accordingly.

Evidence Base

- needs to be an assessment of what contribution this area makes to those elements which contribute to the significance of these heritage assets and what effect the loss of this site and its subsequent development might have upon their significance.

Support:

General Support

- Support for allocation of sites NE22/E and NE23/E and agree with indicative site areas and capacities
- suggest that a better form of development would be achieved if an element of class C3 residential development was included in the allocation.

Comment:

Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Climate Change

- Site presents a major opportunity to deal with the threat from climate change and pollution of seas/waterways.

Development framework

- more like an advertising specification than how it will make a real contribution to the planet's health. Council must do more to ensure this is what it will achieve.

Trees

- Extensive tree canopy providing visual amenity must be protected.

General comments

- housing proposed with significant environmental benefits. Providing developers develop the scheme to the standards stated then we are supportive.
- This site sits at the entrance to the Strategic Employment Site at Esholt. It can only be brought forward for development if it forms part of the overall master-plan.
- Sites have an ongoing planning application on them which Leeds City Council are in dialogue on.
- Council have prepared a Local Area Strategy and Plan for the Apperley Bridge/Esholt (Former Filter Beds – Waste Water Treatment Works)Client owns site NE23/E but have no control over site NE22/E and the Council must note that no agreement is in place to develop these sites collectively and site NE22/E must demonstrate that it can be accessed and developed independently of our Clients site.

Representation IDs: 2320, 17119, 18078, 28778, 29021, 29024, 29163, 29671, 29714

NE23/E: Apperley Bridge/Esholt (Former Filter Beds – Water Treatment Works)

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE23/E: Apperley Bridge/Esholt (Former Filter Beds – Water Treatment Works)	8	8	3	2	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • General objections • Draft Policy EC1 • Evidence base • Heritage • General support • Flood risk/drainage • Climate change • Development framework • Trees • General comments	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as E23) is not carried forward as a preferred option and excluded

Objections:

General Objections

- This site is a perfect opportunity to enhance the area by turning it back into a natural environment, extending the green

open spaces around Esholt, which are accessible from the area. already exists a business area in this locality.

- The SEA is located approximately 10km from the motorway network (M606)
- Sites NE22/E and NE23/E do not serve to meet the demand from occupier businesses and inward investors for

employment development sites that are located close to the motorway network.

- currently subject to a planning application does not therefore require an allocation to deliver employment development of an appropriate nature.

Draft Policy EC1

- part D should be omitted (i.e. to omit sites NE22/E and NE23/E as employment allocations) and the proposals map amended accordingly.

Evidence Base

- underpinning the Plan there needs to be an assessment of what contribution this area makes to those elements which contribute to the significance of these heritage assets

Heritage

- An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building and conservation area.
- Development could harm elements that contribute to the significance of the listed building and conservation area.
- The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

Support:

General Support

- support the allocation of sites NE22/E and NE23/E and agree with the indicative site areas and capacities.
- landowner has demonstrated through the live planning application ref: 19/02504/MAF that the site is suitable, available and achievable and represents a deliverable site.
- proposed allocation does not included the land which is currently being proposed for the vehicular access to serve NE23/E and we would advise that the boundary is revised to safeguard an area around the proposed access route
- Esholt development is hugely important to the Council and it is essential that it is allocated in order for the Council to
- meet their employment targets over the plan period.

Comment:

Flood Risk/drainage

- Flood Zones 2, 3 and the current/draft 3b/3a(i) within site boundary
- Guidance provided on limitation of development types and appropriate flood mitigation measure and surface water discharge rates that would be required.

Climate Change

- Site presents a major opportunity to deal with the threat from climate change and pollution of seas/waterways.

Development framework

• more like an advertising specification than how it will make a real contribution to the planet's health. Council must do more to ensure this is what it will achieve.
Trees • Extensive tree canopy providing visual amenity must be protected.
General comments • housing proposed with significant environmental benefits. Providing developers develop the scheme to the standards stated then we are supportive. • Other key sites the plan proposes to allocate will result in encroaching into the green belt: NE22 and NE23/E – Apperley Bridge/Esholt. • These sites have an ongoing planning application on them which Leeds City Council are in dialogue with.

Representation IDs: 2325, 17120, 18079, 28779, 29022, 29165, 29673, 29713

NE24/E: Land at Gain Lane and Woodhall Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NE24/E: Land at Gain Lane and Woodhall Road	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • General objections • Flood risk/drainage	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as E156) is not carried forward as a preferred option and excluded

Objections:

General Objections

- development of this site is supported for employment uses, it is considered to be a committed site that was granted planning permission prior to the Plan Period (in December 2017) and not to constitute new supply i.e. being available for new employment development.
- Draft Policy EC1 part B/1 should be amended to omit site NE24/E 'Land at Gain Lane and Woodhall Road' as this site is committed and being delivered, thereby not forming the supply of new employment land. As this site is indicated to deliver 9.85 ha of employment land this area will need to be re-provided at an alternative site(s).

Support:

No representations

Comment:

Flood risk/drainage

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 18081, 28780

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 79 within the consultation document.

Summary of Consultation

A total of **8** representations were received in relation to Question 79 from **8** respondents. Respondents included local residents, planning consultants, a Government agency/body (Highways England), a housebuilder and landowners/developers. **Table 71.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 71.6**.

Table 71.5: Consultation Question 78: Bradford North East Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q179	8	8	6	0	2

Table 71.6 –Bradford North East Preferred Site Allocations - Summary of Representations Received

Question 79 – Bradford North East Preferred Site Allocations

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q79	8	8	6	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objections to development on Green Belt • Support brownfield first approach • Should not be allocated for employment • Objections to rejected sites • Impact on strategic road network	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

Summary of Representations

Objections

Development on green belt:

- The use of brownfield land should be maximised first, of which there were numerous examples across the District.
- Green belt sites should be removed from the plan.
- Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed.

Site Allocation:

Summary of Representations
• NE22/E and NE23/E should not be allocated as employment land and Draft Policy EC1 part D should be omitted (i.e. to omit sites NE22/E and NE23/E as employment allocations) and the proposals map amended accordingly.
Rejected Sites: • Object to the failure to allocate NE/062 for housing, arguing that it is well connected to existing community and perfect for small developers and/or self-builder. • Object to the failure to allocate the Land at Lower Fagley for housing, arguing that it is adjacent to newly constructed residential development and the land has limited value for agricultural uses. • Object to the failure to allocate NE/128 for housing, arguing that the site is available (in the control of a housebuilder) and suitable for development as there are no constraints that cannot be addressed or mitigated for. Also it's located in a settlement which hosts a wide range of services and facilities to support new residential community. • Object to the failure to allocate NE/053 for housing, arguing that there is no procedural reason to reject a suitable brownfield site detached from the boundary of the sub-area. The exceptional level of design and sustainability that the development is proposing will further justify the sites release from the Green Belt.
Support:
Comments
Impact on SRN: • Highways England- It is not considered that locating development within Bradford North East, on their own, will have a severe impact on the capacity, operation and safety of the SRN, and this will be identified through the transport evidence base. However, the quantum of sites forms part of a wider cumulative impact within the Bradford North East Area and the rest of the development aspirations within the Plan could severely impact the SRN, and this cumulative impact will need to be established by the Council and considered by Highways England.

Representation IDs: 495, 723, 5025, 15426, 17069, 18080, 29716, 30129

2.72 BRADFORD SOUTH EAST

Introduction

The Local Plan settlement hierarchy identifies Bradford South East as one of four quadrant areas within the wider Regional City of Bradford. It includes the wards of Tong and Wyke and parts of Little Horton, Wibsey, Bowling and Barkerend. It is considered to be a sustainable urban area with good transport connections within the wider area and beyond via the M606 and M62 motorways and Low Moor railway station with access to the wider City and beyond to Leeds, Halifax and Huddersfield. It also accommodates a number of key areas for employment and as such it will help make a significant contribution of the meeting the District's housing needs, employment and providing supporting community facilities. Based on this it is proposed that the settlement has a housing target of 2,200 dwellings and over 37 hectares of open market employment land. A total of 48 site allocations (35 residential and 13 employment) were proposed to deliver these development requirements.

Portrait & Local Area Strategy

The Local Plan provides a portrait of the Bradford South East's characteristics and sets out a Local Area Strategy for its future growth and development, the key elements of which include:

- Delivering at least 2,200 homes over the plan period (2020 to 2038) on a mix of committed sites and new allocations comprising of 26 greenfield sites and 9 previously developed/mixed sites. 20 of the sites are within the settlement and 6 fall within the current Green Belt

- Delivering 37.15ha of employment land located on 13 sites (SE32/E to SE44/E) to support the wider employment land target for the district and the provision of local jobs. It would also support potential expansion for a local business.

The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of 1,608 representations were received in relation to the Bradford South East spatial portrait and Local Area Strategy (Questions 80 to 84) from 1,577 respondents. Respondents included Highways England, Historic England, National Grid, local residents, landowners, a house builder and local Ward Councillors. **Table 2.72.1 Error! Reference source not found.**(below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in

Table 2.72.2.

Table 2.72.1: Bradford South East Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
80	Bowling	2	2	1	0	1
81	Low Moor and Wyke	6	6	2	1	3
82	Bierley	7	7	3	2	2
83	Holmewood	1563	1536	1558	0	5
	Totals	**1578**	**1551**	**1563**	**3**	**10**

Table 2.72.2: Bradford South East Portrait & Local Area Strategy - Summary of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
80	Bowling	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Highway Infrastructure	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BSE1: Bradford South East, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Comments:
1. Highway Infrastructure • On their own, the proposals will not have a severe impact on the Strategic Road Network (SRN) but the wider cumulative impact within the Bradford South East area and the rest of the development aspirations within the plan could severely impact the SRN. This cumulative impact will need to be established by the Council and considered by Highways England.

Representation IDs : 3654, 15427

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
81	Low Moor and Wyke	6	6	2	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objections to content of Local Area Strategy • Support for Vision for Wyke • Highway Infrastructure	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BSE1: Bradford South East, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. General • The Local Area Strategy should be amended to reflect the fact that the area benefits from its close proximity to the transport network (M62/M606) • Reference needed to additional available employment land north of Whitehall Rd.
Support:
1. Vision for Wyke • The list of sites selected are the most suitable and the vision for the future of Wyke is supported but concern raised on the number of hot food take-aways in the local centres and comment made that there are already too many.
Comments:
1. Highway Infrastructure

Summary of Representations
• On their own, the proposals will not have a severe impact on the Strategic Road Network (SRN) but the wider cumulative impact within the Bradford South East area and the rest of the development aspirations within the plan could severely impact the SRN. This cumulative impact will need to be established by the Council and considered by Highways England. **2. Alternate Sites** • Further additional allocations should be considered with particular reference to rejected site SE/070 **3. Further consultation** • Future consultation must ensure that neighbouring communities and Kirklees Council should continue to be consulted

Representation IDs: 978, 3653, 15428, 17452, 18083, 29640

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
82	Bierley	7	7	3	2	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocations • Impact on highways • Impact on local infrastructure • Support for transport infrastructure • Highway infrastructure – impact on SRN • Direction of further consultation	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BSE1: Bradford South East, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Site Allocations • Additional sites should be allocated to the Bierley sub area to support the aims of the strategy and diversify Local housing offer – given the accessibility of the area
2. Impact on Highways • Proposals will increase pressure on local roads and create more pollution
3. Local Infrastructure • Bierley has a lack of open space and the proposals mean further losses
Support:
1. Transport Infrastructure • Support for Odsal Park and Ride and Mass Transport hub proposal

Summary of Representations
Comments:
1. Highway Infrastructure • On their own, the proposals will not have a severe impact on the Strategic Road Network (SRN) but the wider cumulative impact within the Bradford South East area and the rest of the development aspirations within the plan could severely impact the SRN. This cumulative impact will need to be established by the Council and considered by Highways England.
2. Further consultation • Future consultation must ensure that neighbouring communities and Kirklees Council should continue to be consulted and were keen to see walking and cycling routes that could facilitate existing links in Kirklees Local Plan

Representation IDs : 981, 3184 ,3652, 15429, 17122, 17128, 29642

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
83	Holmewood	1563	1536	1558	0	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impacts on Highway Infrastructure/Local Roads • Other objections, including lack of brownfield site usage • Scale of housing	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BSE1: Bradford South East, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections:

1. **Green Belt sites comments**
   - No Exceptional circumstances have been demonstrated for green belt changes in Holmewood.
   - No appreciation of the cultural and historic or recreation value of the green belt allocations
   - Sites provide access to wider countryside for walking, cycling and other leisure pursuits - its loss will impact health
   - Holmewood has diverse wildlife- no assessment of the impact on the proposals on the environment, Black Carr Woods or ecology
   - Development on the land will increase flood risk further down the valley
   - Impact on sewerage systems, schools and other local services
   - Loss of wildflower meadows
   - No information has been provided on the potential of so much growth on local roads
   - Impact on listed buildings
   - Impact on neighbouring communities through loss of "green lung"
2. **Highway Infrastructure/Local Roads**

Summary of Representations
• New road building proposals are inconsistent with the Councils declaration of a climate emergency- new roads will increase local pollution levels • Public transport is very limited on the estate
3. Other • The 2021 census should inform future housing needs. • Other undeveloped brownfield sites are available • Social deprivation will not be addressed through an urban extension • Potential impact on the registered battlefield. Text should read *"Growth at Holme Wood will be delivered in a manner which safeguards the character and setting of the Registered Battlefield at Adwalton and the other designated heritage assets in its vicinity*" • Local Strategy should be renamed as "Tong" not "Holmewood"
Comments:
1. Scale of Housing proposed • Amount of housing proposed is too low and should be increased to meet housing need • Scale of housing distribution in SE area is unfairly aimed at Holmewood • Leeds Council commented that "No safeguarded land has been allocated" and hence they would need to reserve their position until further evidence is provided
2. Highway impacts • There is limited information provided about the link road is vague • The proposals will not on their own have severe impact on the strategic road network but the wider cumulative impact on the SE area and the rest of the Local Plan aspirations could • Potential impact on adjoining Local Authority roads through increased traffic and pollution and pressure on infrastructure will need to be addressed

Representation IDs: 114, 376, 496, 663, 852, 1152, 1375, 3650, 4078, 4968, 4980, 6186, 6200, 6220, 6229, 6238, 6247, 6256, 6265, 6273, 6283, 6294, 6303, 6312, 6322, 6341, 6354, 6363, 6372, 6381, 6390, 6398, 6417, 6440, 6450, 6459, 6470, 6496, 6505, 6514, 6523, 6532, 6543, 6552, 6564, 6573, 6585, 6596, 6607, 6615, 6625, 6634, 6645, 6654, 6663, 6681, 6693, 6718, 6728, 6738, 6752, 6775, 6784, 6793, 6807, 6824, 6848, 6862, 6873, 6883, 6894, 6907, 6926, 6935, 6947, 6962, 6976, 6986, 6988, 6997, 7007, 7017, 7028, 7042, 7057, 7066,

7075, 7098, 7109, 7118, 7127, 7158, 7175, 7190, 7245, 7288, 7298, 7307, 7316, 7337, 7385, 7395, 7409, 7419, 7435, 7448, 7462, 7471,
7482, 7492, 7505, 7516, 7529, 7545, 7554, 7581, 7590, 7599, 7608, 7617, 7626, 7635, 7644, 7653, 7663, 7672, 7682, 7692, 7701, 7712,
7721, 7731, 7741, 7750, 7759, 7768, 7777, 7788, 7797, 7806, 7817, 7838, 7847, 7848, 7867, 7880, 7889, 7899, 7908, 7918, 7935, 7944,
7962, 7977, 7986, 7995, 8004, 8025, 8035, 8036, 8045, 8054, 8063, 8082, 8209, 8230, 8240, 8252, 8281, 8283, 8292, 8301, 8310, 8319,
8354, 8364, 8373, 8385, 8394, 8405, 8414, 8443, 8452, 8462, 8471, 8698, 8707, 8716, 8727, 8737, 8746, 8755, 8775, 8792, 8807, 8816,
8833, 8843, 8852, 8861, 8875, 8884, 8893, 8902, 8915, 8924, 8935, 8944, 8954, 8967, 8978, 8988, 8999, 9017, 9026, 9035, 9044, 9054,
9063, 9079, 9093, 9103, 9112, 9122, 9134, 9145, 9154, 9163, 9172, 9180, 9190, 9201, 9214, 9223, 9232, 9243, 9252, 9263, 9272, 9281,
9282, 9287, 9296, 9297, 9306, 9307, 9308, 9309, 9320, 9329, 9338, 9347, 9356, 9365, 9374, 9383, 9392, 9401, 9411, 9420, 9429, 9440,
9449, 9458, 9467, 9478, 9487, 9496, 9505, 9514, 9525, 9526, 9527, 9528, 9529, 9532, 9533, 9542, 9543, 9544, 9545, 9546, 9547, 9548,
9549, 9550, 9551, 9554, 9555, 9556, 9557, 9558, 9559, 9568, 9577, 9586, 9595, 9604, 9613, 9622, 9640, 9656, 9665, 9680, 9689, 9698,
9710, 9725, 9734, 9743, 9752, 9766, 9775, 9784, 9793, 9833, 9842, 9851, 9861, 9877, 9899, 9908, 9917, 9927, 9936, 9939, 9948, 9965,
9977, 9986, 9995, 10004, 10021, 10032, 10046, 10051, 10060, 10071, 10089, 10098, 10107, 10119, 10130, 10142, 10154, 10166, 10175,
10188, 10204, 10214, 10237, 10258, 10265, 10278, 10287, 10297, 10307, 10316, 10325, 10342, 10353, 10370, 10382, 10391, 10401, 10410,
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16456, 16465, 16474, 16486, 16495, 16504, 16538, 16554, 16566, 16576, 16587, 16597, 16635, 16644, 16653, 16662, 16671, 16680, 16704,
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18328, 18337, 18352, 18361, 18370, 18379, 18427, 18436, 18445, 18454, 18463, 18472, 18481, 18503, 18512, 18521, 18534, 18543, 18561,
18564, 18575, 18585, 18594, 18603, 18612, 18621, 18630, 18639, 18648, 18659, 18670, 18679, 18688, 18697, 18706, 18731, 18740, 18759,
18793, 18802, 18811, 18820, 18831, 18840, 18849, 18858, 18877, 18886, 18895, 18898, 18967, 18976, 18985, 18994, 19003, 19012, 19021,
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19227, 19236, 19245, 19256, 19265, 19274, 19283, 19292, 19301, 19310, 19319, 19328, 19337, 19346, 19355, 19364, 19373, 19382, 19407,
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19603, 19641, 19650, 19659, 19669, 19679, 19689, 19700, 19710, 19719, 19743, 19752, 19771, 19785, 19794, 19853, 19863, 19953, 19962,
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20659, 20668, 20677, 20686, 20695, 20709, 20718, 20727, 20736, 20745, 20778, 20787, 20796, 20805, 20814, 20823, 20833, 20842, 20851,
20860, 20869, 20878, 20887, 20896, 20905, 20914, 20923, 20932, 20941, 20950, 20959, 20968, 20977, 20986, 20995, 21010, 21031, 21040,
21055, 21083, 21095, 21113, 21126, 21146, 21155, 21170, 21193, 21212, 21221, 21230, 21242, 21252, 21268, 21277, 21294, 21303, 21312,
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26664, 26673, 26744, 26791, 27103, 27491, 27500, 27515, 27524, 27539, 27593, 27604, 27613, 27622, 27631, 27640, 27659, 27669, 27678, 27757, 27775, 27855, 27872, 27881, 27946, 27955, 27976, 27997, 28006, 28016, 28026, 28035, 28046, 28056, 28067, 28077, 28094, 28104, 28114, 28123, 28149, 28160, 28164, 28223, 28233, 28312, 28329, 28338, 28347, 28356, 28419, 28428, 28447, 28456, 28465, 28478, 28512, 28542, 28551, 29098, 29344, 29353, 29362, 29371, 29380, 29461, 29470, 29479, 29488, 29643, 29668, 29757, 29766, 29897, 29972, 29981

Sites

As highlighted above, 48 sites and were put forward in the Preferred Options document to meet the proposed development requirements for Bradford South East (35 for residential and 13 for employment). Under Q84 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **12,291** representations were received in relation to policies SE1/H to SE48/H from **12,153** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents, landowners, organisations and local Ward Councillors. **Table 2.72.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in

Table 2.72.4.

Table 2.72.3: Bradford South East Proposed Sites (SE1/H to SE48/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE1/H: Highbridge Terrace, West Bowling	1	1	0	0	1
SE2/H: Copgrove Road, Holme Wood	3	3	1	1	1
SE3/H: Cleckheaton Road	3	3	1	1	1
SE4/H: Spen View Lane / Shetcliffe Lane, Bierley	6	5	4	1	1
SE5/H: Upper Castle Street, West Bowling	1	1	0	0	1
SE6/H: Rooley Lane	1	1	0	0	1
SE7/H: Landscove Avenue, Holme Wood	1	1	0	0	1
SE8/H: Grayswood Drive, Holme Wood	2	2	0	1	1
SE9/H: Stoneyhurst Square, Holme Wood	1	1	0	0	1
SE10/H: Land at Muirhead Fold, Holme Wood	1	1	0	0	1
SE11/H: Bolling Hall Laundry - off Rooley Lane	1	1	0	0	1
SE12/H: Cordingley Street, Holme Wood	3	3	0	2	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE13/H: Ned Lane, Holme Wood (1)	1519	1501	1515	0	4
SE14/H: Albert Terrace, Oakenshaw	3	3	1	1	1
SE15/H: Proctor Street Playing Fields, Off Tong Street, Holme Wood	3	3	2	0	1
SE16/H: Holme Lane, Holme Wood	2	2	1	0	1
SE17/H: Kesteven Road / Heysham Drive, Holme Wood	2	2	0	1	1
SE18/H: Ned Lane, Holme Wood (2)	1512	1496	1510	0	2
SE19/H: Westgate Hill Street, Tong	5	5	2	1	2
SE20/H: Dean Beck Avenue	48	46	45	1	3
SE21/H: New Lane, Laisterdyke	1	1	0	0	1
SE22/H: Furnace Road, Oakenshaw	3	3	1	1	1
SE23/H: Tennis Avenue	2	2	0	1	1
SE24/HC: Upper Castle Street	2	2	1	0	1
SE25/H: Grayswood Drive, Holme Wood	1	1	0	0	1
SE26/HC: Shetcliffe Lane	1	1	0	0	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE27/H: Mead View, Holme Wood	2	2	0	1	1
SE28/H: Somerton Drive, Holme Wood	1	1	0	0	1
SE29/H: Kaycell Street, Bierley	2	2	0	1	1
SE30/H: Bierley Lane, Bierley	4	4	2	1	1
SE31/H: Land West of Ned Lane, Holme Wood	1516	1500	1513	0	3
SE32/E: Euroway Trading Estate, Commondale Way	5	5	1	3	1
SE33/E: Land East of Laisterdyke and South Leeds Road	3	3	1	1	1
SE34/E: Land East of Sticker Lane	2	2	1	0	1
SE35/E: Lower Lane, Parry Lane and Sticker Lane	2	2	0	1	1
SE36/E: Parry Lane	4	4	0	2	2
SE37/E: North of Westgate Hill/ West of Tong Lane	1522	1503	1517	1	4
SE38/E: Nufarm, Wyke Lane	4	4	1	2	1
SE39/E: Neville Road / Lower Lane	1	1	0	0	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE40/E: Staithgate Lane North	6	6	2	2	2
SE41/E: Westgate Hill Street	3	3	1	1	1
SE42/E: Staithgate Lane South	4	4	2	1	1
SE43/E: Dick Lane	2	2	0	1	1
SE44/E: Shetcliffe Lane	2	2	0	1	1
SE45/H: Holme Lane/Raikes Lane	1516	1500	1513	0	3
SE46/H: Land West of Tong Lane and east of Holme Wood	1523	1507	1519	1	3
SE47/H: Westgate Hill Street, Holme Wood	1522	1505	1517	1	4
SE48/H: Westgate Hill Street, Tong	1517	1500	1513	1	3
Totals	**12291**	**12153**	**12187**	**34**	**71**

Table 2.72.4: Bradford South East Proposed Sites (SE1/H to SE48/H) - Summary of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE1/H: Highbridge Terrace, West Bowling	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – Zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H975 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Comments:
1. Flood Risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 28951

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE2/H: Copgrove Road, Holme Wood	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on heritage • Flood risk – Zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H986) is not carried forward as a preferred option and rejected. • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

1. **Green Belt**
   - Green Belt should stop urban expansion and to stop Bradford becoming part of Leeds. It is undemocratic to propose development of Green Belt in Tong.
2. **Heritage**
   - The new road and housing proposals directly effect a Grade II house and land.

Support:

1. **Housing Allocation**
   - This is a poor quality site. Agree with assessments to develop for housing.

Comments:

1. **Flood risk**

- Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 3658, 4991, 28952

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE3/H: Cleckheaton Road	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site access issues • Location adjoining railway line • Impact on environment • Support for the allocation • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H994 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Access**
   - Objection relating to access and visibility.
2. **Location**
   - The site adjoins a high speed rail line, development would be subjected to noise and vibration.
3. **Environment**
   - A range of environmental impacts including increased traffic, impacts on woodland and wildlife habitats, light pollution to the nearby LNR and impacts on the cycleway.

Support:

1. **Housing Allocation**
   - Ward Councillors fully support this site.

Comments:

1. **Flood risk**

- Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 985, 5817, 28953

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE4/H: Spen View Lane / Shetcliffe Lane, Bierley	6	5	4	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impacts on heritage • Flood risk – Zone 1 • Development constraints • Use of greenfield land • Lack of infrastructure • Reconsideration of site • Support for allocation	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H879 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. Heritage

- Further analysis required on heritage impact relating to listed buildings within the site and on the western edge.
- Assess the impact of loss of this undeveloped site and its subsequent development might have upon the significance of listed buildings.
- If development would harm the elements which contribute to the significance of Listed buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan. If it is concluded that the development would still be likely to harm elements which contribute to the significance of the Listed Building, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as required by NPPF).

2. Flood risk

- The site has some drainage issues in part and evidence of potential surface water flooding along eastern edge.

3. Development Constraint

- Small area within the northwest of the site within high risk former mining activities area with further investigation required.

4. Greenfield Site

- The site is greenfield and should not be allocated before brownfield and infill sites which are more sustainable.
- There has not been sufficient examination of brownfield sites in the area to justify including this greenfield site in the plan.

5. Infrastructure

- Site has poor road and public transport links.
- The Plan does not address how the infrastructure in the area would cope with additional houses.

6. Site Omission

- SE/008 to be reconsidered, it is poor quality green land that attracts unsocial behaviour and fly tipping whilst proving limited community benefit. Including sites like this would reduce demands on greenbelt allocations in Holmewood.

Support:

1. Site Allocation

- The Site would constitute a logical continuation of the existing policy position for the site as safeguarded land in the RUDP.
- it is considered that the housing needs within the District have increased since the adoption of the RUDP in 2005 and justifies the need to allocate the Site rather than retain it as safeguarded land.
- The Site is ideally suited for housing, it is located adjacent existing built development with good access to public transport, schools, employment, cultural/amenity spaces, and health facilities.
- There would be no significant adverse effects of the Site being developed. Issues raised in the site assessment can be overcome through good design and layout that the provision of appropriate mitigation measures.

Comment:

1. Flood risk

- Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs:4737, 4950 4989, 17124, 28954, 29177

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE5/H: Upper Castle Street, West Bowling	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – Zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1001 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Comment:

1. **Flood risk**

- Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs:28955

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE6/H: Rooley Lane	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1002) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs:28956

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE7/H: Landscove Avenue, Holme Wood	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1003 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Comment:

1. **Flood risk**

- Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs:28957

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE8/H: Grayswood Drive, Holme Wood	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for allocation • Flood risk – Zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1004 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Support:

1. **Housing Allocation**
   - Support for this poor quality green space / brownfield site which has close links to public transport and local retail.

Comment:

1. **Flood risk**
   - Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs:4988, 28958

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE9/H: Stoneyhurst Square, Holme Wood	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1005 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No objections
Support:
No representations in support
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs:28959

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE10/H: Land at Muirhead Fold, Holme Wood	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H976 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No objections
Support:
No representations in support
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs:28960

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE11/H: Bolling Hall Laundry - off Rooley Lane	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H977) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:
No objections
Support:
No representations in support
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs:28961

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE12/H: Cordingley Street, Holme Wood	3	3	0	2	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for allocation • Potential heritage constraints • Flood risk – Zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H978) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:
No objections
Support:
1. Site Allocation • Support this proposal as its location is close to public transport and retail environment and the site is currently underutilised.
2. Heritage • The character of Prospect Mill is currently compromised by, amongst other things, the use of security shutters over ground floor doors and windows and the poor state of the yard area. • Consideration should also be given as to whether any of the buildings or structures should be classified as non-designated heritage assets.

- The sensitive conversion of these buildings as part of a residential led mixed use scheme as proposed provides an opportunity to enhance the significance of these characterful and distinctive buildings.

Comment:

1. **Flood risk**
   - Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs:4985, 28962, 29179

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE13/H: Ned Lane, Holme Wood (1)	1519	1501	1515	0	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Loss of open space • Impact on road infrastructure • Flood risk • Impact on house prices • Impact on environment • Alternative sites • Crime and anti-social behaviour • Development on Green Belt • Development constraints • Choice of data used • Support for development	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H979 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Open Space**
   - Loss of an area which provides access to valuable green space for walking, running, cycling and horse-riding etc.
   - This proposed development will impact on health/wellbeing of the population.
   - Loss of open space creating buffer between Leeds and Bradford – keeping the areas separate.
   - Loss of the area would have a detrimental effect on teaching children about nature and scouting
2. **Road Infrastructure**
   - Lack of information provided on road impact.

- New road building is inconsistent with the Council's declaration of a climate emergency in 2019.
- Concern that road will release further development sites, increase air pollution.
- Object to the increase in traffic this development will bring.
- The area has no alternative greener transport infrastructure- car only/limited buses
- Highway improvements to Ned Lane need to include a safe pavement or preferably a field side path along this presently narrow lane between its intersection with definitive public paths Tong 8 And Tong 7.

3. Impact on Infrastructure

- The towns are already overpopulated - This will add to the fact not enough schools dentists doctors places available.

4. Flood Risk

- Development will lead to flooding further down the valley. Flood risk assessment is vital.

5. Impact on House Prices

- Developing this area would destroy our house prices

6. Environment

- Loss of area which is biodiverse and home to hundreds of threatened species.
- No assessment of the impact of development on the environment, especially on ancient woodland at Black Carr and Kit Woods.
- Building in it would be an ecological disaster.
- Loss of this natural asset for future generations.
- The Plan has no consideration of greener transport links

7. Alternative Sites

- Other brownfield sites and unsightly areas could be used for housing developments
- No sufficient justification for the use of green belt when there are brownfield sites and buildings in Bradford which have not been developed – at odds with national planning guidance which prioritise brownfield first

8. Social Behaviour

- Highlighted the problems of crime and anti-social behaviour despite many initiatives and interventions undertaken by the Council over the years encountered with having such a large area of housing in one place.
- Increasing the volume of housing so close to Holme Wood estate will only increase anti-social behaviour problems.

9. Green Belt

- Exceptional circumstances have not been demonstrated, no appreciation of cultural, historical, recreational or environmental aspects.
- Reduction of protected open green belt land separating Bradford urban area from Leeds urban areas.

10. Development Constraints

- Numerous old coal mines in this area.

11. Change of Circumstance

- No consideration of the effects of the pandemic and Brexit.
- The 2021 census should inform future planning policy.
- Based on out of date housing need/numbers.

Support:

No representations in support

Comment:

1. **Development Support**

- welcomed the allocation but were disappointed that the full Holme Wood extension had not been allocated

Representation IDs: 1305, 3659, 4983, 6176, 6190, 6212, 6221, 6230, 6239, 6248, 6257, 6266, 6275, 6286, 6295, 6304, 6313, 6333, 6342, 6355, 6364, 6373, 6382, 6391, 6406, 6432, 6442, 6451, 6460, 6488, 6497, 6506, 6515, 6524, 6535, 6544, 6556, 6565, 6577, 6588, 6599, 6608, 6617, 6626, 6636, 6646, 6656, 6673, 6682, 6709, 6720, 6730, 6742, 6767, 6776, 6785, 6799, 6812, 6839, 6850, 6864, 6875, 6886, 6899, 6911, 6927, 6939, 6951, 6963, 6968, 6978, 6989, 6999, 7008, 7018, 7031, 7045, 7058, 7067, 7089, 7100, 7110, 7119, 7145, 7162, 7176, 7234, 7255, 7264, 7277, 7290, 7299, 7309, 7324, 7329, 7341, 7350, 7360, 7372, 7377, 7387, 7401, 7411, 7427, 7440, 7454, 7463, 7474, 7484, 7497, 7507, 7521, 7537, 7546, 7560, 7568, 7573, 7585, 7591, 7600, 7609, 7618, 7627, 7636, 7645, 7655, 7664, 7674, 7684, 7693, 7703, 7713, 7723, 7733, 7742, 7751, 7760, 7769, 7780, 7789, 7798, 7809, 7830, 7839, 7859, 7872, 7881, 7891, 7900, 7910, 7927, 7936, 7954, 7969, 7978, 7987, 7996, 8017, 8027, 8037, 8046, 8055, 8074, 8177, 8201, 8213, 8221, 8229, 8232, 8245, 8264, 8269, 8275, 8287, 8293, 8302, 8311, 8325, 8341, 8349, 8356, 8365, 8377, 8386, 8398, 8406, 8435, 8444, 8454, 8463, 8475, 8483, 8494, 8502, 8510, 8518, 8526, 8534, 8542, 8550, 8559, 8569, 8582, 8593, 8602, 8610, 8618, 8627, 8641, 8651, 8663, 8675, 8683, 8693, 8702, 8711, 8722, 8729, 8738, 8747, 8767, 8784, 8799, 8808, 8825, 8835, 8844, 8853, 8867, 8876, 8885, 8894, 8907, 8916, 8927, 8936, 8946, 8959, 8970, 8980, 8991, 9009, 9018, 9027, 9036, 9046, 9055, 9071, 9085, 9094, 9095, 9113, 9114, 9126, 9137, 9146, 9155, 9164, 9173, 9182, 9193, 9206, 9215, 9224, 9235, 9244, 9255, 9264, 9273, 9288, 9298, 9312, 9321, 9330, 9339, 9348, 9357, 9366, 9375, 9384, 9393, 9403, 9412, 9421, 9432, 9441, 9450, 9459, 9470, 9479, 9488, 9497, 9506, 9534, 9560, 9569, 9578, 9587, 9596, 9605, 9614, 9632, 9648, 9657, 9672, 9681, 9690, 9702, 9717, 9726, 9735, 9744, 9758, 9767, 9776, 9785, 9825, 9834, 9843, 9853, 9869, 9891, 9900, 9909, 9919, 9928, 9940, 9957, 9969, 9978, 9987, 9996, 10013, 10024, 10040, 10052, 10081, 10090, 10099, 10111, 10122, 10134, 10146, 10158, 10167, 10180, 10197, 10206, 10229, 10248, 10250, 10268, 10270, 10279, 10299, 10308, 10317, 10334, 10345, 10362, 10374, 10383, 10393, 10402, 10411, 10437, 10439, 10448, 10462, 10477, 10492, 10508, 10522, 10533, 10548, 10557, 10570, 10579, 10588, 10597, 10606, 10617, 10631, 10640,

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Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE14/H: Albert Terrace, Oakenshaw	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on setting of heritage asset • Support for site allocation • Flood risk – flood zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H980) is not carried forward as a preferred option and rejected. • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

1. Heritage

- The site is located opposite a Grade II listed former goods station and warehouse, the Plan should make it clear that development proposals for this area would need to ensure that those elements which contribute to the significance of this building are not harmed.
- Add "Development should conserve and, where possible, enhance those elements which contribute to the significance of the Grade II Listed former goods station."

Support:

1. Site Allocation

- Ward Councillors fully support this site allocation.

Comment:

1. Flood risk

- Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 986, 28964, 29186

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE15/H: Proctor Street Playing Fields, Off Tong Street, Holme Wood	3	3	2	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Loss of open space • Site omission – land to east to be included • Flood risk – flood zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H981) is not carried forward as a preferred option and rejected. • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:
1. Land Use • Loss of Open Space
2. Site Omission • The outline of SE15/H should include the land to the east to create a larger site of housing on low quality green space which would reduce demand on greenbelt sites at Holmewood North and South
Support:
No Representations in Support
Comment:
1. Flood risk

- Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation ID: 4715, 4981, 28965

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE16/H: Holme Lane, Holme Wood	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objection to greenbelt release • Impact on road network • Flood risk – flood zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H888) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:
1. Green Belt • Loss of Green Belt open space and farmland.
2. Roads • Impact on local roads - widening will exacerbate the problem.
Support:
No representations in Support
Comment:
1. Flood risk

- Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 1199, 28966

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE17/HC: Kesteven Road / Heysham Drive, Holme Wood	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for brownfield redevelopment • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H983 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No objections
Support:
1. Housing Allocation • Brownfield site needing redevelopment.
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 4973, 28967

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE18/H: Ned Lane, Holme Wood (2)	1512	1496	1510	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Change of global/national circumstances • Loss of open space • Impact on road infrastructure • Impact on environment • Flood risk – Zone 1 • Impact on house prices • Development on Green Belt • Impacts on heritage • Lack of/demand on infrastructure • Alternative sites • Crime and anti-social behaviour	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified, along with site SE31/H as H1564 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Change of Circumstance**
   - No consideration of the effects of the pandemic and Brexit. The 2021 census should inform future planning policy.
2. **Open Space**
   - Loss of an area which provides access to green space for walking, running, cycling and horse-riding etc.
   - Development would reduce of green infrastructure and "green Lung" between Bradford and Leeds.
   - This proposed development will impact on health/wellbeing of the population.
   - Loss of greenspace would be detrimental to the appeal of Pudsey
3. **Road Infrastructure**

- Lack of information provided on road impact.
- New road building is inconsistent with the Council's declaration of a climate emergency in 2019.
- Concern that road will release further development sites, increase air pollution on Tong Street and clean air zone.
- Object to the increase in traffic this development will bring.
- No consideration of greener transport links. The area has no alternative greener transport infrastructure- car only/limited buses

4. Environment

- Loss of area which is biodiverse and home to hundreds of threatened species.
- No assessment of the impact of development on the environment, especially on ancient woodland at Black Carr and Kit Woods.
- Building in it would be an ecological disaster. Detrimental loss to local fauna/flora and trees- threatened species – the area should be re wilded.
- Loss of the area would have a detrimental affect on teaching children about nature
- Wasteful loss of countryside which acts as carbon sink and absorbs moisture

5. Flood Risk

- Development will lead to flooding further down the valley. Flood risk assessment is vital.

6. Impact on House Prices

- Developing this area would destroy our house prices

7. Green Belt

- Exceptional circumstances have not been demonstrated, no appreciation of cultural, historical, recreational or environmental aspects.

8. Heritage

- Impact of new roads on listed buildings and the conservation area at Fulneck

9. Infrastructure

- Demand on schools and other local services/insufficient capacity.

10. Alternative Sites

- Other brownfield sites and unsightly areas could be used for housing developments

11. **Social Behaviour**

- Highlighted the problems of crime and anti-social behaviour despite many initiatives and interventions undertaken by the Council over the years encountered with having such a large area of housing in one place.
- Increasing the volume of housing so close to Holme Wood estate will only increase these problems.

Support:

No representations in support
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 3660, 6180, 6191, 6213, 6222, 6231, 6240, 6249, 6258, 6267, 6276, 6287, 6296, 6305, 6314, 6334, 6343, 6356, 6365, 6374, 6383, 6392, 6407, 6433, 6443, 6452, 6461, 6489, 6498, 6507, 6516, 6525, 6536, 6545, 6557, 6566, 6578, 6589, 6600, 6609, 6618, 6627, 6637, 6647, 6657, 6674, 6684, 6710, 6721, 6731, 6743, 6768, 6777, 6786, 6800, 6813, 6840, 6852, 6866, 6876, 6887, 6900, 6912, 6928, 6940, 6952, 6961, 6969, 6979, 6990, 7000, 7009, 7019, 7032, 7046, 7059, 7068, 7090, 7102, 7111, 7120, 7147, 7165, 7177, 7233, 7254, 7263, 7278, 7291, 7300, 7310, 7323, 7330, 7340, 7349, 7359, 7371, 7378, 7388, 7402, 7412, 7428, 7441, 7455, 7464, 7475, 7485, 7498, 7508, 7522, 7538, 7547, 7559, 7567, 7574, 7584, 7592, 7601, 7610, 7619, 7628, 7637, 7646, 7656, 7665, 7675, 7685, 7694, 7704, 7714, 7724, 7734, 7743, 7752, 7761, 7770, 7781, 7790, 7799, 7810, 7831, 7840, 7860, 7873, 7882, 7892, 7901, 7911, 7928, 7937, 7955, 7970, 7979, 7988, 7997, 8018, 8028, 8038, 8047, 8056, 8075, 8176, 8202, 8212, 8220, 8228, 8233, 8244, 8263, 8274, 8286, 8294, 8303, 8312, 8324, 8340, 8348, 8357, 8366, 8378, 8387, 8397, 8407, 8436, 8445, 8455, 8464, 8474, 8482, 8493, 8501, 8509, 8517, 8525, 8533, 8541, 8549, 8558, 8568, 8581, 8592, 8601, 8609, 8617, 8626, 8640, 8650, 8662, 8674, 8682, 8692, 8701, 8710, 8721, 8730, 8739, 8748, 8768, 8785, 8800, 8809, 8826, 8836, 8845, 8854, 8868, 8877, 8886, 8895, 8908, 8917, 8928, 8937, 8947, 8960, 8971, 8981, 8992, 9010, 9019, 9028, 9037, 9047, 9056, 9072, 9086, 9096, 9105, 9115, 9127, 9138, 9147, 9156, 9165, 9174, 9183, 9194, 9207, 9216, 9225, 9236, 9245, 9256, 9265, 9274, 9289, 9299, 9313, 9322, 9331, 9340, 9349, 9358, 9367, 9376, 9385, 9394, 9404, 9413, 9422, 9433, 9442, 9451, 9460, 9471, 9480, 9489, 9498, 9507, 9535, 9561, 9570, 9579, 9588, 9597, 9606, 9615, 9633, 9649, 9658, 9673, 9682, 9691, 9703, 9718, 9727, 9736, 9745, 9759, 9768, 9777, 9786, 9826, 9835, 9844, 9854, 9870, 9892, 9901, 9910, 9920, 9929, 9941, 9958, 9970, 9979, 9988, 9997, 10014, 10025, 10041, 10053, 10082, 10091, 10100, 10112, 10123, 10135, 10147, 10159, 10168, 10181, 10198, 10207, 10230, 10249, 10251, 10269, 10271, 10280, 10300, 10309, 10318, 10335, 10346, 10363, 10375, 10384, 10394, 10403, 10412, 10434, 10440, 10449, 10463, 10478, 10493, 10509, 10523, 10534, 10549, 10558, 10571, 10580, 10589, 10598, 10607, 10618, 10632, 10641, 10655, 10666, 10681, 10692, 10705, 10715, 10725, 10737, 10746, 10770, 10780, 10790, 10797, 10806, 10816, 10830, 10841, 10851, 10863, 10874, 10883, 10896, 10905, 10918, 10986, 11005, 11018, 11037, 11045, 11076, 11089, 11098, 11108, 11118, 11121, 11130, 11139, 11148, 11157, 11166, 11175, 11184, 11193, 11202, 11220, 11229, 11238, 11269, 11287, 11299, 11311, 11321, 11331, 11340, 11353, 11423, 11435, 11440, 11453, 11471, 11484, 11511, 11522, 11531, 11559, 11579, 11597, 11611, 11630, 11641, 11657, 11668, 11679, 11694, 11707, 11716, 11734, 11755, 11764, 11778, 11786, 11814, 11829, 11848, 11858, 11867, 11878, 11897, 11910, 11923, 11939,

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Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE19/H: Westgate Hill Street, Tong	5	5	2	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt • Heritage impacts • Change in circumstances • Impact of new road • Loss of green space • Environmental concerns • Flood risk – Zone 1 • Support for allocation and road proposal • Impact on infrastructure	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified, alongside SE46/H, SE47/H & SE48/H, as part of H911, in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Green Belt**
   - Green Belt should stop urban expansion and to stop Bradford becoming part of Leeds. It is undemocratic to propose development of Green Belt in Tong.
   - Green Belt exceptional circumstances have not been demonstrated, no appreciation of cultural, historical, recreational or environmental aspects.
2. **Heritage**
   - The new road and housing proposals directly effect a Grade II house and land.

3. Consideration of Allocation

- No consideration of the effects of the pandemic and Brexit.
- The 2021 census should inform future planning policy.

4. Road Proposal

- No information provided on road impact.
- New road building is inconsistent with the Council's declaration of a climate emergency in 2019.
- Concern that road will release further development sites, increase air pollution and traffic.

5. Green Space

- Area provides access to green space for walking, running, cycling and horse-riding etc. Its development will impact health.

6. Environmental Concerns

- Area is biodiverse and home to hundreds of threatened species.
- No assessment of the impact of development on the environment, especially on ancient woodland at Black Carr and Kit Woods.
- Building in it would be an ecological disaster.

7. Flood Risk

- Development will lead to flooding further down the valley.
- Flood risk assessment is vital.

Support:

1. Housing Allocation

- The sites (SE19/H, SE46/H, SE47/H, SE48/H and SE37/E) are deliverable, with a willing land promoter on board to ensure collectively the sites come forward as a comprehensive development**.**
- A Masterplan and Transport and Access Appraisal have been prepared and illustrate the sites can deliver a well-designed urban extension.

2. Road Proposal

- Whilst the Holme Wood South Urban Extension is not reliant on the delivery of the South East Bradford Access Road, the Urban Extension will contribute to the facilitation of the potential new strategic highway as a long-term aspiration.

Comment:

1. **Flood risk**
   - Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

2. **Green Belt**
   - The proposed allocations encroach into the green belt and reduction of the strategic green belt gap between Leeds and Bradford
   - In setting exceptional circumstances for the release of 5 proposed housing sites - justification should be demonstrated that all other options have been exhausted for housing in other locations within the settlement hierarchy.

3. **Impact on Infrastructure**
   - The overall impact of these sites and significant housing numbers on infrastructure provision in Leeds.
   - Further evidence / information is requested to support highway improvements as shown on the interactive map for Wakefield and Tong Road are sufficient to support the number of houses proposed.

Representation IDs: 3661, 8260, 28140, 28969, 29665

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE20/H: Dean Beck Avenue	48	46	45	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Loss of green/open space • Multiple development issues • Flood risk – Zone 1 • Impact on Infrastructure • Location • Environmental impact • Development on Green Belt land • History of planning refusals • Impact on existing community • Support for site and location • Sustainability appraisal	• This site is under construction and is identified as H898 in the Regulation 19 Local Plan.

Objections:

1. Loss of Green Space/Corridor/Open Space

- Do not take away our only Green area.
- Important part of green corridor for SE Bradford.
- There is a lack of green space in this area and development will take away one of the few green lungs in South Bradford.
- There is a lack of open play spaces for children – additional houses will add to this problem.
- This area is seeing a disproportionate amount of allocation of green spaces for housing developments.

2. Development Site Issues

- Development would put children at risk through increased pollution and serious injury from more and more cars on our small streets.
- Clean air targets missed.
- Not enough tests done on the earth to be dug up - Concerns digging this land up and how this could impact on residents' health.
- Site access is poor.
- Caddick have no respect for the local residents/community and have shown this by not maintaining the property within the site which they propose to demolish.
- Former iron and coal pit landfill.
- Evidence of the contamination from the tip is needed
- Mine shafts and tunnels are located below this land.
- Site should not be developed for housing until Park and Ride is finalised.
- Concerns about level of affordable housing on site being reduced.
- Development will affect the overall economy of the city.
- The proposals fail to meet the aspiration of the plan to build less car dependent communities.
- Bradford residents need social housing not private developers

3. Flood Risk

- Potential flooding, run off from houses not to soakaway, pollution hazard.

4. Impact on Infrastructure

- Traffic problems on narrow local roads. Traffic congestion is bad now and will increase once new residents move in.
- Poor & distant public transport – 800 metres to nearest bus stop and has infrequent buses.
- Shops, health centres & primary schools distant or full – nearest supermarket 1.5km.
- The local schools/GP surgeries don't have space for more people.
- Local school has no capacity for extra children.
- Highway and pedestrian safety concerns with issues from increased traffic flows especially on Rooley Crescent and Dean Beck Avenue.
- Routes to schools for primary children are not safe due to crossing points on busy roads.
- Impact from high numbers of vehicles using Rooley Lane.
- Shetcliffe Lane is dangerous due to increased traffic on an already unsafe road for pedestrians, and disabled people using mobility aids.
- Dean Beck Avenue is used as a cut through to avoid Staithgate roundabout.

5. Location

- Site location in relation to proximity of the tip creates risks
- Site location in relation to proximity of the park and ride scheme could create risks
- Site adjoins a very dangerous methane omitting tip and it would be criminal for this to be earmarked for housing.
- The close proximity to gateway M606 and a prime industrial area loses a quality gateway site.
- Other areas are also available for development and that would better help Bradford through regeneration of its inner city helping Bradfords local communities.
- Site next to motorway M606.
- Inadequate attention paid to the presence of several major hazard sites - no mention is made of the 2 Solensis sites at the former BASF facility in Low Moor.

6. Impact on the Environment

- Development will add to pollution and noise.
- Failure to implement Bradford Council policy which states all new developments will need to ensure that legal limits for NO2 are not exceeded. Air quality control a concern.
- Site traffic will impose dangerous conditions for residents during construction and the nuisance of mud and dust.
- Chemicals factories, potential hazard, wind direction.
- Wildlife will be negatively affected, with habitats shrinking year on year.
- Infestation of vermin.
- Impact on Odsal Wood / ancient woodland.
- The Woodland Trust objects to the inclusion of the site allocation because development is likely to cause damage and/or loss to areas of ancient woodland within or adjacent to their boundaries.

7. Green Belt

- There is documentary evidence that Bradford council should have made this site into Green Belt back in 1959 as per the advice of the Minister at the time.
- This land should be Green belt.
- The land has been used for years for grazing cattle and horses and should be the same under the envelope of green belt.

8. Planning Refusal

- Planning applications refused three times.

- Planning has already been refused by an inspector back in 1972. There is currently an open case with the planning inspector which has not been decided.
- The attached document from LRJ planning which objected against the original appeal applies to this application and should be taken into account in its entirety.

9. Impact on Existing Area/Community

- Concern about impact on house prices.
- The whole Rooley Croft situation in which houses where left valueless due to land being contaminated and underhand tactics used by developers.
- The Health, safety and mental well-being of current residents is a major concern.
- Bradford South is already densely over developed both by industry and residential.

Support:

1. Site Development Status

- The site is available (in the control of a developer) and suitable for development; there are no constraints that cannot be addressed or mitigated for.

2. Location

- The edge-of-settlement location is considered to be a highly sustainable, adjoining existing residential development along the northern boundary. The site's accessibility and sustainability credentials are also set to improve following the delivery of the adjacent Park and Ride scheme.

Comment:

1. Sustainability Appraisal

- In order to inform the sustainability appraisal and ensure an accurate assessment of the impact of the plan on soil resources we recommend that allocations over 5ha, or at least those over 20ha, have ALC surveys undertaken in order to determine the ALC grade and help inform master planning and soil handling going forward.

2. Environment

- NPPF para 175 sets out a strong presumption against development resulting in the loss or deterioration of irreplaceable habitats

3. Flood risk

- Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 2295, 2459, 2549, 2580, 2586, 2587 ,2589, 2590, 2717, 3017, 3018, 3026, 3030, 3066, 3073, 3106, 3120, 3129, 3136 ,3150, 3160, 3201, 3241, 3307, 3396, 3409, 3451, 3570, 3572, 3607, 3735, 3737, 3973, 4100, 4360 4387, 4692, 4717, 4817, 5057 ,5211 ,5268, 5417, 5418, 12316, 13459, 19247, 19904, 28970

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE21/H: New Lane, Laisterdyke	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H987 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No objections
Support:
No representations in support
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 28971

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE22/H: Furnace Road, Oakenshaw	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on heritage asset • Support for site allocation • Flood risk – flood zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H988) is not carried forward as a preferred option and rejected. • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

1. **Heritage**
   - Development should conserve and, where possible, enhance those elements which contribute to the significance of the Grade II Listed former goods station.

Support:

1. **Development**
   - Ward Councillors fully support this site

Comment:

1. **Flood risk**
   - Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 987, 28972, 29190

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE23/H: Tennis Avenue	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for development • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H989 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No objections
Support:
1. Development • Support more houses are needed as long as there is a suitable access
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 4864, 28973

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE24/HC: Upper Castle Street	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on infrastructure • Flood risk – Zone 1	• This site is under construction and is identified as H908 in the Regulation 19 Local Plan.

Objections:
1. Impact on Infrastructure • Not enough facilities for schools, health centres. • Road network too busy around this area.
Support:
No Representations in Support
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 4870, 28974

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE25/H: Grayswood Drive, Holme Wood	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – Zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H990 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No objections
Support:
No representations in support
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 28975

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE26/HC: Shetcliffe Lane	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• This site is under construction and is identified as H915 in the Regulation 19 Local Plan.

Objections:
No objections
Support:
No representations in support
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 28976

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE27/H: Mead View, Holme Wood	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for site allocation • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H991 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No objections
Support:
1. Development • Wholeheartedly support the inclusion of this site.
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 5001, 28977

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE28/H: Somerton Drive, Holme Wood	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood Risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H992 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No objections
Support:
No representations in support
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 28979

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE29/H: Kaycell Street, Bierley	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for site allocation • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H993 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No objections

Support:

1. **Support Sustainable Site Development**
   - The site is in a sustainable location within the urban area and is not subject to any ecological, landscape or heritage interests. There are no trees of note on site, and it sits with Flood Zone 1. The site can be accessed and is accessible to local services as well as frequent bus services along Rooley Avenue. Shape and topography of the site ensures a suitable layout can be achieved to deliver housing that sit comfortably with their surrounds including space for any screening to adjacent employment uses. This is a deliverable site, and its proposed allocation is supported.

Comment:

1. **Flood risk**
   - Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 2179, 28980

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE30/H: Bierley Lane, Bierley	4	4	2	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Object to loss of public open space • Brownfield sites first • Impact on the environment • Site condition – mining constraints on site • Support for the allocation • Flood risk – flood zone 1	• This site is under construction and is identified as H995 in the Regulation 19 Local Plan.

Objections:
1. Public Open Space • The POS should not be used
2. Alternative Sites • Other brownfield sites are available under sequential policy tests.
3. Impact on the Environment • This is a large Greenfield site impacting on the Bierley Wood and will require a major buffer to protect the woodland from light pollution and other urban impacts. • A S106 should be used to create and enhance the woodland buffer to minimise any effect • The site should have regard to any public footpaths leading to the woodland which should be preserved. • This is a major application that would require an environmental impact assessment.
4. Site Condition

• There are reported mining risks on site.
Support:
1. Support Development • The Site is ideally suited for housing as it is located adjacent existing built-up area with good access to public transport, schools, employment, cultural/amenity spaces, and health facilities. Providing housing on the Site would therefore contribute to the District's acute housing need as identified within the Plan and supporting evidence base.
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 4734 ,4735, 17123, 28981

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE31/H: Land West of Ned Lane, Holme Wood	1516	1500	1513	0	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Change of circumstances • Road infrastructure • Loss of open space • Environmental impacts • Alternative sites • Crime and anti-social behaviour • Flood risk • Impact on infrastructure • Impact on heritage • Other objections	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified, along with site SE18/H as H1564 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Green Belt • Exceptional circumstances have not been demonstrated
2. Change of Circumstance • No consideration of the effects of the pandemic and Brexit. • The 2021 census should inform future planning policy.
3. Road Infrastructure • Lack of information provided on road impact.

- New road building is inconsistent with the Council's declaration of a climate emergency in 2019.
- Concern that road will release further development sites, increase air pollution on Tong Street and clean air zone.
- Object to the increase in traffic this development will bring.
- No consideration of greener transport links. The area has no alternative greener transport infrastructure- car only/limited buses

4. Open Space

- Loss of an area which provides access to green space for walking, running, cycling and horse-riding etc.
- Development would reduce of green infrastructure and "green Lung" between Bradford and Leeds.
- This proposed development will impact on health/wellbeing of the population.
- Loss of greenspace would be detrimental to the appeal of Pudsey
- Impact on Tong and Fulneck valley
- Loss of agricultural land

5. Environment

- Loss of area which is biodiverse and home to hundreds of threatened species.
- No assessment of the impact of development on the environment, especially on ancient woodland at Black Carr and Kit Woods.
- Building in it would be an ecological disaster.
- Detrimental loss to local fauna/flora and trees- threatened species – the area should be re wilded.

6. Alternative Sites

- Other brownfield sites and unsightly areas could be used for housing developments

7. Social Behaviour

- Highlighted the problems of crime and anti-social behaviour despite many initiatives and interventions undertaken by the Council over the years encountered with having such a large area of housing in one place.
- Increasing the volume of housing so close to Holme Wood estate will only increase these problems

8. Flood Risk

- Development will lead to flooding further down the valley.
- Flood risk assessment is vital

9. Infrastructure

- Demand on schools and other local services/insufficient capacity.
- The need for a field side footpath on Ned Lane for walkers.
- No public transport which will mean car dependent communities

10. Heritage

- Impact on listed buildings and the conservation area

11. Other comments

- Developing this area would destroy our house prices
- No appreciation of cultural, historical, recreational or environmental aspects

Support:

No Representations in Support

Comment:

1. **Flood risk**
   - Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.
2. **Green Belt**
   - Concerns about potential encroachment and reduction of the strategic green belt and scale of land required
3. **Infrastructure**
   - Potential impact on infrastructure provision in Leeds.
   - Concerns proposed road improvements on Tong Street would be sufficient.
4. **Alternative Options**
   - Request further justification that all other locations have been exhausted and potential other options had been exhausted.
   - One respondent commented that they were disappointed that not all their clients land had been allocated.

Representation IDs: 1306, 3662, 4998, 6181, 6192, 6214, 6223, 6232, 6241, 6250, 6259, 6268, 6277, 6288, 6297, 6306, 6315, 6335, 6344, 6357, 6366, 6375, 6384, 6393, 6408, 6434, 6444, 6453, 6463, 6490, 6499, 6508, 6517, 6526, 6537, 6546, 6558, 6567, 6579, 6590, 6601, 6610, 6619, 6628, 6638, 6648, 6658, 6675, 6686, 6711, 6722, 6732, 6745, 6769, 6778, 6787, 6801, 6814, 6841, 6853, 6867, 6877, 6888, 6901, 6915, 6929, 6941, 6953, 6959, 6970, 6980, 6991, 7001, 7010, 7020, 7033, 7047, 7060, 7069, 7092, 7103, 7112, 7121, 7150, 7168, 7178, 7232, 7253, 7262, 7279, 7292, 7301, 7311, 7322, 7331, 7339, 7348, 7358, 7370, 7379, 7389, 7403, 7413, 7429, 7442, 7456, 7465, 7476, 7486, 7499, 7509, 7523, 7539, 7548, 7558, 7566, 7575, 7583, 7593, 7602, 7611, 7620, 7629, 7638, 7647, 7657, 7666, 7676, 7686, 7695, 7705, 7715, 7725, 7735, 7744, 7753, 7762, 7771, 7782, 7791, 7800, 7811, 7832, 7841, 7861, 7874, 7883, 7893, 7902, 7912, 7929,

7938, 7956, 7971, 7980, 7989, 7998, 8019, 8029, 8039, 8048, 8057, 8076, 8175, 8203, 8211, 8219, 8227, 8234, 8243, 8257, 8262, 8272,
8285, 8295, 8304, 8313, 8323, 8339, 8347, 8358, 8367, 8379, 8388, 8396, 8408, 8437, 8446, 8456, 8465, 8473, 8481, 8492, 8500, 8508,
8516, 8524, 8532, 8540, 8548, 8557, 8567, 8580, 8591, 8600, 8608, 8616, 8625, 8639, 8649, 8661, 8673, 8681, 8691, 8700, 8709, 8720,
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8982, 8993, 9011, 9020, 9029, 9038, 9048, 9057, 9073, 9087, 9097, 9106, 9116, 9128, 9139, 9148, 9157, 9166, 9175, 9184, 9195, 9208,
9217, 9226, 9237, 9246, 9257, 9266, 9275, 9290, 9300, 9314, 9323, 9332, 9341, 9350, 9359, 9368, 9377, 9386, 9395, 9405, 9414, 9423,
9434, 9443, 9452, 9461, 9472, 9481, 9490, 9499, 9508, 9536, 9562, 9571, 9580, 9589, 9598, 9607, 9616, 9634, 9650, 9659, 9674, 9683,
9692, 9704, 9719, 9728, 9737, 9746, 9760, 9769, 9778, 9787, 9827, 9836, 9845, 9855, 9871, 9893, 9902, 9911, 9921, 9930, 9942, 9959,
9971, 9980, 9989, 9998, 10015, 10026, 10042, 10054, 10083, 10092, 10101, 10113, 10124, 10136, 10148, 10160, 10169, 10182, 10199,
10208, 10231, 10252, 10259, 10272, 10281, 10288, 10301, 10310, 10319, 10336, 10347, 10364, 10376, 10385, 10395, 10404, 10413, 10433,
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13982, 13998, 14011, 14022, 14033, 14042, 14051, 14060, 14069, 14087, 14096, 14105, 14122, 14131, 14140, 14149, 14158, 14167, 14180,
14189, 14198, 14214, 14223, 14232, 14246, 14256, 14265, 14274, 14283, 14292, 14305, 14320, 14329, 14338, 14347, 14356, 14365, 14381,
14390, 14399, 14408, 14417, 14426, 14435, 14444, 14453, 14462, 14470, 14479, 14488, 14500, 14509, 14518, 14527, 14536, 14545, 14554,
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15111, 15120, 15129, 15138, 15147, 15156, 15165, 15174, 15183, 15192, 15202, 15215, 15228, 15237, 15247, 15256, 15265, 15274, 15283,
15293, 15302, 15313, 15326, 15335, 15345, 15354, 15363, 15372, 15384, 15393, 15402, 15457, 15466, 15479, 15540, 15549, 15558, 15567,

15576, 15585, 15594, 15605, 15617, 15626, 15635, 15644, 15653, 15682, 15691, 15704, 15713, 15722, 15731, 15740, 15761, 15779, 15788,
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16937, 16946, 17011, 17021, 17032, 17042, 17051, 17062, 17079, 17088, 17105, 17147, 17179, 17188, 17199, 17208, 17217, 17231, 17245,
17254, 17270, 17279, 17307, 17316, 17332, 17345, 17354, 17363, 17372, 17381, 17390, 17400, 17412, 17426, 17435, 17444, 17460, 17475,
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19082, 19091, 19100, 19109, 19118, 19128, 19137, 19146, 19155, 19164, 19173, 19189, 19198, 19221, 19230, 19239, 19250, 19259, 19268,
19277, 19286, 19295, 19304, 19313, 19322, 19331, 19340, 19349, 19358, 19367, 19376, 19401, 19410, 19419, 19428, 19437, 19446, 19458,
19467, 19476, 19485, 19494, 19503, 19512, 19521, 19543, 19552, 19561, 19570, 19579, 19588, 19597, 19635, 19644, 19653, 19663, 19673,
19683, 19694, 19704, 19713, 19737, 19746, 19765, 19779, 19788, 19847, 19857, 19947, 19956, 19966, 19975, 19984, 19993, 20029, 20038,
20101, 20112, 20121, 20147, 20166, 20183, 20194, 20203, 20212, 20221, 20230, 20239, 20248, 20257, 20266, 20275, 20284, 20293, 20302,
20311, 20339, 20348, 20357, 20401, 20410, 20419, 20428, 20453, 20462, 20471, 20480, 20489, 20498, 20507, 20516, 20525, 20534, 20543,
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21471, 21504, 21513, 21522, 21531, 21540, 21549, 21558, 21567, 21576, 21595, 21625, 21678, 21687, 21705, 21714, 21723, 21732, 21741,
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23942, 23953, 23962, 23971, 23980, 23995, 24006, 24015, 24028, 24037, 24050, 24060, 24069, 24078, 24087, 24096, 24105, 24148, 24187,
24238, 24247, 24256, 24265, 24292, 24301, 24500, 24509, 24518, 24527, 24649, 24658, 24669, 24724, 24793, 24802, 24870, 24916, 25121,
25265, 25292, 25324, 25333, 25344, 25353, 25362, 25372, 25382, 25391, 25401, 25410, 25465, 25514, 25526, 25535, 25557, 25570, 25579,
25589, 25600, 25611, 25632, 25642, 25651, 25668, 25677, 25690, 26377, 26391, 26400, 26409, 26418, 26427, 26436, 26450, 26459, 26471,

26480, 26491, 26501, 26510, 26520, 26540, 26549, 26590, 26599, 26613, 26633, 26646, 26658, 26667, 26738, 26785, 27097, 27485, 27494, 27509, 27518, 27533, 27587, 27598, 27607, 27616, 27625, 27634, 27653, 27663, 27672, 27751, 27769, 27849, 27866, 27875, 27940, 27949, 27970, 27991, 28000, 28010, 28020, 28029, 28040, 28050, 28061, 28071, 28088, 28098, 28108, 28117, 28143, 28154, 28217, 28227, 28323, 28332, 28341, 28350, 28413, 28422, 28441, 28450, 28459, 28472, 28506, 28536, 28545, 28983, 29183, 29338, 29347, 29356, 29365, 29374, 29455, 29464, 29473, 29482, 29660, 29751, 29760, 29958, 29966, 29975, 30041

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE32/E: Euroway Trading Estate, Commondale Way	5	5	1	3	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on environment • Impact on infrastructure • Support from councillors for development • Flood risk – Zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a Employment allocation and identified as (E34) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Objections:

1. **Impact on Environment.**
   - Open space is needed.
   - Development will cause pollution
2. **Impact on Infrastructure**
   - Proposed dwellings will create access difficulties.
   - Insufficient schools and medical care.

Support:

1. **Support Development**
   - Ward Councillors fully support this site.
   - Sensible provided access and proximity to M606 can be addressed with Highways England.

• Support growth and employment.
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 982, 3049, 4092, 4884, 28938

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE33/E: Land East of Laisterdyke and South Leeds Road	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage impacts • Support for development • Flood risk – Zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a Employment allocation and identified as (E151) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Impact on Heritage**
   - 2-34 Mortimer Row, adjacent to the site is a terrace of Grade II Listed Buildings and development of this area could harm elements which contribute to the significance of this designated heritage asset. Considerations highlight that a buffer will be required to the north of the site in order to protect these assets.
   - Development proposals would need to ensure that those elements which contribute to the significance of this heritage asset are not harmed.
   - Add development consideration 'Development should conserve and, where possible, enhance those elements which contribute to the significance of the Grade II Listed 2-34 Mortimer Row.

Support:

1. **Support Development**

• This is a derelict site which could form a very useful employment zone near existing industrial sites, provided flooding can be mitigated.
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation ID: 4090, 28939, 29171

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE34/E: Land East of Sticker Lane	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on heritage asset • Flood risk – flood zone 1	• In terms of flood risk, the appropriate drainage and mitigation measures (if required) would be expected as part of any future development.

Objections:
1. Impact on Heritage • Grade II adjacent.
Support:
No Representations in Support
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation ID: 4892, 28940

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE35/E: Lower Lane, Parry Lane and Sticker Lane	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for allocation • Flood risk – flood zone 1	• In terms of flood risk, the appropriate drainage and mitigation measures (if required) would be expected as part of any future development.

Objections:
No objections
Support:
1. Support Development • Sensible infill.
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 4089, 28941

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE36/E: Parry Lane	4	4	0	2	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for mitigation of environmental impacts • Support for employment use • Flood risk – Zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as E36) is not carried forward as a preferred option

Support:

1. **Environmental Impact**
   - Provided adequate provision is made to protect the watercourse and water quality, and compensation works are carried out elsewhere for loss of natural environment, this is a sensible proposal.
2. **Employment Use**
   - Potentially more employment in this area

Comment:

1. **Development Phasing**
   - Whilst it is indicated that the 'site is subject to a detailed work programme with redevelopment underway', the 'Parry Lane' site (SE36/E) which extends to 4.9ha (7% of total supply), is understood to have been vacant since 2008 (or longer). Whilst the allocation of this site is not challenged, a realistic view should be taken on the likelihood, scale and timing of delivery of development.
2. **Flood risk**
   - Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 4087, 4895, 18084, 28942

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE37/E: North of Westgate Hill/ West of Tong Lane	1522	1503	1517	1	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on highways • Impact on health • Flood risk – Zone 1 • Impact on house prices • Environmental impacts • Lack of brownfield land used • Impact on local business • General comments • Support for allocation	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a Employment allocation and identified as (E57) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Green Belt • the site is green belt and its allocation would be undemocratic on the basis that not been one survey, or opinion poll taken in Bradford, which agrees with Bradford Councils views on building on green belt and impact on listed buildings. • Green Belt exceptional circumstances have not been demonstrated, no appreciation of cultural, historical, recreational or environmental aspects.
2. Highways • No information provided on road impact. New road building is inconsistent with the Council's declaration of a climate emergency in 2019. Concern that road will release further development sites, increase air pollution and traffic.

- Unclear whether the development of the site would be dependent on SEBAR and the impact of the road on communities with regard severance, noise and air quality
- The access off the roundabout would not be sufficient for both an industrial development and 1000+ homes.

3. Health

- Area provides access to green space for walking, running, cycling and horse-riding etc. Its development will impact health.
- Development would increase air pollution and congestion on Tong Street and wider area

4. Flooding

- Development will lead to flooding further down the valley. Flood risk assessment is vital

5. Housing

- Impact on house prices

6. Environment

- Area is biodiverse and home to hundreds of threatened species. No assessment of the impact of development on the environment, especially on ancient woodland at Black Carr and Kit Woods. Building in it would be an ecological disaster.
- Loss of trees, fauna and flora and area for farming

7. Infrastructure

- Lack of infrastructure- schools, doctors, dentists

8. Brownfield

- Ample other brownfield sites in the District which should be prioritised

9. Local businesses

- Potential loss of current business and impact on Tong Garden centre.

10. General Comments

- No consideration of the effects of the pandemic and Brexit. The 2021 census should inform future planning policy.
- The estate is plagued by anti-social behaviour and the allocation of the site would do little to bring targeted benefits to Holme Wood
- Loss of buffer between cities
- Loss of land will be detrimental to children learning about nature and scouting
- Constraints of the site outweigh the benefits

Support:

1. General support

• Support for proposed site allocation
Comment:
1. Flooding • the site is situated in Flood Zone 1 (FZ1) and provided guidance on appropriate flooding mitigation measures and surface water discharge rates that would be required.
2. General comment • Would wish to see justification that other options for new employment had been exhausted to justify this site. They wished to reserve judgement on the highway improvements until further evidence is provided. • Support the allocation subject to a marginal increase

Representation IDs: 753, 3656, 4084, 6173, 6193, 6215, 6224, 6233, 6242, 6251, 6260, 6269, 6278, 6289, 6298, 6307, 6316, 6336, 6345, 6358, 6367, 6376, 6385, 6394, 6409, 6435, 6445, 6454, 6465, 6491, 6500, 6509, 6518, 6527, 6538, 6547, 6559, 6568, 6580, 6591, 6602, 6611, 6620, 6629, 6639, 6649, 6659, 6676, 6688, 6712, 6723, 6733, 6746, 6770, 6779, 6788, 6802, 6816, 6842, 6855, 6868, 6878, 6889, 6902, 6916, 6930, 6942, 6954, 6971, 6981, 6992, 7002, 7012, 7021, 7034, 7049, 7061, 7070, 7093, 7104, 7113, 7122, 7152, 7170, 7181, 7238, 7259, 7272, 7281, 7293, 7302, 7312, 7328, 7332, 7345, 7354, 7364, 7376, 7380, 7390, 7404, 7414, 7430, 7443, 7457, 7466, 7477, 7487, 7500, 7510, 7524, 7540, 7549, 7564, 7572, 7576, 7589, 7594, 7603, 7612, 7621, 7630, 7639, 7648, 7658, 7667, 7677, 7687, 7696, 7706, 7716, 7726, 7736, 7745, 7754, 7763, 7772, 7783, 7792, 7801, 7812, 7826, 7833, 7842, 7862, 7875, 7884, 7894, 7903, 7913, 7930, 7939, 7957, 7972, 7981, 7990, 7999, 8020, 8030, 8040, 8049, 8058, 8077, 8172, 8204, 8217, 8225, 8235, 8249, 8251, 8268, 8278, 8282, 8291, 8296, 8305, 8314, 8329, 8344, 8353, 8359, 8368, 8380, 8389, 8402, 8409, 8438, 8447, 8457, 8466, 8479, 8487, 8498, 8506, 8514, 8522, 8530, 8538, 8546, 8554, 8563, 8573, 8586, 8597, 8606, 8614, 8622, 8631, 8645, 8655, 8667, 8679, 8687, 8697, 8706, 8715, 8726, 8732, 8741, 8750, 8770, 8787, 8802, 8811, 8828, 8838, 8847, 8856, 8870, 8879, 8888, 8897, 8910, 8919, 8930, 8939, 8949, 8962, 8973, 8983, 8994, 9012, 9021, 9030, 9039, 9049, 9058, 9074, 9088, 9098, 9107, 9117, 9129, 9140, 9149, 9158, 9167, 9176, 9185, 9196, 9209, 9218, 9227, 9238, 9247, 9258, 9267, 9276, 9291, 9301, 9315, 9324, 9333, 9342, 9351, 9360, 9369, 9378, 9387, 9396, 9406, 9415, 9424, 9435, 9444, 9453, 9462, 9473, 9482, 9491, 9500, 9509, 9537, 9563, 9572, 9581, 9590, 9599, 9608, 9617, 9635, 9651, 9660, 9675, 9684, 9693, 9705, 9720, 9729, 9738, 9747, 9761, 9770, 9779, 9788, 9828, 9837, 9846, 9856, 9872, 9894, 9903, 9912, 9922, 9931, 9943, 9960, 9972, 9981, 9990, 9999, 10016, 10027, 10050, 10055, 10084, 10093, 10102, 10114, 10125, 10137, 10149, 10161, 10170, 10183, 10200, 10209, 10232, 10253, 10260, 10273, 10282, 10289, 10302, 10311, 10320, 10337, 10348, 10365, 10377, 10386, 10396, 10405, 10414, 10442, 10451, 10459, 10465, 10480, 10495, 10511, 10525, 10536, 10551, 10560, 10573, 10582, 10591, 10600, 10609, 10620, 10634, 10645, 10658, 10668, 10683, 10694, 10708, 10717, 10727, 10739, 10748, 10772, 10782, 10792, 10802, 10811, 10821, 10835, 10846, 10856, 10868, 10879, 10888, 10901, 10910, 10923, 10988, 11008, 11021, 11040, 11048, 11079, 11092, 11101, 11111, 11124, 11133, 11142, 11151, 11160, 11169,

11178, 11187, 11196, 11205, 11210, 11221, 11222, 11231, 11240, 11271, 11289, 11302, 11314, 11324, 11334, 11343, 11356, 11426, 11438,
11442, 11455, 11473, 11487, 11514, 11525, 11534, 11561, 11581, 11599, 11613, 11632, 11643, 11659, 11670, 11681, 11696, 11709, 11718,
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13539, 13548, 13557, 13566, 13575, 13599, 13608, 13617, 13626, 13635, 13644, 13653, 13666, 13675, 13684, 13693, 13704, 13725, 13734,
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14150, 14159, 14168, 14181, 14190, 14199, 14215, 14224, 14233, 14247, 14257, 14266, 14275, 14284, 14293, 14306, 14321, 14330, 14339,
14348, 14357, 14366, 14382, 14391, 14400, 14409, 14418, 14427, 14436, 14445, 14454, 14463, 14471, 14480, 14489, 14501, 14510, 14519,
14528, 14537, 14546, 14555, 14564, 14573, 14587, 14596, 14605, 14614, 14623, 14632, 14642, 14651, 14660, 14669, 14678, 14687, 14696,
14706, 14715, 14733, 14742, 14751, 14760, 14769, 14778, 14788, 14797, 14806, 14815, 14824, 14833, 14845, 14851, 14857, 14866, 14875,
14885, 14894, 14909, 14918, 14933, 14946, 14956, 14965, 14974, 14983, 14992, 15002, 15011, 15020, 15031, 15040, 15049, 15058, 15067,
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18570, 18580, 18589, 18598, 18607, 18616, 18625, 18634, 18643, 18654, 18665, 18674, 18683, 18692, 18701, 18726, 18735, 18754, 18789, 18798, 18807, 18816, 18827, 18836, 18845, 18854, 18873, 18882, 18891, 18963, 18972, 18981, 18990, 18999, 19008, 19017, 19026, 19035, 19046, 19055, 19064, 19074, 19083, 19092, 19101, 19110, 19119, 19129, 19138, 19147, 19156, 19165, 19174, 19191, 19200, 19223, 19232, 19241, 19252, 19261, 19270, 19279, 19288, 19297, 19306, 19315, 19324, 19333, 19342, 19350, 19359, 19368, 19377, 19403, 19412, 19421, 19430, 19439, 19448, 19460, 19469, 19478, 19487, 19496, 19505, 19514, 19523, 19545, 19554, 19563, 19571, 19580, 19589, 19598, 19636, 19645, 19654, 19664, 19674, 19684, 19695, 19705, 19714, 19738, 19747, 19766, 19780, 19789, 19848, 19858, 19948, 19957, 19967, 19976, 19985, 19994, 20031, 20040, 20102, 20113, 20122, 20148, 20167, 20184, 20196, 20205, 20214, 20223, 20232, 20241, 20250, 20259, 20268, 20277, 20286, 20295, 20304, 20313, 20341, 20350, 20359, 20403, 20412, 20421, 20430, 20455, 20464, 20473, 20482, 20491, 20500, 20509, 20518, 20527, 20536, 20545, 20554, 20563, 20572, 20592, 20601, 20610, 20619, 20627, 20637, 20646, 20655, 20664, 20673, 20681, 20690, 20705, 20714, 20723, 20732, 20741, 20773, 20783, 20792, 20801, 20810, 20819, 20829, 20838, 20847, 20856, 20864, 20873, 20882, 20892, 20901, 20910, 20919, 20927, 20936, 20946, 20955, 20964, 20973, 20982, 20990, 21005, 21026, 21035, 21050, 21078, 21090, 21108, 21121, 21141, 21150, 21165, 21188, 21208, 21217, 21226, 21237, 21247, 21263, 21272, 21290, 21299, 21308, 21317, 21326, 21335, 21344, 21353, 21426, 21437, 21446, 21455, 21464, 21473, 21506, 21515, 21524, 21533, 21542, 21551, 21560, 21569, 21578, 21596, 21626, 21679, 21688, 21706, 21715, 21724, 21733, 21742, 21769, 21795, 21820, 21835, 21844, 21859, 21871, 22175, 22393, 22402, 22411, 22420, 22429, 22438, 22447, 22585, 22772, 22841, 23082, 23091, 23100, 23464, 23491, 23503, 23513, 23523, 23532, 23541, 23550, 23559, 23568, 23579, 23594, 23682, 23693, 23702, 23711, 23724, 23733, 23742, 23754, 23772, 23786, 23799, 23808, 23820, 23829, 23845, 23854, 23876, 23885, 23895, 23904, 23913, 23922, 23934, 23943, 23954, 23963, 23972, 23981, 23996, 24007, 24016, 24029, 24038, 24051, 24061, 24070, 24079, 24088, 24097, 24106, 24149, 24188, 24239, 24248, 24257, 24266, 24293, 24302, 24501, 24510, 24519, 24528, 24650, 24659, 24670, 24725, 24794, 24803, 24871, 24917, 25122, 25266, 25298, 25325, 25334, 25345, 25354, 25363, 25373, 25383, 25392, 25402, 25411, 25466, 25515, 25527, 25536, 25558, 25566, 25571, 25580, 25590, 25601, 25612, 25633, 25643, 25652, 25669, 25678, 25691, 26378, 26392, 26401, 26410, 26419, 26428, 26437, 26451, 26460, 26472, 26481, 26492, 26502, 26511, 26521, 26541, 26550, 26591, 26600, 26614, 26634, 26647, 26659, 26668, 26739, 26786, 27098, 27486, 27495, 27510, 27519, 27534, 27589, 27600, 27609, 27618, 27627, 27636, 27654, 27665, 27674, 27752, 27770, 27850, 27867, 27876, 27941, 27950, 27971, 27992, 28001, 28011, 28021, 28030, 28041, 28051, 28062, 28072, 28089, 28099, 28109, 28118, 28133, 28134, 28144, 28155, 28218, 28228, 28325, 28334, 28342, 28351, 28415, 28424, 28443, 28452, 28461, 28473, 28507, 28537, 28546, 28943, 29172, 29340, 29349, 29358, 29367, 29376, 29457, 29466, 29475, 29484, 29669, 29753, 29762, 29968, 29977, 30047

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE38/E: Nufarm, Wyke Lane	4	4	1	2	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage impacts • Support for development • Flood risk – Zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as E58) is not carried forward as a preferred option.

Objections:

1. **Impact on Heritage**
   - An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.
   - If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.
   - If it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm

Support:

1. **Support Development**
   - Exciting company potential employment opportunities
   - For consistency throughout the draft Plan, it is suggested that all references to 'AH Marks Works' are changed to 'Nufarm UK Ltd factory'.
   - It is agreed that this site should not contribute to (i.e. it is additional to) the meeting the identified requirement for employment land.

Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 4898, 18085, 28944, 29174

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE39/E: Neville Road / Lower Lane	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a Employment allocation and identified as (E59) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No objections
Support:
No Representations in Support
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation ID: 28945

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE40/E: Staithgate Lane North	6	6	2	2	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Alternative sites • Impact on Infrastructure • Environmental safety • Support from councillors for development • Comments on woodland habitat	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a Employment allocation and identified as (E152) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Objections:

1. **Alternative Sites**
   - Other brownfield site are said to be available.
2. **Impact on Infrastructure**
   - The infrastructure and Highway is limited by geographical constraints and it is unclear whether the site access will necessitate structural attention to crossing the Bowling Tunnel or through existing residential area with all of the impact considered in an EIA Screen Constraints and Opportunities.
3. **Environmental Safety**
   - Objection to the allocation of this site for employment use raising issues including relating to EIA screening and scoping, combined impacts with other sites, to its position within the outer HSE zone, to site access, obstruction of access for emergency services to Bowling Tunnel, former landfill and mining, required site remediation and surface water. Reference is made to a range of environmental impacts including on a green corridor, on nearby heritage assets, on public open space designation, on semi ancient woodland, on wildlife and wildlife habitats.

- This site forms an important Green Corridor and when taken in conjunction with SE40/E and SE42/E and when taken in conjunction with existing housing presents significant Environmental Impact to Odsal Woods a Deciduous semi ancient woodland (Odsal Wood) immediately north-west of site.
- The site is a landfill location, and a significant proportion of the site is within a landfill buffer. Significant Constraints are associated with landfill to ensure Environmental Regulations are complied with.

Support:

1. Support Development

- Ward Councillors fully support this site.
- Needs site access to be obtained and clear

Comment:

1. Woodland Habitat

- This site lies immediately adjacent to Odsal Wood Local Wildlife Site and ancient woodland (irreplaceable habitat) and is near to Railway Terrace and Raw Nook Local Nature Reserve and Local Wildlife Site and Toad Holes Beck, Local Wildlife Site. These areas must be protected from any direct or indirect impacts as a result of development, including cumulative impacts and should seek to enhance the condition of all sites and connectivity between them.

2. Flood risk

- Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation ID: 983, 4686, 4710, 4905, 11571, 28946

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE41/E: Westgate Hill Street	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage impacts • Development on Green Belt land • Support for development • Flood risk – Zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a Employment allocation and identified as (E61) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Heritage • The new road and housing plans directly effect a Grade II house and land.
2. Green Belt • Green Belt should prevent urban expansion – in the case of Bradford to stop it becoming part of Leeds. • It's completely undemocratic to pour cement and tarmac all over the green belt in Tong.
Support:
1. Support Development • Sensible in filling of gap next to existing industrial development, provided infrastructure can support this.
Comment:
1. Flood risk

- Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 3657, 4086, 28947

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE42/E: Staithgate Lane South	4	4	2	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on environmental safety • Highway constraints • Alternative sites • Support for development • Flood risk – Zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a Employment allocation and identified as (E152) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Objections:

1. **Impact on Environment/Environmental Safety.**
   - This site forms an important Green Corridor and when taken in conjunction with SE40/E and SE42/E and when taken in conjunction with existing housing presents significant Environmental Impact to Odsal Woods a Deciduous semi ancient woodland (Odsal Wood) immediately north-west of site.
   - The site is a landfill location, and a significant proportion of the site is within a landfill buffer. Significant Constraints are
   - associated with landfill to ensure Environmental Regulations are complied with.
   - Objection raises issues including relating to EIA screening and scoping, combined impacts with other sites, to its position within the outer HSE zone, to site access, obstructed access, Bowling railway tunnel, former mining and landfill, surface water / water bodies. Reference is made to a range of environmental impacts including on water quality, on a green corridor, on nearby heritage assets, on priority wildlife habitats, on locally designated nature sites, on deciduous woodland, on open space.
2. **Highway/Access Constraints**

• The infrastructure and Highway is limited by geographical constraints and it is unclear whether the site access will necessitate structural attention to crossing the Bowling Tunnel or through existing residential area with all of the impact considered in an EIA Screen Constraints and Opportunities
3. Alternative Sites Other brownfield site are available.
Support:
1. **Support Development** • Ward Councillors fully support this site
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 984, 4714, 4724, 28948

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE43/E: Dick Lane	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for allocation • Flood risk – flood zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as E63) is not carried forward as a preferred option.

Objections:
No objections
Support:
1. **Support Development** • Makes sense given it adjoins existing employment site.
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation IDs: 4093, 28949

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE44/E: Shetcliffe Lane	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for site allocation • Planning application approval • Flood risk - flood zone 1	• In terms of flood risk, the appropriate drainage and mitigation measures (if required) would be expected as part of any future development.

Objections:
No objections
Support:
1. **Support Development** • A planning application has recently been approved here therefore it is easily deliverable.
Comment:
1. Flood risk • Site is flood zone 1- Environment Agency guidance on mitigation measures should be followed to support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.

Representation ID: 4992, 28950

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE45/H: Holme Lane/Raikes Lane	1516	1500	1513	0	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on highways • Environmental impacts • Flood Risk – Zone 1 • Impact on house prices • Lack on infrastructure • Lack of brownfield usage • Loss of open space • General comment	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H997 in the Regulation 19 Local Plan. In this plan the site name was corrected to Harper Gate Farm, Tyersal. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Green Belt • site is green belt and its allocation would be undemocratic on the basis that not been one survey, or opinion poll taken in Bradford, which agrees with Bradford Councils views on building on green belt and impact on listed buildings. • Green Belt exceptional circumstances have not been demonstrated, no appreciation of cultural, historical, recreational or environmental aspects.
2. Highways • highway improvements to Ned Lane did not include a pavement for safe pedestrian access between Tyersal Lane and the defined footpath "Tong 8"

- Unclear whether the development of the site would be dependent on SEBAR and the impact of the road on communities with regard severance, noise and air quality.

3. Environment

- No information provided on road impact. New road building is inconsistent with the Council's declaration of a climate emergency in 2019. Concern that road will release further development sites, increase air pollution and traffic.
- Area is biodiverse and home to hundreds of threatened species. No assessment of the impact of development on the environment, especially on ancient woodland at Black Carr and Kit Woods. Building in it would be an ecological disaster
- Loss of trees, fauna and flora and area for farming

4. Flooding

- Development will lead to flooding further down the valley. Flood risk assessment is vital

5. Housing

- Impact on house prices

6. Infrastructure

- Lack of infrastructure- schools, doctors, dentists
- Loss of buffer between cities

7. Brownfield

- Ample other brownfield sites in the District which should be prioritised

8. Health

- Area provides access to green space for walking, running, cycling and horse-riding etc. Its development will impact health
- Development would increase air pollution and congestion on Tong Street and wider area

9. General Comment

- No consideration of the effects of the pandemic and Brexit. The 2021 census should inform future planning policy.
- The estate is plagued by anti-social behaviour and the allocation of the site would do little to bring targeted benefits to Holme Wood
- Loss of land will be detrimental to children learning about nature and scouting

Support:

No comment in support.

Comment:

1. Flooding

• The site is situated in Flood Zone 1 (FZ1) and provided guidance on appropriate flooding mitigation measures and surface water discharge rates that would be required.
2. Green Belt • Concerned about potential encroachment and reduction of the strategic green belt and scale of land required with potential impact on infrastructure provision on Leeds. Further justification that all other locations have been exhausted. Would like to see that all potential other options had been exhausted first. Comments reserved on whether proposed road improvements on Tong Street would be sufficient.
3. General comment • Welcome site allocation but commented that they were disappointed that the full extent of the site had not been allocated.

Representation IDs: 1308, 3663, 4997, 5476, 6182, 6194, 6216, 6225, 6234, 6243, 6252, 6261, 6270, 6279, 6290, 6299, 6308, 6317, 6337, 6346, 6359, 6368, 6377, 6386, 6395, 6410, 6436, 6446, 6455, 6466, 6492, 6501, 6510, 6519, 6528, 6539, 6548, 6560, 6569, 6581, 6592, 6603, 6612, 6621, 6630, 6640, 6650, 6660, 6677, 6689, 6713, 6724, 6734, 6747, 6771, 6780, 6789, 6803, 6819, 6843, 6857, 6869, 6879, 6890, 6903, 6918, 6931, 6943, 6955, 6957, 6972, 6982, 6993, 7003, 7013, 7022, 7037, 7050, 7062, 7071, 7094, 7105, 7114, 7123, 7154, 7171, 7184, 7231, 7252, 7261, 7283, 7294, 7303, 7313, 7321, 7333, 7338, 7347, 7357, 7369, 7381, 7391, 7405, 7415, 7431, 7444, 7458, 7467, 7478, 7488, 7501, 7511, 7525, 7541, 7550, 7557, 7565, 7577, 7582, 7595, 7604, 7613, 7622, 7631, 7640, 7649, 7659, 7668, 7678, 7688, 7697, 7707, 7717, 7727, 7737, 7746, 7755, 7764, 7773, 7784, 7793, 7802, 7813, 7834, 7843, 7863, 7876, 7885, 7895, 7904, 7914, 7931, 7940, 7958, 7973, 7982, 7991, 8000, 8021, 8031, 8041, 8050, 8059, 8078, 8205, 8210, 8218, 8226, 8236, 8242, 8259, 8261, 8270, 8284, 8297, 8306, 8315, 8322, 8338, 8346, 8360, 8369, 8381, 8390, 8395, 8410, 8439, 8448, 8458, 8467, 8472, 8480, 8491, 8499, 8507, 8515, 8523, 8531, 8539, 8547, 8556, 8566, 8579, 8590, 8599, 8607, 8615, 8624, 8638, 8648, 8660, 8672, 8680, 8690, 8699, 8708, 8719, 8733, 8742, 8751, 8771, 8788, 8803, 8812, 8829, 8839, 8848, 8857, 8871, 8880, 8889, 8898, 8911, 8920, 8931, 8940, 8950, 8963, 8974, 8984, 8995, 9013, 9022, 9031, 9040, 9050, 9059, 9075, 9089, 9099, 9108, 9118, 9130, 9141, 9150, 9159, 9168, 9177, 9186, 9197, 9210, 9219, 9228, 9239, 9248, 9259, 9268, 9277, 9292, 9302, 9316, 9325, 9334, 9343, 9352, 9361, 9370, 9379, 9388, 9397, 9407, 9416, 9425, 9436, 9445, 9454, 9463, 9474, 9483, 9492, 9501, 9510, 9538, 9564, 9573, 9582, 9591, 9600, 9609, 9618, 9636, 9652, 9661, 9676, 9685, 9694, 9706, 9721, 9730, 9739, 9748, 9762, 9771, 9780, 9789, 9829, 9838, 9847, 9857, 9873, 9895, 9904, 9913, 9923, 9932, 9944, 9961, 9973, 9982, 9991, 10000, 10017, 10028, 10043, 10056, 10085, 10094, 10103, 10115, 10126, 10138, 10150, 10162, 10171, 10184, 10201, 10210, 10233, 10254, 10261, 10274, 10283, 10291, 10303, 10312, 10321, 10338, 10349, 10366, 10378, 10387, 10397, 10406, 10415, 10431, 10443, 10452, 10466, 10481, 10496, 10512, 10526, 10537, 10552, 10561, 10574, 10583, 10592, 10601, 10610, 10622, 10635, 10646, 10660, 10669, 10684, 10695, 10709, 10718, 10728, 10740, 10749, 10773, 10783, 10793, 10795, 10804, 10814, 10828, 10839, 10849, 10861, 10872, 10881, 10894, 10903, 10916, 10989, 11007, 11020, 11039, 11047, 11078, 11091, 11100, 11110, 11123, 11132, 11141, 11150, 11159, 11168, 11177, 11186, 11195, 11204, 11211, 11223, 11232, 11241, 11272, 11290, 11301, 11313, 11323, 11333, 11342, 11355, 11425, 11437, 11443, 11456, 11474, 11486, 11513, 11524, 11533, 11562, 11582, 11600, 11614, 11633, 11644, 11660, 11671, 11682, 11688, 11697, 11710, 11719,

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Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE46/H: Land West of Tong Lane and east of Holme Wood	1523	1507	1519	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Landscape impact • Other site • Impact on highways • Impact on health • Lack of infrastructure • Environmental impacts • Flood risk – Zone 1 • Impact on house prices • General comments	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified, alongside SE19/H, SE47/H & SE48/H, as part of H911, in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Green Belt • the site is green belt and its allocation would be undemocratic on the basis that not been one survey, or opinion poll taken in Bradford, which agrees with Bradford Councils views on building on green belt and impact on listed buildings. • Green Belt exceptional circumstances have not been demonstrated, no appreciation of cultural, historical, recreational or environmental aspects.
2. Landscape

- Development would have a major impact on the view from path 8 toward Kit Woods and Fulneck and if approved asked for the retention of a segregated path be maintained with as much of the open rural view as possible with a much-improved surface.

3. Other sites

- Ample other brownfield sites in the District which should be prioritised

4. Highways

- No information provided on road impact. New road building is inconsistent with the Council's declaration of a climate emergency in 2019. Concern that road will release further development sites, increase air pollution and traffic.
- Unclear whether the development of the site would be dependent on SEBAR and the impact of the road on communities with regard severance, noise and air quality

5. Health

- Area provides access to green space for walking, running, cycling and horse-riding etc. Its development will impact health.
- Development would increase air pollution and congestion on Tong Street and wider area

6. Infrastructure

- Lack of infrastructure- schools, doctors, dentists

7. Environment

- Area is biodiverse and home to hundreds of threatened species. No assessment of the impact of development on the environment, especially on ancient woodland at Black Carr and Kit Woods. Building in it would be an ecological disaster.
- Loss of trees, fauna and flora and area for farming

8. Flooding

- Development will lead to flooding further down the valley. Flood risk assessment is vital

9. Housing

- Impact on house prices

10. General Comment

- No consideration of the effects of the pandemic and Brexit. The 2021 census should inform future planning policy.
- The estate is plagued by anti-social behaviour and the allocation of the site would do little to bring targeted benefits to Holme Wood
- Loss of buffer between cities
- Loss of land will be detrimental to children learning about nature and scouting

Support:

1. General Comment

- supported the inclusion of the site and confirmed the land was available and deliverable and referred to further information provided.

Comment:

1. Flooding

- the site is situated in Flood Zone 1 (FZ1) and provided guidance on appropriate flooding mitigation measures and surface water discharge rates that would be required.

2. General comment

- Concerned about potential encroachment and reduction of the strategic green belt and scale of land required with potential impact on infrastructure provision on Leeds. Further justification that all other locations have been exhausted. Would like to see that all potential other options had been exhausted first. Comments reserved on whether proposed road improvements on Tong Street would be sufficient.

Representation IDs: 1354, 3079, 3664, 4996, 6183, 6195, 6217, 6226, 6235, 6244, 6253, 6262, 6274, 6280, 6291, 6300, 6309, 6318, 6338, 6347, 6360, 6369, 6378, 6387, 6396, 6411, 6437, 6447, 6456, 6467, 6493, 6502, 6511, 6520, 6529, 6540, 6549, 6561, 6570, 6582, 6593, 6604, 6616, 6622, 6631, 6642, 6651, 6661, 6678, 6690, 6714, 6725, 6735, 6748, 6772, 6781, 6790, 6804, 6820, 6844, 6859, 6870, 6880, 6891, 6904, 6920, 6932, 6944, 6956, 6965, 6973, 6983, 6994, 7004, 7014, 7023, 7039, 7053, 7063, 7072, 7095, 7106, 7115, 7124, 7155, 7172, 7186, 7235, 7256, 7265, 7284, 7295, 7304, 7317, 7325, 7334, 7342, 7351, 7361, 7373, 7382, 7392, 7406, 7416, 7432, 7445, 7459, 7468, 7479, 7489, 7502, 7512, 7526, 7542, 7551, 7561, 7569, 7578, 7586, 7596, 7605, 7614, 7623, 7632, 7641, 7650, 7660, 7669, 7679, 7689, 7698, 7708, 7718, 7728, 7738, 7747, 7756, 7765, 7774, 7785, 7794, 7803, 7814, 7835, 7844, 7864, 7877, 7886, 7896, 7905, 7915, 7932, 7941, 7959, 7974, 7983, 7992, 8001, 8022, 8032, 8042, 8051, 8060, 8079, 8174, 8206, 8214, 8222, 8231, 8237, 8246, 8265, 8271, 8277, 8288, 8298, 8307, 8316, 8326, 8342, 8350, 8361, 8370, 8382, 8391, 8399, 8411, 8440, 8449, 8459, 8468, 8476, 8484, 8495, 8503, 8511, 8519, 8527, 8535, 8543, 8551, 8560, 8570, 8583, 8594, 8603, 8611, 8619, 8628, 8642, 8652, 8664, 8676, 8684, 8694, 8703, 8712, 8723, 8734, 8743, 8752, 8772, 8789, 8804, 8813, 8830, 8840, 8849, 8858, 8872, 8881, 8890, 8899, 8912, 8921, 8932, 8941, 8951, 8964, 8975, 8985, 8996, 9014, 9023, 9032, 9041, 9051, 9060, 9076, 9090, 9100, 9109, 9119, 9131, 9142, 9151, 9160, 9169, 9181, 9187, 9198, 9211, 9220, 9229, 9240, 9249, 9260, 9269, 9278, 9293, 9303, 9317, 9326, 9335, 9344, 9353, 9362, 9371, 9380, 9389, 9398, 9408, 9417, 9426, 9437, 9446, 9455, 9464, 9475, 9484, 9493, 9502, 9511, 9539, 9565, 9574, 9583, 9592, 9601, 9610, 9619, 9637, 9653, 9662, 9677, 9686, 9695, 9707, 9722, 9731, 9740, 9749, 9763, 9772, 9781, 9790, 9830, 9839, 9848, 9858, 9874, 9896, 9905, 9914, 9924, 9933, 9945, 9962, 9974, 9983, 9992, 10001, 10018, 10029, 10044, 10057, 10086, 10095, 10104, 10116, 10127, 10139, 10151, 10163, 10172, 10185, 10205, 10211, 10234, 10255, 10262, 10275, 10284, 10292, 10304, 10313, 10322, 10339, 10350, 10367, 10379, 10388, 10398, 10407, 10416, 10436, 10444, 10453, 10467, 10482, 10497, 10513, 10527, 10538, 10553, 10562, 10575, 10584, 10593, 10602, 10611, 10623, 10636, 10647, 10661, 10670, 10685, 10696, 10710, 10719, 10730, 10741, 10750, 10774, 10784, 10794, 10799, 10808, 10818, 10832, 10843, 10853, 10865, 10876, 10885, 10898, 10907, 10920, 10990, 11009, 11022, 11041, 11049, 11080, 11093, 11102, 11112, 11125, 11134, 11143, 11152, 11161,

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Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE47/H: Westgate Hill Street, Holme Wood	1522	1505	1517	1	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on highways • Impact on health • Flood risk – Zone 1 • Impact on house prices • Environmental impact • Lack of infrastructure • Alternative sites • General comments • General support • Land use	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified, alongside SE19/H, SE46/H & SE48/H, as part of H911, in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Green Belt • the site is green belt and its allocation would be undemocratic on the basis that not been one survey, or opinion poll taken in Bradford, which agrees with Bradford Councils views on building on green belt and impact on listed buildings. • Green Belt exceptional circumstances have not been demonstrated, no appreciation of cultural, historical, recreational or environmental aspects.
2. Highways

- No information provided on road impact. New road building is inconsistent with the Council's declaration of a climate emergency in 2019. Concern that road will release further development sites, increase air pollution and traffic.
- Unclear whether the development of the site would be dependent on SEBAR and the impact of the road on communities with regard severance, noise and air quality

3. Health

- Area provides access to green space for walking, running, cycling and horse-riding etc. Its development will impact health.
- Development would increase air pollution and congestion on Tong Street and wider area

4. Flooding

- Development will lead to flooding further down the valley. Flood risk assessment is vital

5. Housing

- Impact on house prices

6. Environment

- Area is biodiverse and home to hundreds of threatened species. No assessment of the impact of development on the environment, especially on ancient woodland at Black Carr and Kit Woods. Building in it would be an ecological disaster.
- Loss of trees, fauna and flora and area for farming

7. Infrastructure

- Lack of infrastructure- schools, doctors, dentists

8. Other sites

- Ample other brownfield sites in the District which should be prioritised

9. General Comments

- No consideration of the effects of the pandemic and Brexit. The 2021 census should inform future planning policy.
- The estate is plagued by anti-social behaviour and the allocation of the site would do little to bring targeted benefits to Holme Wood
- Loss of buffer between cities
- Loss of land will be detrimental to children learning about nature and scouting

Support:

1. General Support

- supported the inclusion of the site and confirmed the land was available and deliverable and referred to further information provided.

Comment:

1. Flooding

• site is situated in Flood Zone 1 (FZ1) and provided guidance on appropriate flooding mitigation measures and surface water discharge rates that would be required.
2. Additional site • the allocation could be revised to include an additional area of land for further residential development
3. Land Use • The site appears to be on “best and most versatile agricultural land” and commented that the plan should be safeguarding this land (NPPF para 170). They recommended that an ALC survey would be required to determine soil resource and handling
4. General comment • concerned about potential encroachment and reduction of the strategic green belt and scale of land required and potential impact on infrastructure provision in Leeds. And request that see further justification that all other locations have been exhausted. Would like to see that all potential other options had been exhausted first. Wish to reserve comments on whether proposed road improvements on Tong Street would be sufficient.

Representation IDs: 3666, 4994, 6184, 6198, 6218, 6227, 6236, 6245, 6254, 6263, 6271, 6281, 6292, 6301, 6310, 6320, 6339, 6349, 6361, 6370, 6379, 6388, 6399, 6412, 6438, 6448, 6457, 6468, 6494, 6503, 6512, 6521, 6530, 6541, 6550, 6562, 6571, 6583, 6594, 6605, 6613, 6623, 6632, 6643, 6652, 6664, 6679, 6691, 6715, 6726, 6736, 6749, 6773, 6782, 6791, 6805, 6821, 6845, 6860, 6871, 6881, 6892, 6905, 6924, 6933, 6945, 6958, 6967, 6974, 6984, 6995, 7005, 7015, 7024, 7040, 7055, 7064, 7073, 7096, 7107, 7116, 7125, 7156, 7173, 7188, 7236, 7257, 7267, 7285, 7296, 7305, 7314, 7326, 7335, 7343, 7352, 7362, 7374, 7383, 7393, 7407, 7417, 7433, 7446, 7460, 7469, 7480, 7490, 7503, 7513, 7527, 7543, 7552, 7562, 7570, 7579, 7587, 7597, 7606, 7615, 7624, 7633, 7642, 7651, 7661, 7670, 7680, 7690, 7699, 7709, 7719, 7729, 7739, 7748, 7757, 7766, 7775, 7786, 7795, 7804, 7815, 7827, 7836, 7845, 7865, 7878, 7887, 7897, 7906, 7916, 7933, 7942, 7960, 7975, 7984, 7993, 8002, 8023, 8033, 8043, 8052, 8061, 8080, 8173, 8207, 8215, 8223, 8238, 8247, 8250, 8266, 8273, 8279, 8289, 8299, 8308, 8317, 8327, 8343, 8351, 8362, 8371, 8383, 8392, 8400, 8412, 8441, 8450, 8460, 8469, 8477, 8485, 8496, 8504, 8512, 8520, 8528, 8536, 8544, 8552, 8561, 8571, 8584, 8595, 8604, 8612, 8620, 8629, 8643, 8653, 8665, 8677, 8685, 8695, 8704, 8713, 8724, 8735, 8744, 8753, 8773, 8790, 8805, 8814, 8831, 8841, 8850, 8859, 8873, 8882, 8891, 8900, 8913, 8922, 8933, 8942, 8952, 8965, 8976, 8986, 8997, 9015, 9024, 9033, 9042, 9052, 9061, 9077, 9091, 9101, 9110, 9120, 9132, 9143, 9152, 9161, 9170, 9178, 9188, 9199, 9212, 9221, 9230, 9241, 9250, 9261, 9270, 9279, 9294, 9304, 9318, 9327, 9336, 9345, 9354, 9363, 9372, 9381, 9390, 9399, 9409, 9418, 9427, 9438, 9447, 9456, 9465, 9476, 9485, 9494, 9503, 9512, 9540, 9566, 9575, 9584, 9593, 9602, 9611, 9620, 9638, 9654, 9663, 9678, 9687, 9696, 9708, 9723, 9732, 9741, 9750, 9764, 9773, 9782, 9791, 9831, 9840, 9849, 9859, 9875, 9897, 9906, 9915, 9925, 9934, 9946, 9963, 9975, 9984, 9993, 10002, 10019, 10030, 10045, 10058, 10087, 10096, 10105, 10117, 10128, 10140, 10152, 10164, 10173, 10186, 10202, 10212, 10235, 10256, 10263, 10276, 10285, 10295, 10305, 10314, 10323, 10340, 10351, 10368, 10380, 10389, 10399, 10408, 10417, 10438, 10445, 10454, 10468, 10483, 10498, 10514, 10528, 10539, 10554, 10563, 10576, 10585, 10594, 10603, 10612, 10624, 10637, 10648, 10662,

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Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SE48/H: Westgate Hill Street, Tong	1517	1500	1513	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on highways • Impact on health • Flood risk – Zone 1 • Impact on house prices • Environmental impact • Lack of infrastructure • Alternative sites • General comments • General support • Site boundary	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified, alongside SE19/H, SE46/H & SE47/H, as part of H911, in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Green Belt • the site is green belt and its allocation would be undemocratic on the basis that not been one survey, or opinion poll taken in Bradford, which agrees with Bradford Councils views on building on green belt and impact on listed buildings. • Green Belt exceptional circumstances have not been demonstrated, no appreciation of cultural, historical, recreational or environmental aspects.
2. Highways

- No information provided on road impact. New road building is inconsistent with the Council's declaration of a climate emergency in 2019. Concern that road will release further development sites, increase air pollution and traffic.
- Unclear whether the development of the site would be dependent on SEBAR and the impact of the road on communities with regard severance, noise and air quality

3. Health

- Area provides access to green space for walking, running, cycling and horse-riding etc. Its development will impact health.
- Development would increase air pollution and congestion on Tong Street and wider area

4. Flooding

- Development will lead to flooding further down the valley. Flood risk assessment is vital

5. Housing

- Impact on house prices

6. Environment

- Area is biodiverse and home to hundreds of threatened species. No assessment of the impact of development on the environment, especially on ancient woodland at Black Carr and Kit Woods. Building in it would be an ecological disaster.
- Loss of trees, fauna and flora and area for farming

7. Infrastructure

- Lack of infrastructure- schools, doctors, dentists

8. Other sites

- Ample other brownfield sites in the District which should be prioritised

9. General Comments

- No consideration of the effects of the pandemic and Brexit. The 2021 census should inform future planning policy.
- The estate is plagued by anti-social behaviour and the allocation of the site would do little to bring targeted benefits to Holme Wood
- Loss of buffer between cities
- Loss of land will be detrimental to children learning about nature and scouting

Support:

1. General Support

- supported the inclusion of the site and confirmed the land was available and deliverable and referred to further information provided.

Comment:

1. Flooding

- site is situated in Flood Zone 1 (FZ1) and provided guidance on appropriate flooding mitigation measures and surface water discharge rates that would be required.

2. Site boundary

- site boundary could be revised to align the site with the proposed access road which would marginally reduce the site.

3. General comment

- Concerned about potential encroachment and reduction of the strategic green belt and scale of land required with potential impact on infrastructure provision on Leeds. Further justification that all other locations have been exhausted. Would like to see that all potential other options had been exhausted first. Comments reserved on whether proposed road improvements on Tong Street would be sufficient.

Representation IDs: 3667, 4993, 6185, 6199, 6219, 6228, 6237, 6246, 6255, 6264, 6272, 6282, 6293, 6302, 6311, 6319, 6340, 6351, 6362, 6371, 6380, 6389, 6397, 6415, 6439, 6449, 6458, 6469, 6495, 6504, 6513, 6522, 6531, 6542, 6551, 6563, 6572, 6584, 6595, 6606, 6614, 6624, 6633, 6644, 6653, 6662, 6680, 6692, 6717, 6727, 6737, 6750, 6774, 6783, 6792, 6806, 6822, 6846, 6861, 6872, 6882, 6893, 6906, 6925, 6934, 6946, 6960, 6975, 6985, 6987, 6996, 7006, 7016, 7027, 7041, 7056, 7065, 7074, 7097, 7108, 7117, 7126, 7157, 7174, 7189, 7237, 7258, 7270, 7286, 7297, 7306, 7315, 7327, 7336, 7344, 7353, 7363, 7375, 7384, 7394, 7408, 7418, 7434, 7447, 7461, 7470, 7481, 7491, 7504, 7515, 7528, 7544, 7553, 7563, 7571, 7580, 7588, 7598, 7607, 7616, 7625, 7634, 7643, 7652, 7662, 7671, 7681, 7691, 7700, 7710, 7720, 7730, 7740, 7749, 7758, 7767, 7776, 7787, 7796, 7805, 7816, 7828, 7837, 7846, 7866, 7879, 7888, 7898, 7907, 7917, 7934, 7943, 7961, 7976, 7985, 7994, 8003, 8024, 8034, 8044, 8053, 8062, 8081, 8208, 8216, 8224, 8239, 8248, 8258, 8267, 8276, 8280, 8290, 8300, 8309, 8318, 8328, 8352, 8363, 8372, 8384, 8393, 8401, 8413, 8442, 8451, 8461, 8470, 8478, 8486, 8497, 8505, 8513, 8521, 8529, 8537, 8545, 8553, 8562, 8572, 8585, 8596, 8605, 8613, 8621, 8630, 8644, 8654, 8666, 8678, 8686, 8696, 8705, 8714, 8725, 8736, 8745, 8754, 8774, 8791, 8806, 8815, 8832, 8842, 8851, 8860, 8874, 8883, 8892, 8901, 8914, 8923, 8934, 8943, 8953, 8966, 8977, 8987, 8998, 9016, 9025, 9034, 9043, 9053, 9062, 9078, 9092, 9102, 9111, 9121, 9133, 9144, 9153, 9162, 9171, 9179, 9189, 9200, 9213, 9222, 9231, 9242, 9251, 9262, 9271, 9280, 9295, 9305, 9319, 9328, 9337, 9346, 9355, 9364, 9373, 9382, 9391, 9400, 9410, 9419, 9428, 9439, 9448, 9457, 9466, 9477, 9486, 9495, 9504, 9513, 9541, 9567, 9576, 9585, 9594, 9603, 9612, 9621, 9639, 9655, 9664, 9679, 9688, 9697, 9709, 9724, 9733, 9742, 9751, 9765, 9774, 9783, 9792, 9832, 9841, 9850, 9860, 9876, 9898, 9907, 9916, 9926, 9935, 9947, 9964, 9976, 9985, 9994, 10003, 10020, 10031, 10049, 10059, 10088, 10097, 10106, 10118, 10129, 10141, 10153, 10165, 10174, 10187, 10203, 10213, 10236, 10257, 10264, 10277, 10286, 10296, 10306, 10315, 10324, 10341, 10352, 10369, 10381, 10390, 10400, 10409, 10418, 10446, 10455, 10458, 10469, 10484, 10499, 10515, 10529, 10540, 10555, 10564, 10577, 10586, 10595, 10604, 10613, 10625, 10638, 10649, 10663, 10672, 10687, 10699, 10712, 10721, 10732, 10743, 10752, 10776, 10786, 10801, 10810, 10820, 10823, 10834, 10845, 10855, 10867, 10878, 10887, 10900, 10909, 10922, 10992, 11011, 11024, 11043, 11051, 11082, 11095, 11104, 11114, 11127, 11136, 11145, 11154, 11163, 11172, 11181, 11190, 11199, 11208, 11214, 11226, 11235, 11244, 11275, 11293, 11305, 11317, 11327, 11337, 11346, 11359, 11429, 11446, 11450, 11459, 11477, 11490, 11517, 11528, 11537, 11565, 11585, 11603, 11617, 11636, 11647, 11663, 11674, 11685, 11700, 11713, 11722, 11728, 11740, 11761,

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72.2 In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 84 within the consultation document.

Summary of Consultation

72.3 A total of **11** representations were received in relation to Consultation Question 84 from **8** respondents. Respondents included Highways England, local residents, and a house builder. **Table 2.72.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Error! Reference source not found.**

Table 2.72.5: Consultation Question 84: Bradford South East Preferred Allocations - Overview of Representations Received

Consultation Question	Number of Representations	Number of Respondents	Object	Support	Comment
Q84	31	25	24	0	7

Table 2.72.6: Consultation Question 84: Bradford South East Preferred Allocations - Summary of Representations Received

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Amendments to site • Objections to rejected site • Alternative sites • Heritage impacts • Impact on highways • Impact on infrastructure • Local Area and Strategy Plan • Environment	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

• General comments	

Summary of Representations
Objections
1. Development of Green Belt land: • Green Belt should stop urban expansion and to stop Bradford becoming part of Leeds. • Over dependence on greenbelt / greenfield sites where as some brown field sites are being overlooked. • Lack of greenbelt to enjoy locally except Tong Valley.
2. Suggested amendment to proposed site: • Opportunities to soften the built edge through landscaping / screening and integration of green infrastructure within the scheme design and also the possibility of improving greenbelt access and linkages.
3. Objections to rejected sites: • Objection to the failure to allocate SE/098 - Wyke Mills, Huddersfield Road, Wyke - all nearby land recently developed has been for residential purposes. • Objection to the omission of land at High Fernley Road, Wyke. • Objection to the omission of land at Raikes Lane, Holme Wood. • Objection to failure to allocate SHLAA site SE/110 - Land at Huddersfield Rd, Wyke • Object to the rejection of site SE/126
4. Additional/Alternative site: • Ample other brownfield sites in the District which should be prioritised. • Allocation of Site SE/077 and the potential development land at Summer Hall Ing, Delf Hill for housing. • Sites D and E - additional land as a possible housing allocation, adjoining / to the west and north of SE/077 • Proposed alternative site - Odsall Garden Suburb • Land to the south of Shetcliffe Lane should be a housing allocation

Summary of Representations

- Additional land should be allocated for employment development in the Bradford South East area
- Disappointed to see that the full extent of the Holme Wood Extension has not been allocated for housing

5. Heritage:

- The new housing proposals directly effect a Grade II house and land.

6. Impact on Infrastructure

- New developments will cause congestion and more traffic
- The local schools/GP surgeries don't have space for more people.

Comments

1. Impact on the highway network:

- Development in Bradford North West would not on its own have a severe impact on the Strategic Road Network.
- It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
- A high number of sites have the potential to impact upon the capacity, safety and operation of the SRN.

2. Local Area and Strategy Plan

- BDLP does not show a line or even alternative lines for the SEBAR. The fifth (unlabelled) plan which appears within the Holme Wood local area strategy at paragraph 5.3.45 appears to place it in the middle of Tong Valley approximately at New Lane.

3. Additional sites

- Additional allocations are necessary to provide choice and ensure suitable deliverable sites are provided to meet local need across the South East area.

4. Environment

- There is a Local Wildlife Site (LWS33) adjacent to the Kirklees Council and Bradford Council boundary which is relatively close to proposals in the emerging Bradford Local Plan.

5. General comments

- Future iterations of the Local Plan should combine the residential element of the urban extension as a single allocation.

Summary of Representations
• Should the sites be allocated, site requirements should ensure that these sites are brought forward in a comprehensive, master planned manner. To achieve this it may be necessary to combine the sites into a single allocation.

Representation IDs: 98, 497, 3651, 3655, 3864, 3865, 4204, 4910, 5042, 5075, 5798, 7532, 11281, 12315, 13079, 13584, 13807, 15431, 17002, 17129, 17455, 18086, 18406, 18566, 28132, 28174, 29645, 29666, 29960, 29961, 30212

2.73 BRADFORD SOUTH WEST

Introduction

The Local Plan settlement hierarchy identifies Bradford South West as one of four quadrant areas within the wider Regional City of Bradford. It includes the wards of Great Horton, Royds and large parts of Wibsey, Little Horton, Clayton and Fairweather Green as well as parts of Queensbury and City Ward.

It is considered to be one of the most sustainable locations with access to the wider City and beyond to Leeds, Halifax, Huddersfield. As such it will help make a significant contribution of the meeting the District's housing needs, employment and providing supporting community facilities. Based on this it is proposed that the settlement has a housing target of 3,175 dwellings and accommodates 3.77ha of employment land. A total of 45 site allocations (43 residential and 2 employment) were proposed to deliver these development requirements.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Bradford South West's characteristics and for the purpose of supporting community/neighbourhood approach to the future development strategy, sets out a series of Local Area Strategies for different areas:

- Royds and Wibsey
- Great Horton and Little Horton
- Clayton and Clayton Heights

These were listed as questions 85 to 87 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **33** representations were received in relation to the Bradford South West spatial portrait and Local Area Strategy (Questions 85 – 87) from **32** respondents. Respondents included Highways England, Historic England, National Grid, local residents, landowners, a house builder and local Ward councillors. **Error! Reference source not found.** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Error! Reference source not found.**.

Table 74.1: Consultation Questions 85 - 87: Bradford South West Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
Q85	Royds and Wibsey	11	11	9	1	1
Q86	Great Horton and Little Horton	3	3	1	1	1
Q87	Clayton and Clayton Heights	19	18	13	2	4
	Totals	**33**	**32**	**23**	**4**	**6**

Table 74.2: Bradford South West Portrait & Local Area Strategy - Summary of Representations Received

Consultation Question 85: Royds and Wibsey

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
Q85	Royds and Wibsey	11	11	9	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on natural environment • Impact on local infrastructure/services • Impact on the local highway network • Amount of development • Viability • Housing density • Green Belt	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BSW1: Bradford South West, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Land issues and flood risk • Loss of open spaces • Specific site objections • Support for Blue/Green Infrastructure • Impact on highways network	

Summary of Representations
Objections:
1. Impact on natural environment: • The proposed developments of circa 300 homes will have a detrimental effect on the environmentally sensitive green fields, Judy Woods and impact in valued open space which would be a detriment to the health and wellbeing of local residents as well as being damaging to wildlife and their habitats.
2. Impact on local infrastructure/services: • The Royds ward is already highly urbanised with overstretched infrastructure. The cumulative impact of the housing estate proposed will worsen an already inequitable position. • Local infrastructure is not capable to sustaining these developments. • Local schools struggle with places as they are at capacity/full.
3. Impact on the local highway network: • The local area has issues with insufficient roads and traffic; new developments would make the situation worse. References to Meadway and Fenwick Drive. • Impact on air pollution.
4. Amount of development: • Development proposals are excessive given its location.
5. Viability: • Concerns raised regarding the viability of housing schemes
6. Housing density:

- Concerns raised regarding housing densities.

7. Green Belt:

- Concerns raised regarding the loss of green fields and green belt land to the edge of the urban area.

8. Land issues and flood risk:

- Land is a former mining area with concerns raised about poorly documented workings which could result in subsidence.
- Extensive high voltage electricity pylons on the sites
- Issues of flooding.

9. Loss of open spaces:

- Concerns raised about the loss of open spaces and recreational open spaces.
- Loss of land gifted in trust for open space.

10. Specific site objections:

- Objection to rejected site SW/034B which is adjacent to SW14/H. The site is contiguous to the built up area and would form acceptable and sustainable development.

Support:

1. Blue / Green Infrastructure:

- Support for the increase in blue-green infrastructure, greenspace and trees and connectivity for people and wildlife.
- Safe walking and cycling routes are key to changing behaviour and improving health and wellbeing.

Comments:

1. Impact on highway network:

- Development within Bradford South West would not on its own have a severe impact on the Strategic Road Network (SRN).
- The wider cumulative impact within the Bradford South West area and the rest of the development aspirations within the plan could severely impact the SRN.
- It was noted that any cumulative impacts would need to be identified as part of the transport evidence being prepared and considered by Highways England.

Representation IDs: 396, 728, 735, 1060, 1493, 3748, 3835, 3856, 5572, 5752, 15432, 17154

Consultation Question 86 – Great Horton and Little Horton

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
Q86	Great Horton and Little Horton	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Support Blue/Green Infrastructure • Impact on highway network	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to new Policy BSW1: Bradford South West which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Development on Green Belt land: • The use of brownfield land should be maximised first, of which there were numerous examples across the District. • Green belt sites should be removed from the plan.
Support:
1. Blue / Green Infrastructure: • Support for the increase in blue-green infrastructure, greenspace and trees and connectivity for people and wildlife. • Safe walking and cycling routes are key to changing behaviour and improving health and wellbeing.
Comments:
2. Impact on highway network: • Development within Bradford South West would not on its own have a severe impact on the Strategic Road Network (SRN).

- The wider cumulative impact within the Bradford South West area and the rest of the development aspirations within the plan could severely impact the SRN.
- It was noted that any cumulative impacts would need to be identified as part of the transport evidence being prepared and considered by Highways England.

Representation IDs: 499, 5573, 15433

Consultation Question 87 – Clayton and Clayton Heights

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
Q87	Clayton and Clayton Heights	19	18	13	2	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Local Area Strategy • Development on Green Belt land • Impact on greenspaces • Impact on biodiversity • Impact on infrastructure • Impact on the local highway network • Flood risk • Impact on local amenity • Impact on health and well-being • Planning Compliance • Flood risk • Provision of local footpaths	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to new Policy BSW1: Bradford South West which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Local Area Strategy • Objections to levels of housing distribution proposed around Baldwin Lane and wider Clayton. • Disproportionate distribution of housing planned for a relatively small area around Baldwin Lane in Clayton. • Proposals not in line with strategy to reduce volume and impact of traffic, reducing air pollution and retain open spaces.

• Clayton & Clayton Heights have already borne significant development over the last few years.
2. Development on Green Belt land: • Objections to use of green belt land / greenspaces for development. • Bradford has a plentiful supply of brownfield sites that have not been developed. • Disproportionate distribution of housing planned for a relatively small area around Baldwin Lane in Clayton.
3. Impact on greenspaces: • Mental health benefits of green spaces. • There is a need for green spaces for children, e.g. Westminster Avenue has no spaces for children to play and they should be incorporated into the plan.
4. Impact on biodiversity: • A range of biodiversity in the area which will be impacted from development.
5. Impact on infrastructure: • Local infrastructure and it not being capable to sustaining these developments (lack of school places, GPs and dentists). • Children living on the edge of the village are required to travel long distances to school and outside of the local community**.**
6. Impact on the local highway network: • The local area has issues with unsuitable roads and congestion; new developments would make the situation worse. References Clayton. • Impact on air pollution. • Transport options should not include cycle options as no one cycles to work in Clayton.
7. Flood risk: • The utilities (drains) are not sufficient to sustain the current housing. • Development would increase risk of flooding. Low Lane, Spring Valley View have experienced flooding. • Topography makes surface water disposal in controlled manner challenging as existing sewer system • Climate change and additional housing will increase flood risks.
8. Impact on local amenity: • Development would damage the area's character, wildlife, biodiversity and environment.

- Impact on the views and vistas within the Clayton Conservation Area.

9. Impact on health and wellbeing:

- Proposals would have a negative effect on the quality of life and detriment effect on physical and mental wellbeing.

10. Planning Compliance:

- Failure of the current builders complying with requirements set out in the planning documents.

Support:

1. Local Area Strategy

- Support for the local area strategy which identified the area as a key location for housing growth with circa 1045 homes to be allocated and delivered alongside planning permissions.

2. Development on Green Belt land:

- Support for the aspirations for new housing development in the green belt delivering strong natural landscaping and public open space which contribute to place making.

3. Blue / Green Infrastructure:

- Support for the increase in blue-green infrastructure, greenspace and trees and connectivity for people and wildlife.
- Safe walking and cycling routes are key to changing behaviour and improving health and wellbeing.

Comments:

1. Impact on local infrastructure/services:

- The local infrastructure is already overwhelmed (pressure on local schools, dentists, doctors); further housing will exacerbate the problem.

2. Flood risk:

- There area has existing issues with the drainage around Spring Valley site, and major concerns to the neighbouring land / Low Lane for flooding and drainage. There are similar concerns at Hole Bottom Beck to Low Lane.

3. Provision of local footpaths:

- Footpaths should be sensitively incorporated into development to ensure that they are accessible and safe spaces. Clayton has an extensive network of footpaths which cut through proposed housing sites in the plan. Footpaths should be formally identified, registered, protected and improved. Footpaths have had little regard in the new developments.

4. Impact on highway network:

- Development within Bradford South West would not on its own have a severe impact on the Strategic Road Network (SRN).
- The wider cumulative impact within the Bradford South West area and the rest of the development aspirations within the plan could severely impact the SRN.
- It was noted that any cumulative impacts would need to be identified as part of the transport evidence being prepared and considered by Highways England.

Representation IDs: 157, 423, 500, 775, 3056 ,3413, 3955, 4287, 4578 ,4693, 5359, 5574, 6471, 15381, 15434, 18576, 27503, 27504, 29718

Sites

As highlighted above, **45** sites were put forward in the Preferred Options document to meet the proposed development requirements for Bradford South West (all for residential). Under consultation question 88 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **236** representations were received in relation to policies SW1/H to SW47/H from **230** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents, landowners, organisations and Parish/Town Council. **Table 74.** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table Error**! No text of specified style in document.**.7**.

Table 74.6: Bradford South West Proposed Sites (SW1/H to SW47/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW1/H - Back Fold, Clayton	8	8	6	1	1
SW2/H - Westminster Avenue	7	7	3	1	3
SW3/H - Ferndale, Clayton	5	5	3	1	1
SW4/H - Brook Lane, Clayton	6	6	3	1	2
SW5/H - Langberries, Clayton Heights	15	13	12	2	1
SW6/H - Highgate Grove, Clayton Heights	9	8	6	2	1
SW7/H - Theakston Mead/Thirsk Grove	2	2	1	0	1
SW8/H - Frensham Drive	1	1	0	0	1
SW9/H - South of Highgate Road	4	4	2	0	2

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW10/H - Stocks Lane, Old Dolphin, Clayton Heights	5	5	3	1	1
SW11/H - Dirkhill Road	1	1	0	0	1
SW12/H - Horton Park Avenue	2	2	1	0	1
SW13/H - Cannon Mills, Cannon Mill Lane / Union Road, Great Horton	2	2	1	0	1
SW14/H - Fenwick Drive, Woodside	32	32	23	2	7
SW15/H - Thornton Road/Munby Street	1	1	0	0	1
SW16/H - Cottam Avenue	2	2	0	1	1
SW17/H - Briggella Mills, Little Horton Lane	3	3	1	1	1
SW18/H - Fall Top Farm, Brook Lane, Clayton	9	9	7	1	1
SW19/H - Junction with Park Road, Manchester Road, Little Horton	2	2	0	1	1
SW20/H - Quaker Lane, Southfield Lane	1	1	0	0	1
SW21/H - Thornton Road, Leaventhorpe	4	3	2	0	2
SW22/H - Baldwin Lane, Clayton	8	8	5	1	2
SW23/H - Northside Road, Girlington	2	2	0	1	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW24/H - Northside Road, Girlington	1	1	0	0	1
SW25/H - Lingdale Road, Woodside	10	10	7	1	2
SW26/H - Abb Scott Lane, Low Moor	11	11	10	0	1
SW27/H - Paradise Fold, Great Horton	2	2	1	0	1
SW28/H - Abb Scott Lane, Low Moor	5	5	2	1	2
SW29/H - Harris Court Mill, Great Horton Road, Great Horton	2	2	1	0	1
SW30/H - Brafferton Arbor, Buttershaw	3	3	1	0	2
SW31/H - Former Odsal Clinic 55 Odsal Road	1	1	0	0	1
SW32/H - Church Street, Buttershaw	5	5	3	0	2
SW33/H - Land off Buckingham Crescent, Clayton	12	11	5	5	2
SW34/H - Meadway, Wibsey	12	12	8	1	3
SW35/H - All Saints Road	1	1	0	0	1
SW36/HC - Highgate Road, Clayton Heights	6	6	2	2	2
SW37/H - Cousen Road	3	3	2	0	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW38/HC - Dovedale Road, Bankfoot	1	1	0	0	1
SW39/H - Bowman Road, Wibsey	20	20	19	0	1
SW40/H - Northside Road	1	1	0	0	1
SW41/HC - Blamires Street	1	1	0	0	1
SW42/HC - Former Pub, Reevy Road, The Crescent, Buttershaw	2	2	0	1	1
SW43/H - Bell House, Southfield Lane	2	2	1	0	1
SW47/E - Between Clayton Lane and Lister Arms, Manchester Road	2	2	1	0	1
SW48/E - Ingleby Road	2	1	0	0	2
Totals	**236**	**230**	**142**	**28**	**66**

Table Error! No text of specified style in document.**.7: Bradford South West Proposed Sites (SW1/H to SW47/H) - Summary of Representations Received**

SW1/H - Back Fold, Clayton

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW1/H - Back Fold, Clayton	8	8	6	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Site access • Impact on highway network • Impact on local services • Flood risk/drainage • Impact on local sewers • Impact on wildlife • Impact on historic environment • Impact on views/vistas • Timescale for delivery	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1248 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Site allocation: • Potential impact of noise and pollution within the quiet valley.
2. Site access:

	• Access on Deep Lane was not considered acceptable. • The road is too narrow and unable to accommodate further traffic. • Development would increase leads to further issues with car parking.
3.	**Impact on the highway network:** • Highways safety is a concern as the area is used as a short cut for commuters. • Bus routes were described as 'atrocious' which will lead to more car users. • Traffic volume area an issue. • Traffic at the roundabout has increased since new housing built.
4.	**Impact on local services** • The area is considered to be 'too built up already' and respondents noted the current pressures already faced by struggling GP surgeries, dentists and the availability of local school places. It was noted that the village is in need of more food shops and recreation to support local families.
5.	**Flood risk/drainage:** • Concerns raised regarding surface water drainage, blocked drains and the potential impacts of flooding and pollution to adjacent land as a result of any development. • Concerns raised regarding the removal of natural soakaway which increases risk for Clayton Beck.
6.	**Impact on local sewers:** • Further development will result in additional loading placed on the existed public sewer system which has been demonstrated by the need for additional attenuation facilities being put in place to accommodate recent developments.
7.	**Impact on wildlife:** • No regard for the local established agricultural activities within the area • No regard for local wildlife, including bats.
8.	**Impact on the historic environment:** • Historic England noted that the HIA has undervalued the contribution which this site makes to the rural setting and significance of the Conservation Area. • The buildings fronting Town End appear to follow the trace of medieval burgage plots and it looks as though the fields to the rear and their stone boundaries formed the limit of the medieval burgage. As this is the only remaining area of the historic village where this can

still be appreciated, they make a positive contribution to the character and significance of the Conservation Area. This also remains the last vestige of the rural setting of the historic settlement that remains free of development.

- The development of this site, as allocated, is likely to result in considerable harm to the setting and appreciation of the Conservation Area.
- Suggestions:

  a) Delete this allocation entirely. or

  b) Delete the northern part of this site (illustrated as causing harm to heritage assets in the Heritage Impact Assessment); and

  c) Amend the first Development Consideration in the site proforma for this site to read: “A low density scheme utilising appropriate and sympathetic scale, design and materials is required which minimises impact on landscape character and heritage assets.”

9. Impact on views/vistas:

- Development would have an impact on the views and vistas in this area.

10. Impact on agricultural land:

- No regard for established agricultural land

Support:

1. Site allocation:

- Site lies within a sustainable location, close to existing and facilities.
- Development will look to retain the identified key open space in order to preserve the rural character and setting of the conservation area.
- There are no environmental constraints associated with the site that cannot be dealt with via appropriate design.
- It is considered a logical extension to the urban edge of Clayton.

2. Timescale for delivery:

- Request that if this site is allocated, the timescale for development should be amended to 0-5 years.

Comments:

1. Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 371, 397, 795, 4232, 4414, 28889, 29196, 30113

SW2/H: Westminster Avenue

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW2/H - Westminster Avenue	7	7	3	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Use of Previously Developed Land • Site access • Planning application on site • Impact on views and vistas • Impact on local highways network • Flood risk/drainage • Impact on local sewers • Impact on wildlife • Loss of greenspace • Impact on local services • Impact on health and well-being • Impact on area character • Site availability • Planning decision	Since the consultation on the Regulation 18 Local Plan was undertaken, this site has now been developed out and is in residential use and is therefore no longer allocated in the Plan.

Summary of Representations
Objections:
1. Use of Previously Developed Land: • It was argued that brownfield sites within Bradford should be utilised much more.

2. Site access: • Site access via Westminster Drive was not considered to be practical due to the width of the road and the expected increase in domestic and business traffic.
3. Planning application on site: • It was noted that a planning application submitted for this site received a large amount of opposition through the process.
4. Impact on views/vistas: • Development of this site will impact the skyline down the Clayton and Queensbury valley.
5. Impact on local highway network: • Concerns regarding the increased traffic congestion, access and highway safety issues. • Clayton roundabout cannot cope with the increasing levels of traffic.
6. Flood risk/drainage: • Concerns raised regarding surface water drainage, blocked drains and the potential impacts of flooding and pollution to adjacent land as a result of any development.
7. Impact on local sewers: • Further development will result in additional loading placed on the existed public sewer system which has been demonstrated by the need for additional attenuation facilities being put in place to accommodate recent developments.
8. Impact on wildlife: • There was concern from two respondents about the impact on local wildlife (deer, badgers and hawks) and the environment
9. Loss of greenspace: • Concerns about the loss of greenspace. • Proposal will have an impact on people's health and wellbeing as the area is used by locals for exercise and recreation.
10. Impact on local services: • Concerns for the lack of and additional pressures placed on local services such as doctors, health centres and schools.
11. Impact on health and wellbeing: • Area has been an asset in recent times as is used for exercise.
12. Impact on the areas character:

- Will result in further damage to the area's character.

Support:

1. **Site availability:**
   - Support for site allocation.
   - Confirmation that the site is available.

Comments:

1. **Planning decision:**
   - It was noted that the site is subject to planning submission for 70 dwellings.
   - Concern is raised regarding any further development from a single point of access or emergency access which is not deemed to be acceptable and contrary to design guidance. Even if the issues did not exist, there is no suitable connection to the boundary of this site that would facilitate access to any wider development sites bounding this site, as the internal roads would not meet the required standards of a larger development for either a Type 1 or 2 street, with any cul-de-sac also being significantly longer than that permitted.
2. **Flooding/drainage:**
   - The site located in Flood Zone 1 (FZ1).
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates.

Representation IDs: 3794, 4234, 5298, 7133, 21750, 21757, 28890

SW3/H: Ferndale, Clayton

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW3/H - Ferndale, Clayton	5	5	3	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site access • Impact on local highways network • Flood risk/drainage • Impact on local sewers • Impact on wildlife and environment • Loss of greenspace • Impact on local services/infrastructure • Impact on local wildlife and environment • Impact on area character • Site availability	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1266 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Site access:**
   - Access to the site off Brook Lane was highlighted as a key challenge.
   - Respondents highlighted the longstanding concerns regarding the suitability of Brook Lane to deliver additional vehicles dating back to the 2004 RUDP Inspectors report. A highways technical appendix and assessment has been provided.
   - Respondents have refuted the Council's suggested proposal for the creation of a new road to serve sites SW3/H, SW4/H and SW18/H by confirming that the landowner does not give consent for this and therefore is not deliverable.

2. Flooding/drainage: • Concerns raised about the potential impacts of flooding and pollution to adjacent land.
3. Impact on local sewers: • Further development will result in additional loading placed on the existed public sewer system which has been demonstrated by the need for additional attenuation facilities being put in place to accommodate recent developments.
4. Impact on local services / infrastructure: • Development would have an impact on local infrastructure, including schools, health centre and other key infrastructure.
5. Impact on local highway: • Concerns about the impact on local roads (congestion, access and highway safety).
6. Impact on local wildlife and environment: • Concern was raised about the impact to the areas character, wildlife and environment.
7. Impact on the areas character: • Will result in further damage to the area's character.
Support:
1. Site availability: • Support for site allocation • Confirmation that the site is available.
Comments:
1. Flood risk/drainage: • Site located within Flood Zone 1 (FZ1). • Guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required.

Representation IDs: 4236, 7134, 21752, 21758, 28891

SW4/H: Brook Lane, Clayton

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW4/H - Brook Lane, Clayton	6	6	3	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Site access • Impact on local highways network • Flood risk/drainage • Impact on local sewers • Impact on wildlife and environment • Impact on local services/infrastructure • Impact on local wildlife and environment • Impact on area character • Site identification • Proximity to SPA/SAC	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1276 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site allocation: • Several objections to the site allocation.
2. Site access: • Access to the site off Brook Lane was highlighted as a key challenge.

- Respondents highlighted the longstanding concerns regarding the suitability of Brook Lane to deliver additional vehicles dating back to the 2004 RUDP Inspectors report. A highways technical appendix and assessment has been provided.
- Respondents have refuted the Council's suggested proposal for the creation of a new road to serve sites SW3/H, SW4/H and SW18/H by confirming that the landowner does not give consent for this and therefore is not deliverable.

3. Flooding/drainage:

- Concerns raised about the potential impacts of flooding and pollution to adjacent land.

4. Impact on local sewers:

- Further development will result in additional loading placed on the existed public sewer system which has been demonstrated by the need for additional attenuation facilities being put in place to accommodate recent developments.

5. Impact on local services / infrastructure:

- Development would have an impact on local infrastructure, including schools, health centre and other key infrastructure.

6. Impact on local highway:

- Concerns about the impact on local roads (congestion, access and highway safety).

7. Impact on local wildlife and environment:

- Concern was raised about the impact to the areas character, wildlife and environment

8. Impact on the areas character:

- Will result in further damage to the area's character.

Support:

1. Site identification:

- Support for site allocation.
- Confirmation that the site is available.

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).

• Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Proximity to SPA: • Confirmation that the site lies in proximity to the South Pennine Moors (Phase 2) SPA and has the potential to lead to the loss of functionally linked land for SPA birds. Advice and guidance was provided for survey and mitigation requirements to be included in the plan.

Representation IDs: 4243, 7135, 19897, 21754, 21759, 28892

SW5/H: Langberries, Clayton Heights

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW5/H - Langberries, Clayton Heights	15	13	12	2	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Extent of site allocation • Housing density • Impact on Green Belt • Impact on agriculture • Flooding/drainage • Impact on local sewers • Impact on local services/infrastructure • Impact on local highway network • Impact on wildlife and environment • Impact on historic assets • Impact on local amenity • Impact on health and well-being • Site identification • Green Belt and exceptional circumstances • Deliverability of the site	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1548 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Extent of the Site allocation: • Objection related to the non-identification of the remaining extent of the site (SHLAA ref: SW/010A). The green belt site specific assessment concludes that this extent of the site would have moderate impact on the green belt – with appropriate design and landscaping, the exceptional circumstances of the need to meet the districts housing requirement justify the release of the site.
2. Housing density: • Sites that are not suitable for policy-compliant densities should not be allocated, irrespective of whether they are brownfield, greenfield or green belt.
3. Impact on Green Belt: • It was argued that green belt land should be protected to prevent urban sprawl – it is not considered a sustainable form of development and there is a need to protect the village of Clayton. • Green spaces are needed for health and wellbeing and habitats for wildlife.
4. Impact on agriculture: • Development would have an impact on local farmland.
5. Flooding/drainage: • Concerns raised about the potential impacts of flooding and pollution to adjacent land.
6. Impact on local sewers: • Further development will result in additional loading placed on the existed public sewer system which has been demonstrated by the need for additional attenuation facilities being put in place to accommodate recent developments.
7. Impact on local services / infrastructure: • Development would have an impact on local infrastructure, including schools, health centre and other key infrastructure.
8. Impact on local highway: • Development would increase traffic, noise and air pollution, particularly on Pasture Lane with parked cars lining the street. • Traffic from City Centre to Clayton is heavily congested at peaks times.

9. Impact on local wildlife and environment:

- Concern was raised about the impact to the areas character, wildlife and environment

10. Impact on historic assets:

- Historic England advised that before allocating this site for development:
  (1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.
  (2) If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.
  (3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).

11. Impact on local amenity:

- Land used by the community for walks and recreation.

12. Impact on health and wellbeing:

- Greenspaces are needed for mental and physical wellbeing.

Support:

1. Site identification:

- Support for site allocation, however there is a separate objection to the non-identification of the remaining extent of site SW5/H.
- The SA indicated the site is well located to provide residents with good access to jobs, services, transport and health facilities.

2. Green Belt and exceptional circumstances:

- The green belt site specific assessment concludes that the site would have a moderate impact on the green belt. It is considered that with appropriate design and landscaping, that the exceptional circumstances of the need to meet the districts housing requirement justify the release of the site.

3. Deliverability of the site:

- It is confirmed that the site is deliverable in the short term and therefore it is put forward that the delivery timescales should be amended to 0-5 years.

Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 190, 194 ,205, 228, 229, 230 ,245, 4252, 5490, 21674, 21675, 28893, 29197, 30114, 30115

SW6/H: Highgate Grove, Clayton Heights

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW6/H - Highgate Grove, Clayton Heights	9	8	6	2	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Impact on Green Belt • Impact on agriculture • Flooding/drainage • Impact on local sewers • Impact on local services/infrastructure • Impact on local highway network • Impact on wildlife and environment • Impact on historic assets • Impact on local amenity • Housing density • Site allocation • Proximity to heritage asset	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as part of the wider site H1144 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site allocation: • Several objections to proposed site allocation.

- Objection related to the non-identification of the remaining extent of the site.
- Sites that are not suitable for policy-compliant densities should not be allocated, irrespective of whether they are brownfield, greenfield or green belt.
- Objection to the non-identification of the remaining extent of the site (SHLAA ref: SW/10B). The green belt site specific assessment concludes that this extent of the site would have moderate impact on the green belt. There are no environmental constraints within the site that cannot be dealt with via appropriate design. The allocation of the wider site would form a logical extension to the urban edge.

2. Impact on Green Belt:

- It was noted that the site is green belt and development would have a significant impact on the area.

3. Flooding/drainage:

- Concerns raised about the potential impacts of flooding and pollution to adjacent land.

4. Impact on local sewers:

- Further development will result in additional loading placed on the existed public sewer system which has been demonstrated by the need for additional attenuation facilities being put in place to accommodate recent developments.

5. Impact on local services / infrastructure:

- Development would have an impact on local infrastructure, including schools, health centre and other key infrastructure.

6. Impact on local highway:

- Development would lead to an increase in traffic, congestion (by parked cars), access and highways safety issues.
- The junction at Highgate Road and Linfield Terrace is considered dangerous as it is almost a blind corner.
- Concerns were raised relating to the increased volume of traffic and temporary construction traffic from any development.

7. Impact on local wildlife and environment:

- Concern was raised about the impact to the areas character, wildlife and environment

8. Impact on local amenity:

- Land used by the community for walks and recreation.

9. Housing density:

- Sites that are not suitable for policy-compliant densities should not be allocated, irrespective of whether they are brownfield, greenfield or green belt.

Support:
1. Site allocation: • Support for the identification of this site as a preferred housing site, however there is a separate objection to the non-identification of the remaining extent of SW6/H. • The SA indicated the site is well located to provide residents with good access to jobs, services, transport and health facilities. • No known viability or environmental constraints • Site is deliverable.
2. Proximity to heritage asset: • Historic England stated that a large group of Grade II Listed Buildings associated with the former North Bierley Union Workhouse, then subsequently Thornton View Hospital are located 200 metres to the north-east of the site. A reference of the inclusion to the proximity of these designated heritage assets as a Constraint in the sites pro forma is welcomed, and that the Development Considerations highlight that a sensitive design and layout will be required to avoid or minimise the impact of development on them. This will alert potential developers of the need to take account of those elements which contribute to their significance and ensure that they are not harmed by development proposals.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 4259, 4638, 5672, 8166, 11248 ,21700, 21701, 28894, 29198

SW7/H: Theakston Mead/Thirsk Grove

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW7/H - Theakston Mead/Thirsk Grove	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on historic assets • Flood risk /drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1281 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. Impact on historic assets:

- Historic England advised that before allocating this site for development:
  - (1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.
  - (2) If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.
  - (3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).

Support:
There were no comments in support for this allocation.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28895, 29199

SW8/H: Frensham Drive

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW8/H - Frensham Drive	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk /drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1282 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No objections received to this site allocation.
Support:
No comments in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28896

SW9/H: South of Highgate Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW9/H - South of Highgate Road	4	4	2	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt Land • Site access • Flood risk/drainage • Proximity to major infrastructure	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1283 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Development on Green Belt land:**
   - Concerns that the immediate area is a local beauty attraction and these houses stand alone in the middle of that.
2. **Site access:**
   - Access to this site is dependent on the agreement of the developer at an adjoining site.
   - There are no guarantees that the adjoining development will be delivered nor that access will be granted to this site via that development.

Support:

No comments in support of the site allocation.

Comment:

1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Proximity to major infrastructure: • The site is crossed or is in close proximity to National Grid assets. Plans and guidance on developments near National Grid assets is provided.

Representation IDs: 4639, 5674, 27712, 28897

SW10/H: Stocks Lane, Old Dolphin, Clayton Heights

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW10/H - Stocks Lane, Old Dolphin, Clayton Heights	5	5	3	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Development on Green Belt • Site access • Proximity to heritage asset • Proximity to local primary school • Heritage Impact Assessment • Flood risk /drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1249 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site allocation • Objection to the site allocation. • It was argued that sites that are not suitable for policy-compliant densities should not be allocated, irrespective of whether they are brownfield, greenfield or green belt.
2. Development on Green Belt: • Objection to the use of Green Belt for development.
3. Site access: • Stocks Lane is a very narrow road which is noted in the document.

- It also provides vehicle and pedestrian access to Stocks Lane Primary School which would make increasing traffic a significant safety concern given its size.
- Traffic calming measures would help with vehicle access but would not solve issues for pedestrians as the road is not wide enough for a suitable footpath.

4. Proximity to heritage asset:

- Site is within close proximity to a large number of listed buildings.

5. Proximity to local primary school:

- Site is within close proximity Stocks Lane Primary School; increase in traffic would be a safety concern.

Support:

1. Heritage Impact Assessment:

- Historic England commented that the site is located south-east of a group of Grade II listed buildings concentrated around Highgate Road and New House Lane. The Heritage Impact Assessment indicated that, due to intervening buildings, the development of this site would result in no change to the character and setting any designated heritage assets.
- Historic England would concur with this analysis and with the assessment of the degree of harm that the development of this site would be likely to cause.
- Historic England would also endorse the mitigation measures which have been put forward in the Heritage Impact Assessment.

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 4641, 5678, 8167, 28898, 29200

SW11/H: Dirkhill Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW11/H - Dirkhill Road	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk /drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1250) is not carried forward as a preferred option and is rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of Representations
Objections:
No objections to this site allocation.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28899

SW12/H: Horton Park Avenue

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW12/H - Horton Park Avenue	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage Impact Assessments • Flood risk /drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1251) is not carried forward as a preferred option and is excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Summary of Representations

Objections:

1. **Heritage Impact Assessment:**
   - Historic England commented that before allocating this site for development:

     (1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Conservation Area and Listed Buildings in its vicinity, and what impact development might have upon their significance.

     (2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area and Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.

(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area and any of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28900, 29201

SW13/H: Cannon Mills, Cannon Mill Lane / Union Road, Great Horton

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW13/H - Cannon Mills, Cannon Mill Lane / Union Road, Great Horton	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage Impact Assessments • Flood risk /drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1153 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Heritage Impact Assessment:**
   - Historic England commented that before allocating this site for development:

     (1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Conservation Area and Listed Buildings in its vicinity, and what impact development might have upon their significance.

     (2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area and Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.

(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area and any of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).

Support:

No representations received in support.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28901, 29236

SW14/H: Fenwick Drive, Woodside

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW14/H - Fenwick Drive, Woodside	32	32	23	2	7

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Site access • Loss of greenfield site • Impact on local environment • Impact on wildlife • Impact on heritage assets • Impact on local highways • Provision of public transport services • Impact on local services and infrastructure • Impact on existing community • Impact on local amenity • Impact on local drainage / flooding • Presence of major infrastructure • Former mining area • Impact on health and wellbeing • Principle of development • Proximity to heritage • Proximity to local wildlife site and woodlands	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1252 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site allocation: • Objections to proposed site allocation. • Site unsuitable for development • Objection to housing numbers - site over burdened.
2. Site access: • Objection to site access
3. Loss of greenfield site: • Proposal is excessive in scale and would result in many negative impacts on the environment. • Strong concerns were raised about the loss of green field sites in the built-up area and the damage to the appearance and setting of the environment. • Brownfield sites should be utilised first.
4. Impact on local environment: • The site is too close to Judy Woods and an ancient woodland. • Any development of this site will have a negative and damaging impact on the ancient woodland and its setting and an abundance of wildlife and habitats.
5. Impact on wildlife: • Development would be damaging to wildlife and habitats
6. Impact on agriculture land and farming practices: • Development would lead to the loss of agricultural / pasture land. The site is used for animal grazing.
7. Impact on heritage assets: • Site is close to Royds Hall, listed buildings cluster. • Development would have a negative impact on the setting of the listed buildings. • Historic England commented that before allocating this site for development:

- (1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.
- (2) If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.
- (3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).

8. Impact on local highway:

- Development would increase local traffic issues in the local area, i.e. issues with rat runs on Meadway, parking (around Woodside School) and the capability of roads to accommodate the levels of traffic.
- Fenwick Drive/Royds Hall Lane and their junctions with Halifax Road are not suitable for additional traffic.

9. Provision of public transport services:

- It was noted that the consultation report states that the site is on a high frequency bus route, however respondents claimed that there is only one bus per hour.

10. Impact on local services and infrastructure:

- Issues noted included the lack of local school places and difficulties accessing doctor surgeries.

11. Impact on existing community:

- Woodside Estate is overpopulated and run down, suggestion that additional housing will not improve the area but exasperate existing issues with anti-social behaviour. The quality of life of residents will be affected.

12. Impact on local amenity:

- The site is well used by local residents and is considered beneficial for the mental health, wellbeing and enjoyment of walkers, fishermen (dam), horse riders and sledgers.
- There are walks from Royds Hall to Royds Dam which are well used by residents.

13. Impact on local drainage / flooding:

- It was noted that the drainage would not be able to cope with additional housing in this location.
- The site is prone to flooding at the lower levels and it a wet site.

14. Presence of major infrastructure:

- The site is intersected by pylons – homes would be too close.
- The costs involved to redirect electricity lines will render the development unviable.
- Concerns over the health implications of the proximity to the pylons.

15. Former mining area:

- The site lies within a former mining area and there are old underground mines beneath which need to be considered.

16. Impact on health and wellbeing:

- Drastic loss of green spaces will be detrimental to the health and wellbeing of the community

Support:

1. Site allocation:

- Support for site allocation
- Confirmation provided of its availability from landowners

2. Principle of development:

- Development forms an acceptable and sustainable urban extension, contributing to the housing requirements Royds/Woodside.
- It would also support transformational change in the area and the regeneration of Woodside.
- It was noted that there has been a historic planning permission granted on the site in 2007.

3. Proximity to heritage assets:

- The potential adverse impact of the Grade II* listed building within the site appraisal was noted. It is noted that the proposed development would be designed with the setting of the heritage asset as a primary consideration.

Comment:

1. Proximity to major infrastructure:

- The site is crossed or is in close proximity to National Grid assets. Plans and guidance on developments near National Grid assets is provided.

2. Proximity to local wildlife site and woodlands

- The site lies near Judy Woods, local wildlife site and ancient woodland (irreplaceable habitat) which should be protected from direct/indirect disturbance. Reference made to NPPF para 175 – presumption against development resulting in the loss or deterioration or irreplaceable habitats.

3. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
4. Loss of greenfield site: • Loss off a green field site • Brownfield sites should be utilised first.
5. Impact on local highway: • Development would increase local traffic issues in the local area, i.e. issues with rat runs on Meadway, parking (around Woodside School) and the capability of roads to accommodate the levels of traffic.

Representation IDs: 206, 393, 395, 729, 909, 953, 1032, 1214, 1243, 1314, 1494, 3539, 3551 ,3815, 4474, 5712, 6164, 7355, 7517, 7952 ,8115, 10630, 11086, 11282, 11573, 13183, 13460, 17155, 19917, 27709, 28902, 29239, 30198

SW15/H: Thornton Road / Munby Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW15/H - Thornton Road/Munby Street	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk /drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, part of this site now has extant full planning permission for industrial use and is now an employment allocation identified as E82 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements. The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1253 and H1155) is not carried forward as a preferred option and is excluded and rejected. Further details of the reasons for the site being excluded (H1253) are included in the Strategic Land Assessment (SLA). Further details of the reasons for rejection (H1155) are included in the Site Assessment Methodology paper (Part B).

Summary of Representations
Objections:
No objections received to this site allocation.

Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is situated in Flood Zone 2, 3 and the current/draft 3b/3a(i) within the site boundary and adjoins FZ2 and the 2019 Draft 3b extent. • There is to be no development with the 3b/3a(i) extent unless considered water compatible or essential infrastructure. Additional guidance on appropriate flooding mitigation measures is provided.

Representation IDs: 28903

SW16/H: Cottam Avenue

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW16/H - Cottam Avenue	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on historic asset • Flood risk /drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission for industrial units (B2 and B8 use).

Summary of Representations

Objections:

No objections received to this site allocation.

Support:

1. **Impact on historic asset:**
   - Historic England confirmed that the site is adjacent to the Main Block to Harold Laycock Mills, a Grade II Listed Building.
   - The inclusion of a reference to the proximity of this designated heritage assets as a constraint in the sites pro forma is welcomed, and that the Development Considerations highlight that the design and layout of development should seek to protect the setting of the nearby listed buildings. This will alert potential developers of the need to take account of those elements which contribute to their significance and ensure that they are not harmed by development proposals.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28905, 29242

SW17/H: Briggella Mills, Little Horton Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW17/H - Briggella Mills, Little Horton Lane	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Scale of development • Allocation of site • Flood risk /drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1254 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. Scale of proposed development:

- Concerns that the draft Local Plan only identifies the site as being suitable (indicatively) for 200 residential units, and the Plan misses the opportunity to use this large previously developed site, located in a highly sustainable location, to assist the Council meet its shortfall of residential land and to meet its aspiration to develop the majority of housing allocations on Previously Developed Land. The vision is to achieve a high-density residential development (supported by an element of community uses), with a focus on creating a great place to live, supported by use of energy efficient/low carbon technology. It is considered the site is capable of delivering in excess of 700 dwellings and the draft Local Plan should be modified to reflect this higher number of units.

Support:

1. Allocation of site:

- Support for the allocation of this site.

2. Impact on historic asset:

- Historic England comment that Briggela Mill is a very impressive example of an intact integrated mill which, very unusually, has a five-storey block with a north-light roof. It provides a fine example of a largely complete textile manufacturing complex.
- Historic England's West Yorkshire's Historic Textile Mills: District of Bradford - Buildings at Risk Assessment Report (2019) identifies the mill complex as having a High Relative Heritage Value. As such, the mill should be treated as a non-designated heritage asset.
- Any development of this site should seek to retain and sensitively convert the mill buildings and other structures of interest.
- Historic England support the identification of Brigella Mills as a non-designated heritage asset in the pro forma for this site, and the intention that development should be of a high quality and sensitive design which retains and enhances the heritage asset.
- Support the intention to undertake a Heritage Impact Assessment for this site.

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 5550, 28906, 29245

SW18/H: Fall Top Farm, Brook Lane, Clayton

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW18/H - Fall Top Farm, Brook Lane, Clayton	9	9	7	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Impact on landscape setting • Impact on local habitats and wildlife • Flood risk /drainage • Impact on local sewers • Impact on leisure activities • Impact on health and well-being • Impact on local highways • Impact on local services/infrastructure • Impact on historic environment • Housing density • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1255 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Site allocation: • Objections to site allocation

• Argued that sites are not suitable for policy-compliant densities should not be allocated, irrespective of whether they are brownfield, greenfield or green belt.
2. Impact on landscape setting: • It was noted that the site cannot be development without significant negative impact on the historic landscape of Thornton and Clayton.
3. Impact on local habitats and wildlife: • Development would have a significant negative impact and would destroy habitats for local wildlife and plants.
4. Impact of flooding: • Concerned raised regarding the impact of flooding and pollution on adjacent land because of development of this site.
5. Impact on local sewers: • Concerns regarding the impact of additional loading placed on the existed public sewer system which has been demonstrated by the need for additional attenuation facilities being put in place to accommodate recent developments.
6. Impact on leisure activities: • The site/area is used by walkers therefore to develop it would have a native impact on the health and wellbeing of those that use it. • The site links to the Bronte Way and the Sustrans railway line walk.
7. Impact on health and wellbeing: • Valley is used for walking by families and has a huge benefit to health and wellbeing
8. Impact on the local highway: • Concerns relating to the increased volume of traffic and temporary construction traffic from any development. • Clayton roundabout cannot cope with the increasing levels of traffic. • Respondents highlighted the longstanding concerns regarding the suitability of Brook Lane to deliver additional vehicles dating back to the 2004 RUDP Inspectors report. The respondents have refuted the Council's suggested proposal for the creation of a new road to serve sites SW3/H, SW4/H and SW18/H by confirming that the landowner does not give consent for this and therefore is not deliverable.
9. Impact on local services / infrastructure: • Concerns if the local services and infrastructure to support such large development – for example schools, health centres and other key infrastructure would cope.

10. Impact on the historic environment:

- Historic England commented that before allocating this site for development:

  (1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.

  (2) If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.

  (3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).

11. Housing density:

- Sites that are not suitable for policy-compliant densities should not be allocated, irrespective of whether they are brownfield, greenfield or green belt.

Support:

1. Site allocation:

- Support for site allocation.
- Confirmation provided that the site is available.

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 598, 4297, 7136, 7950, 8168, 21755, 21760, 28907, 29246

SW19/H: Junction with Park Road, Manchester Road, Little Horton

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW19/H - Junction with Park Road, Manchester Road, Little Horton	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Flood risk /drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1256) is not carried forward as a preferred option and is rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of Representations

Objections:

No objections received to this site allocation.

Support:

1. **Site allocation:**
   - Support for site allocation.
   - The City Gate (Phoenix Village) site on Park Road represents one of the key regeneration opportunity sites within the southern part of the city that is already available and deliverable.

- It therefore is essential that this site is included within the Southern Gateway Regeneration Area, which is actively seeking regeneration and long-term change to current land use including new homes, new business opportunities and environment for sustainable urban living.
- Accordingly, the boundary of the Southern Gateway Regeneration Area should be redrawn to include the City Gate/Phoenix Village site.

Comment:

1. **Flood risk/drainage:**
   - The site is situated in Flood Zone 2, 3 and the current/draft 3b/3a(i) within the site boundary and adjoins FZ2 and the 2019 Draft 3b extent.
   - There is to be no development with the 3b/3a(i) extent unless considered water compatible or essential infrastructure. Additional guidance on appropriate flooding mitigation measures is provided.

Representation IDs: 13196, 28911

SW20/H: Quaker Lane, Southfield Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW20/H - Quaker Lane, Southfield Lane	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk /drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1257 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28912

SW21/H: Thornton Road, Leaventhorpe

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW21/H - Thornton Road, Leaventhorpe	4	3	2	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact of flooding / Pitty Beck • Impact on local highways • Flood risk – flood zone 2 and 3 • Consideration of biodiversity and Blue green infrastructure	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1258 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Impact of flooding / Pitty Beck:**
   - Flooding was a key concern for this site.
   - The lower end of the site should be excluded from any development to avoid increasing risk of flooding elsewhere. Flood attenuation must be of the highest quality on the rest of the site and the option to include additional flood management should be considered in any planning decision.
   - There is concern regarding the removal of soakaway for the catchment area of Pitty Beck. In February 2020 houses on the Middlebrook Estate flooded internally for the first time. As the site directly adjoins Pitty Beck, there is concern that development to see how any development will not lead to more water entering the beck and increasing the flood risk downstream.
   - This space is also a very attractive feature in an otherwise built up environment and is important as a part of the green corridor formed by the Bradford Beck/Pitty Beck valley. All areas like this should be protected from development.

2. Impact on local highways: • Concerns were raised about the existing volume of traffic on Thornton Road at busy times which will be exacerbated by further development.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is situated in Flood Zones 2, 3 and the current/draft 3b/3a(i) within the site boundary. • It contains a small area of FZ2 and 3 as well and the 2019 Draft 3b extent. Further guidance is provided on issues for consideration and mitigation measures.
2. Consideration of biodiversity and Blue green infrastructure: • Sites which are adjacent to or include rivers and becks within their boundary must make full consideration of the value of these features for biodiversity and blue-green infrastructure, as well as the wildlife habitat network. Existing infrastructure must be protected and enhanced to achieve the 10% net gain in the riverine of BNG.

Representation IDs: 4165, 4384, 28914, 29279

SW22/H: Baldwin Lane, Clayton

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW22/H - Baldwin Lane, Clayton	8	8	5	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objection to site allocation • Impact of flooding • Impact on local sewers • Impact on local highways • Impact on local services and infrastructure • Impact on local wildlife and environment • Housing density • Impact on the historic environment • Flood risk – flood zone 1 • Support for the site allocation • Confirmation of site availability • Proximity to SPA	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1259 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site allocation: • Several objections to site allocation. • The site boundary includes land (following the alignment of the railway tunnel) which is not approved for inclusion as part of this site allocation by the landowner. The boundary should be amended.

2. Impact of flooding: • Concerned raised regarding the impact of flooding and pollution on adjacent land because of development of this site.
3. Impact on local sewers: • Concerns regarding the impact of additional loading placed on the existed public sewer system which has been demonstrated by the need for additional attenuation facilities being put in place to accommodate recent developments.
4. Impact on the local highway: • Concerns were raised about the increase in traffic congestion, access and highway safety issues on an already bust Baldwin Lane. • A highways technical assessment provided suggests that there are a number of issues relating to achieving a suitable access to this site given the limitations of the current extent of its frontage.
5. Impact on local services / infrastructure: • Concerns if the local services and infrastructure to support such large development – for example schools, health centres and other key infrastructure would cope.
6. Impact on local wildlife and environment: • Concern was raised about the impact to the areas character, wildlife and environment
7. Housing density: • Sites that are not suitable for policy-compliant densities should not be allocated, irrespective of whether they are brownfield, greenfield or green belt.
8. Impact on the historic environment: • Historic England confirm that there are several Listed Buildings to the north, east and south of the site. • Whilst we welcome the inclusion of a reference to the proximity of designated heritage assets in the vicinity of as a Constraint in the sites pro forma, if allocated, the Plan should make it clear that development proposals for this area would need to ensure that those elements which contribute to the significance of this heritage asset are not harmed. Site SW22/H, add the following additional Development Consideration to the site pro forma: 'Development should conserve and, where possible, enhance those elements which contribute to the significance of heritage assets in the vicinity of the site.'
Support:
1. Site allocation: • Support for site allocation.

• Confirmation provided that the site is available.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Proximity to SPA: • Natural England confirmed that the sites lies in proximity to the South Pennine Moors (Phase 2) SPA and has potential to lead to the loss of functionally linked land for SPA birds. Further advice provided.

Representation IDs: 4300, 7137, 8169, 19898, 21756, 21761, 28915, 29247

SW23/H: Northside Road, Girlington

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW23/H - Northside Road, Girlington	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for site allocation • Site deliverability • Current site allocation/history • Site investigations – abnormal costs due to ground conditions • Flood risk /drainage – flood zone 1 • Proximity to heritage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission and is identified as H1260 in the Regulation 19 Local Plan.

Summary of Representations
Objections:
No responses received in objection.
Support:
1. Site allocation: • Support for site allocation • Site will make a significant contribution to the overall housing requirement in a suitable and sustainable urban location.
2. Site deliverability:

- The site is deliverable which will assist in delivering 5-year housing land supply. It is not necessary for the development to be placed in a later phase of the plan.
- NPPF (para 68) seeks to promote the development of a good mix of sites. The site would provide a modest amount of growth of approximately 60 no. dwellings.

3. Current site allocation / planning history:

- The site is identified as a playing pitch under Policy OS4 (RUDP), however has not been in active sports use for over 10 years. Given its proximity to an area of recreation open space located adjacent to the site, it is considered that the proposed development would not result in any deficiency in the locale.
- Site has been subject of previous planning permissions for residential development, dating from the early/mid 1990's.

4. Site investigations:

- A stage 2 site investigation has been undertaken. Abnormal costs to development arising from the ground conditions are understood.

5. Risk of flooding:

- It was noted that the site is at 'very low' risk of surface water flooding.

6. Proximity to heritage:

- It is not located within a conservation area and does not contain any listed buildings. Extensive development within the land surrounding these assets - now located in a firmly modern context within no legibility of their historic surroundings. It is not considered that the proposed development will cause harm to the significance of these heritage assets through changes within their wider surroundings.

Comments:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 24608, 28916

SW24/H: Northside Road, Girlington

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW24/H - Northside Road, Girlington	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk /drainage – flood zone 1	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1261) is not carried forward as a preferred option housing site and is rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B). Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant outline planning permission for commercial development and is now an employment allocation identified as E83 in the Regulation 19 Local Plan.

Summary of Representations
Objections:
No objections received to this site allocation.
Support:
There were representations in support for this allocation.
Comment:

1. **Flood risk/drainage:**
    - The site is located with Flood Zone 1 (FZ1).
    - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28917

SW25/H – Lingdale Road, Woodside

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW25/H - Lingdale Road, Woodside	10	10	7	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objections to site allocation • Impact on the Green Belt • Impact on wildlife • Flood risk /drainage • Impact on local services/infrastructure • Impact on local highways • Proximity to major infrastructure • Proximity to hazardous sites • Historical land uses • Impact on health and well-being • Use of previously developed land	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1262 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site allocation: • Objections to site allocation.

• Reference made by one respondent to presumably historic planning activities involving a master plan for adjoining site SW14/H and high levels of objections pre 2005.
2. Impact on the green belt: • Objections to development of a green belt site.
3. Impact on wildlife: • Any development would be damaging to wildlife and their habitats.
4. Impact on local services / infrastructure: • Concerns if the local services and infrastructure to support such large development – for example schools for full.
5. Impact on local highways: • Respondents highlighted traffic problems in the area and the road treated like a race track.
6. Flood risk: • The site is known for flooding towards the bottom end of the field.
7. Proximity to major infrastructure: • The site lies within a 200m buffer zone of overhead power lines.
8. Proximity to hazardous sites: • The site lies within the outer tier consultation zone for the designated major hazard site (BASF and Nufarm).
9. Historical land uses: • It was noted that the site is within an historic coal mining area. • Presence of a potential mine shaft entry / coal workings at the north-eastern corner of the site.
10. Impact on health and wellbeing: • Loss of fields would be detrimental to health
Support:
1. Site allocation:

• Whilst acknowledging any development will result in the loss of green space, it was noted that the site allocation stating it is modest in size and houses have already been built in the area. If consideration is given to access and space in any new development on this site, it would be considered appropriate.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. **Use of previously developed land:** • It was questioned why there is a need to build on green belt land when there are many brownfield sites within Bradford, including derelict properties and mills.
3. Impact on local highways: • Respondents highlighted traffic problems in the area and the road treated like a race track.

Representation IDs: 731, 740, 1496, 4462, 4691, 4739,7953, 8116, 11087, 28918

SW26/H – Abb Scott Lane, Low Moor

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW26/H - Abb Scott Lane, Low Moor	11	11	10	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Housing numbers • Site access • Impact on the Green Belt • Impact on wildlife and biodiversity • Flood risk /drainage • Impact on local services/infrastructure • Impact on visual amenity • Impact on heritage assets • Proximity to other site allocations • Proximity to hazardous sites • Historical land uses • Impact on health and well-being • Use of previously developed land • Historical land uses • Housing design	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission and is identified as H1263 in the Regulation 19 Local Plan..

Summary of Representations
Objections:
1. Site allocation: • Several objections to site allocation.
2. Housing numbers: • Disagree with housing numbers and density • Lack of comprehensive urban capacity study. • Reference to the New Home Bonus Scheme
3. Site access: • Access to and from the site must be fully investigated to understand the additional capacity forced on existing junctions. • Also access to the dam, Judy Woods and existing rights of way should be maintained.
4. Impact on the green belt: • Objections to development of a green belt site when a brownfield site is in close proximity. • Noted that this site and SW14 & SW34 are the only remaining green spaces left in the area. The extent of these developments combined will effectively link up the built-up areas of Low Moor with Woodside.
5. Proximity to other site allocations: • Proximity of this site to further proposed sites for housing allocation was a local concern. The impact of both sites, if developed, should be considered when reviewing the impact on the local community and road infrastructure.
6. Impact on wildlife and biodiversity: • Concern raised that any development would have a negative impact on other woodland areas and the biodiversity around the site.
7. Impact on visual amenity: • Concerns that the development would affect views of existing properties on Abb Scott Lane.
8. Impact on heritage assets: • Impact on nearby heritage assets – grade II listed buildings. • Historic England commented that before allocating this site for development:

(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.
(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.
(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).

9. Impact on local services / infrastructure:

- Concerns if the local services and infrastructure to support such large development – for example schools for full.

10. Impact on local highways:

- Concerns regarding the increase in levels of traffic, capacity at junctions and noise pollution on Abb Scott Lane.

11. Flood risk:

- The site is known for flooding in the winter months.
- Potential breaches of the adjoining dam.

12. Proximity to major infrastructure:

- The site lies within a 200m buffer zone of overhead power lines.

13. Proximity to hazardous sites:

- The site lies within the outer tier consultation zone for the designated major hazard site (BASF and Solenis UK Industries).

14. Historical land uses:

- It was noted that the site is within an historic coal mining area and subsidence could be an issue on this site.
- Mine entry shafts are within the central area of the site.

15. Housing design:

- Attention should be given to the design of dwellings as nearby developments are not in keeping with the area

Support:

No representations received in support.

Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 1497, 3397, 3576, 3579, 4195, 4466, 4567, 4610, 6165, 17156, 28920, 29248

SW27/H – Paradise Fold, Great Horton

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW27/H - Paradise Fold, Great Horton	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proximity to heritage asset • Flood risk /drainage – flood zone 1	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1264) is not carried forward as a preferred option and is rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of Representations

Objections:

1. **Proximity to heritage asset:**
   - Historic England commented that before allocating this site for development:

     (1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.

     (2) If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.

(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28921, 29249

SW28/H: Abb Scott Lane, Low Moor

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW28/H - Abb Scott Lane, Low Moor	5	5	2	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Site availability • Impact on trees • Impact on local highways • Proximity to hazardous site • Flood risk /drainage • Visual amenity of site	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1265 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site allocation: • Objection to site allocation. • Proximity to other site allocations
2. Site availability: • It was highlighted that there are significant constraints and legal challenges on these sites. • There are alleged to be publicly owned sites in the matter of 400 Acres of Low Moor Land protected under parliamentary Act it should be noted that land does not belong to the Council they are merely the Custodian of a Benevolent Gift which technically must remain for the giving of recreation to the poor of North Bierley.

3. Impact on trees: • Development would result in the loss of trees.
4. Impact on local highways: • Development would have an impact on the increased level of cars on Abb Scott Lane.
5. Proximity to hazardous sites: • The site lies within the outer tier consultation zone for the designated major hazard site (BASF and Solenis UK Industries).
Support:
1. Site allocation: • Support for site allocation.
2. Existing site use: • It is a predominantly brownfield site with new build properties to one side. • The site is currently fenced off with no obvious current purpose and is not in use.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Impact on local highways: • Traffic issues exiting from Abb Scott Lane onto Huddersfield Road is a difficult at times with long queues forming. • There are traffic issues on Abb Scott Lane diverts issues onto Common Road as well. • Development may result in impact on traffic levels on Abb Scott Lane and Common Road, this should not be underestimated. • If the site is allocated there would be a need for part time traffic lights to allow for easier access to Huddersfield Road.
3. Visual amenity of the site: • Site is currently an eyesore/not looked after therefore development might be acceptable.

Representation IDs: 1499, 3627, 4575, 28922, 30197

SW29/H - Harris Court Mill, Great Horton Road, Great Horton

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW29/H - Harris Court Mill, Great Horton Road, Great Horton	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on historic asset • Flood risk /drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1185) is not carried forward as a preferred option and excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Summary of Representations

Objections:

1. **Impact on historic asset:**
   - Historic England commented that before allocating this site for development:
     (1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.
     (2) If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.
     (3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).

Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28923, 29250

SW30/H - Brafferton Arbor, Buttershaw

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW30/H - Brafferton Arbor, Buttershaw	3	3	1	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Provision of open space • Flood risk /drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1267) is not carried forward as a preferred option and is rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of Representations
Objections:
1. Provision of open space: • It is believed that this site was part of the provision of on-site recreation and open space by one of the developers engaged in new homes provision on Buttershaw as part of the SRB. It is understood that the developer has paid a sum to the council for the adoption and maintenance of this open space.
Support:
No representations received in support.
Comment:

1.	**Flood risk/drainage:** • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2.	No concerns developing this site highlighted in Buttershaw.

Representation IDs: 17157, 28924, 30195

SW31/H - Former Odsal Clinic 55 Odsal Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW31/H - Former Odsal Clinic 55 Odsal Road	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk /drainage – flood zone 1	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1268) is not carried forward as a preferred option and is excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Summary of Representations
Objections:
No objections received to this site allocation.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28925

SW32/H - Church Street, Buttershaw

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW32/H - Church Street, Buttershaw	5	5	3	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Site access • Flood risk /drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1269) is not carried forward as a preferred option and is excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Summary of Representations

Objections:

1. **Site allocation:**
   - Objections to site allocation.

2. **Site access:**
   - Site access via an unadopted road to the north and access to the south is via a busy road and congested.
   - Questions raised of sustainability without significant enabling works to the access.
   - It was pointed out that the site is not access from Odsal Road, as stated in the report.

Support:

No representations received in support.

Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Site allocation: • No concerns about developing this site.

Representation IDs: 4465, 4705, 17158, 28926, 30196

SW33/H - Land off Buckingham Crescent, Clayton

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW33/H - Land off Buckingham Crescent, Clayton	12	11	5	5	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • SIte allocation • Green Belt • Housing density • Flood risk /drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1270 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site allocation: • Objections to site allocation.
2. Green belt: • Respondents noted that the land is greenbelt and is an important green corridor formed by the Bradford Beck/Clayton Beck valley. • It should be protected from development.
3. Housing density: • This site appears to be proposed for extremely low development density which is unsustainable in any location and not compatible with the strategy.

- Sites not suitable for policy compliant densities should not be allocated, irrespective of their allocation.

4. Impact on local sewers:

- Concerns regarding the impact of additional loading placed on the existed public sewer system which has been demonstrated by the need for additional attenuation facilities being put in place to accommodate recent developments.

5. Impact on the local highway:

- Concerns were raised about the increase in traffic congestion, access and highway safety issues.

6. Impact on local services / infrastructure:

- Concerns if the local services and infrastructure to support such large development – for example schools, health centres and other key infrastructure would cope.

7. Impact on the historic environment:

- Concerns relating to the potential impact on heritage within the vicinity of the site.
    - (1) Recommendations for an assessment is undertaken to determine the contribution the site makes to those elements which contribute towards the significance of the listed building in the vicinity and impact development may have on its significance.
    - (2) If the development of the site would harm elements of which contribute to the significance of the listed building, then measures which that harm might be removed should be tied into the plan.
    - (3) If it is concluded that the development would still likely harm elements that contribute to the significance of the listed building, the site should not be allocated unless there is clear public benefits that outweigh the harm (as is required by NPPF, para 195 or 196)

8. Flood risk:

- Concerns about the potential flood risk and pollution to adjacent land cannot be mitigated.
- The topography makes surface water disposal in a controlled manner to the Hole Bottom Beck an extreme challenge.

9. Impact on local habitats and wildlife:

- Development would have a significant negative impact and would destroy habitats for local wildlife and plants.

10. Land stability:

- Deep lane has been closed for some time due to instability of the land. Therefore there is a danger of landslides if the land is disturbed.

Support:

1. Site allocation: • Site is capable of contributing to the identified shortfall of housing provision. • There are no known viability issues or environmental constraints that cannot be dealt with via appropriate design. • The site would form a logical extension to the urban edge of Clayton and would not lead to urban sprawl or the coalescence of settlements. • The site is both available and achievable as per the tests of the NPPF.
2. Green belt: • The land is no longer considered to meet the five greenbelt purposes and should be released.
3. Site access: • There are several potential access options and a highways consultant will be commissioned to confirm the most appropriate location for access.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Timescale for development: • Query raised regarding the timescale which have been applied; the council considers the site is deliverable between 6-10 years of the plan, however this is considered to be conservative. The site could be delivered within the first 5 years of the plan period.

Representation IDs: 4172, 4304, 4371, 8170, 23648, 23651, 23654, 23657, 28927, 29251, 29719, 29720

SW34/H – Meadway, Wibsey

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW34/H - Meadway, Wibsey	12	12	8	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Proximity to ancient woodland • Provision of open space • Impact on local highway • Historical land uses • Flood risk /drainage • Loss of greenfield site • Formatting errors	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1271) is not carried forward as a preferred option and is excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Summary of Representations
Objections:
1. Site allocation: • Objections to site allocation.
2. Proximity to ancient woodland: • Development would have an impact on the ancient woodland, loss of trees and wildlife.
3. Provision of open space: • Development would leads to the removal of further green spaces from the estate.

4. Impact on local highway: • Concerns were raised about current levels of traffic, highway safety and parking (particularly near the school). • Any development will increase pressure on the surrounding roads.
5. Historical land uses: • It was noted that the site is within an historic coal mining area.
Support:
1. Site allocation: • Support for site allocation. • Noted that the site is part of the former youth club and does not affect the existing playground area. • Suggestion that Meadway is widened as part of any development as it currently struggles to support existing volumes of traffic.
Comments:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Loss of greenfield site: • Strong concerns were raised about the loss of green field sites in the built-up area. • Brownfield sites should be utilised first.
3. Proximity to ancient woodland: • The site lies on or in close proximity to woodlands and trees identified in the ancient woodland and veteran trees inventories. NPPF para 175 sets out a strong presumption against development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland or veteran trees)
4. Formatting errors: • Meadway is located in Woodside, not Wibsey.

Representation IDs: 1500, 3639, 3641, 4464, 4558, 6163, 7951, 8114 ,11085 ,13461, 17159, 19918 ,28928

SW35/H – All Saints Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW35/H - All Saints Road	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk /drainage – flood zone 1	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1272) is not carried forward as a preferred option and is rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The majority of the site is identified as being within the 2019 Draft 3b extent flood zone as such should not be considered for allocation until the SFRA is updated. Further guidance is provided.

Representation IDs: 28929

SW36/H – Highgate Road, Clayton Heights

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW36/HC - Highgate Road, Clayton Heights	6	6	2	2	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Site access • Proximity to major infrastructure • Flood risk /drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant outline planning permission and is identified as H1273 in the Regulation 19 Local Plan..

Summary of Representations

Objections:

1. **Site allocation:**
   - Objections to site allocation.

2. **Site access:**
   - Access issues to site from main road.
   - The junction at Highgate Road and Linfield Terrace is considered dangerous as it is almost a blind corner.
   - There are concerns relating to the increased volume of traffic and temporary construction traffic from any development.
   - Consideration should be given to special transport measures to ensure highway safety.

Support:

1. **Site allocation:**
   - Support for site allocation.

• Despite being close to a local beauty attraction, there would be a low number of houses that will be close to the roadside.
Comment:
1. Proximity to major infrastructure: • The site is crossed or is in close proximity to National Grid assets. Plans and guidance on developments near National Grid assets is provided.
2. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 4306, 4644, 5681, 11249, 27713, 28930

SW37/H – Cousen Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW37/H - Cousen Road	3	3	2	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Impact on heritage asset • Flood risk /drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1274 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Site allocation:**
   - Objections to site allocation.

2. **Impact on heritage asset:**
   - Concern raised relating to the potential impact on heritage within the vicinity of the site.

     (1) Recommendations for an assessment is undertaken to determine the contribution the site makes to those elements which contribute towards the significance of the listed building in the vicinity and impact development may have on its significance.

     (2) If the development of the site would harm elements of which contribute to the significance of the listed building, then measures which that harm might be removed should be tied into the plan.

     (3) If it is concluded that the development would still likely harm elements that contribute to the significance of the listed building, the site should not be allocated unless there is clear public benefits that outweigh the harm (as is required by NPPF, para 195 or 196)

Support:
No comments received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 4537, 28931, 29252

SW38/H – Dovedale Road, Bankfoot

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW38/HC - Dovedale Road, Bankfoot	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk /drainage – flood zone 1	Since the consultation on the Regulation 18 Local Plan was undertaken, this site has now been developed out and is in residential use and is therefore no longer allocated in the Plan.

Summary of Representations
Objections:
No comments received in objection.
Support:
No comments received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28932

SW39/H – Bowman Road, Wibsey

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW39/H - Bowman Road, Wibsey	20	20	19	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Site access • Site availability • Housing density • Designation of open space • Impact on local wildlife • Impact on flood risk • Impact on sewage/drainage • Impact on former land uses • Flood risk /drainage • Impact on local services/infrastructure • Impact on local highways	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1275 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site allocation: • Several objections to site allocation.

2. Site access: • Issues relating to access to the site from Bowman Road as it is narrow and any development would increase the number of cars and traffic on top of current school traffic. • Proximity to St Winifred's School and the prevalence of existing parking issues, rear of school access and child safety.
3. Site availability: • Query if the land contained a covenant following information of the site being transferred from the school ownership and Council leased.
4. Housing density: • Concern that 44 houses was excessive for this site.
5. Designation as open space: • Loss of designated open space • Site used by children and dog walkers
6. Impact on local wildlife: • Site is a key local wildlife area for a variety of species (foxes, badgers and bats).
7. Impact on flood risk: • Concerns regarding on/off site flooding issues. • Respondents highlighted the presence of natural springs and past remedial works to the site to alleviate flooding issues to houses on Bowman Road/Avenue. • There was overwhelming concern that any development would result in the re-emergence of localised flooding issues
8. Impact on sewage/drainage: • It was noted that a sewer / springs/ culvert that runs beneath the site. • Reference made to an underground culvert runs underneath St. Pauls Grove to between Bowman Road and Buttershaw Clinic. This has leaked into the field for the last 30 years.
9. Impact of former land uses: • Former mining activity and presence of mine shafts.
10. Impact on local services / infrastructure: • Concern over the current demands for school places and access to GPS which will only be exacerbated.

11. Impact on local highways: • Development would have an impact on the increased level of traffic in the area. • Road affected by school traffic at present, which will get worse.
Support:
No comments received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 674 675 ,682, 714, 718 ,719, 721, 787, 799, 849, 1364, 2117, 4640, 11649, 11676, 15765, 23460, 28482, 28486, 28933

SW40/H – Northside Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW40/H - Northside Road	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk /drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1224) is not carried forward as a preferred option and is rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of Representations
Objections:
No comments received in objection.
Support:
No comments received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28934

SW41/H – Blamires Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW41/HC - Blamires Street	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk /drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1277 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

No objections received to site allocation.

Support:

No comments received in support.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28935

SW42/H – Former Pub, Reevy Road, The Crescent, Buttershaw

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW42/HC - Former Pub, Reevy Road, The Crescent, Buttershaw	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Support for site allocation • Flood risk /drainage – flood zone 1	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1225 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

No objections received to site allocation.

Support:

1. **Site allocation:**
   - Support for site allocation.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28936, 30194

SW43/H – Bell House, Southfield Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW43/H - Bell House, Southfield Lane	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on heritage asset • Flood risk /drainage – flood zone 1	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as part of the larger site H1556 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. Impact on heritage asset:

- Concern raised relating to the potential impact on heritage within the vicinity of the site.

  (1) Recommendations for an assessment is undertaken to determine the contribution the site makes to those elements which contribute towards the significance of the listed building in the vicinity and impact development may have on its significance.

  (2) If the development of the site would harm elements of which contribute to the significance of the listed building, then measures which that harm might be removed should be tied into the plan.

  (3) If it is concluded that the development would still likely harm elements that contribute to the significance of the listed building, the site should not be allocated unless there is clear public benefits that outweigh the harm (as is required by NPPF, para 195 or 196)

Support:

No comments received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28937, 29254

SW47/E – Between Clayton Lane and Lister Arms, Manchester Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW47/E - Between Clayton Lane and Lister Arms, Manchester Road	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on heritage asset • Flood risk /drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site is now a housing allocation and is identified as H1163 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. Impact on heritage asset:

- Concern raised relating to the potential impact on heritage within the vicinity of the site.

  (1) Recommendations for an assessment is undertaken to determine the contribution the site makes to those elements which contribute towards the significance of the listed building in the vicinity and impact development may have on its significance.

  (2) If the development of the site would harm elements of which contribute to the significance of the listed building, then measures which that harm might be removed should be tied into the plan.

  (3) If it is concluded that the development would still likely harm elements that contribute to the significance of the listed building, the site should not be allocated unless there is clear public benefits that outweigh the harm (as is required by NPPF, para 195 or 196)

Support:

No comments received in support.
Comment:
1. Flood risk/drainage: • The site is situated in Flood Zone 2, 3 and the current/draft 3b/3a(i) within the site boundary. • There is to be no development with the 3b/3a(i) extent unless considered water compatible or essential infrastructure. Additional guidance on appropriate flooding mitigation measures is provided.

Representation IDs: 28887, 29195

SW48/E – Ingleby Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SW48/E - Ingleby Road	2	1	0	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk /drainage – flood zone 2 and 3	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains an employment allocation and is identified as E85 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No objections received to site allocation.
Support:
No comments received in support.
Comment:
2. Flood risk/drainage: • The site is situated in Flood Zone 2, 3 and the current/draft 3b/3a(i) within the site boundary and adjoins FZ2 and the 2019 Draft 3b extent. • There is to be no development with the 3b/3a(i) extent unless considered water compatible or essential infrastructure. Additional guidance on appropriate flooding mitigation measures is provided.

- Further information supplied states that sites that are adjacent to or include rivers and becks within their boundary must make full consideration of the value of the features for biodiversity and blue-green infrastructure as well as the wildlife habitat network, and where existing, should be protected and opportunity taken to enhance these to achieve 10%net gain in the riverine element of biodiversity net gain.

Representation IDs: 28888, 29277

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 88 within the consultation document.

Summary of Consultation

A total of **13** representations were received in relation to Question 88 from **10** respondents. Respondents included Highways England, local residents, the NHS and a house builder. **Table Error***! No text of specified style in document.* (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 73.9**.

Table Error! No text of specified style in document.**: Consultation Question 88: Bradford South West Preferred Site Allocations - Overview of Representations Received**

Consultation Question	Number of Representations	Number of Respondents	Object	Support	Comment
Q88	13	10	11	0	2

Table 73.9: Consultation Question 88: Bradford South West Preferred Site Allocations - Summary of Representations Received

Bradford South West Preferred Site Allocations

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Use of Previously Developed Land • Loss of the Green Belt • Loss of open green spaces • Impact on local services/infrastructure • Impact on local highways • Brigella Mills	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BSW1: Bradford South West, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

• Rejected sites • Proposed additional sites • Impact on traffic • Disproportionate housing distribution to Bradford South West	

Summary of Representations
Objections
1. Use of Previously Developed Land: • It was argued that there are enough brownfield sites within Bradford that have not been developed.
2. Loss of the Green Belt: • Green Belt sites should be removed from the plan. • Clayton Heights – two local councillors raised concerns about the excessive use of green belt land.
3. Loss of open green spaces: • Whilst some sites are acceptable for development, the sites around Woodside (SW26/H, SW14/H and SW34/H) would remove the only bit of green space left in the area.
4. Impact on local services/infrastructure: • Clayton Heights – two local councillors raised concerns about the provision of school places and GP services to accommodate further development.
5. Impact on local highways: • Clayton – development is inappropriate as the local roads cannot cope with additional traffic.
6. Brigella Mills: • The Local Plan identifies the site being suitable (indicatively) for 200 residential units, whereas it is argued that the site could deliver in excess of 700 dwellings and the plan should be modified to reflect the higher figure.
7. Rejected sites:

- Object to the failure to allocate SW/034B for housing, arguing that the deletion of the Green Belt is justified and that the site is deliverable and developable and would assist in meeting the housing need across the district. The site complies with the settlement strategy and there would be no significant impact on heritage assets at Royds Hall. The scoring in the SA indicates this site performs better (on biodiversity, geodiversity and accessibility) than green belt sites identified. It is noted that the preferred sites would trigger significant effects on the SPA/SAC whereas this site would not.

- Objection to rejected site SW/004 and that there is no suitable highway access. Data provided indicates access can be provided from Holts Lane / Delph Drive through an extension of the adopted highway. Site provides a logical extension to recent development boundary and is well located with no known viability issues or environmental constraints that cannot be dealt with via appropriate design.

- Objection to rejected site SW/146. Highway access can be gained using an adoptable but slightly amended highway arrangement. There are no known viability issues or environmental constraints which cannot be dealt with via appropriate design.

8. Proposed additional sites (call for sites):

- Phoenix Village (formally known as City Gate) for mixed use residential development of 400 dwellings.

9. Proposed additional sites (call for sites):

- Land to the south of Clarges Street for approximately 60 dwellings

Support

No representations received in support.

Comments

1. Impact on the highway network:

- Highways England commented that whilst locating development within Bradford South West, on their own, will not have a severe impact on the Strategic Road Network (SRN), the wider cumulative impact within the Bradford South West area and the rest of the development aspirations within the plan could severely impact the SRN.
- This cumulative impact will need to be established by the Council and considered by Highways England.

2. Impact on traffic:

- Concerns raised by a local councillor about the impact on local traffic around schools, particularly on Abb Scott Lane.

3. Disproportionate housing distribution to Bradford South West:

- Concerns raised by a local councillor that the total housing numbers allocated towards Bradford South West is seemingly disproportionately high compared with other areas.

Representation IDs: 498, 741, 3859, 4637, 5557, 5567, 5594, 5669, 5842, 15435, 17527, 23641, 23642

BRADFORD NORTH WEST

Introduction

The Local Plan settlement hierarchy identifies Bradford North West as one of four quadrant areas within the wider Regional City of Bradford. It includes the wards of Heaton Manningham, Toller, Girlington, Allerton, the northern part of Clayton and Fairweather Green and a small part of Shipley.

It is proposed that the Bradford North West quadrant will deliver 2,900 homes over the plan period (2020 to 2038) on a mix of committed sites and new allocations comprising of 16 brownfield sites comprising previously used land and buildings, 6 are mixed (brownfield and greenfield), 14 predominantly greenfield site. Six sites lie within the current Green Belt and the remaining sites are within the urban area.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Bradford North West's characteristics, and for the purpose of supporting community/neighbourhood approach to the future development strategy, sets out a series of Local Area Strategies for different areas:

- Allerton
- Girlington
- Heaton
- Manningham

These were listed as questions 89 to 92 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **18** representations were received in relation to the Bradford North West spatial portrait and Local Area Strategy (Questions 89 to 92) from **17** respondents. Respondents included Highways England, Historic England, National Grid, local residents, landowners, a house builder and Town/Parish Council. **Table Error**! No text of specified style in document.**.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in

Consultation Question 89 - Allerton Portrait & Local Area Strategy

Table Error! No text of specified style in document..**2**.

Table Error! No text of specified style in document.**.1: Overview of Representations Received - Consultation Questions 89-92: Bradford North West Portrait & Local Area Strategy**

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
Q89	Allerton Portrait & Local Area Strategy	10	10	4	5	1
Q90	Girlington Portrait & Local Area Strategy	1	1	0	0	1
Q91	Heaton Portrait & Local Area Strategy	5	4	3	0	2
Q92	Manningham Portrait & Local Area Strategy	2	2	1	0	1
	Totals	**18**	**17**	**8**	**5**	**5**

Consultation Question 89 - Allerton Portrait & Local Area Strategy

Table Error! No text of specified style in document.**.2: Summary of Representations Received – Allerton Portrait & Local Area Strategy**

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
Q89	Allerton Portrait & Local Area Strategy	10	10	4	5	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on local infrastructure/services • Impact on local highway network • Impact on wildlife • Flood risk • Support for the area strategy	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BNW1: Bradford North West, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Development on Green Belt land: • The use of brownfield land should be maximised first, of which there were numerous examples across the District. • Green belt sites should be removed from the plan. • Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed.

2. Impact on local infrastructure/services:

- The area currently faces pressures on local schools and health care services. No consideration given to improving infrastructure.
- There are limited buses into these areas.

3. Impact on the local highway network:

- Allocations in Bradford North West and adjacent areas appear to have been made without due regard to the cumulative impacts on carbon emissions, traffic congestion and transport infrastructure, particularly Sandy Lane village and the cross roads.
- The existing road network is at breaking point.

4. Impact on wildlife:

- Wildlife will be impacted, such as deer around Sandy Lane.

5. Flood risk:

- Development would cause greater potential for flooding in Cottingley as culverts will not cope.

Support:

1. Allocation of new housing:

- Support for the area strategy, in particular the allocation of new housing sites including green belt sites such as Allerton Road, Prune Park Lane to support new quality housing, strong natural landscaping and public open spaces as these contribute to place making.
- Development would so benefit the wider economic, environmental and social development of the Regional City.

Comments:

1. Impact on highway network:

- Development within Bradford North West would not on its own have a severe impact on the Strategic Road Network (SRN).
- The wider cumulative impact within the Bradford South West area and the rest of the development aspirations within the plan could severely impact the SRN.
- It was noted that any cumulative impacts would need to be identified as part of the transport evidence being prepared and considered by Highways England.

Representation IDs: 502, 3316, 15436, 17059,18924, 18934, 18944, 18954, 27965, 30265

Consultation Question 90 - Girlington Portrait & Local Area Strategy

Table Error! No text of specified style in document..**3 Summary of Representations Received – Girlington Portrait & Local Area Strategy**

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
Q90	Girlington Portrait & Local Area Strategy	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on highways network	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BNW1: Bradford North West, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
No representations in objection received
Support:
No representations in support received
Comments:
1. Impact on highway network: • Development within Bradford North West would not on its own have a severe impact on the Strategic Road Network (SRN).

- The wider cumulative impact within the Bradford South West area and the rest of the development aspirations within the plan could severely impact the SRN.
- It was noted that any cumulative impacts would need to be identified as part of the transport evidence being prepared and considered by Highways England.

Representation ID: 15437

Consultation Question 91 - Heaton Portrait & Local Area Strategy

Table Error! No text of specified style in document..**4: Summary of Representations Received – Heaton Portrait & Local Area Strategy**

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
Q91	Heaton Portrait & Local Area Strategy	5	4	3	0	2

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Development on Green Belt land • Impact on local infrastructure/services • Impact on local highway network • Provision of walking infrastructure	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BNW1: Bradford North West, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance. .

Summary of Representations
Objections:
1. Development on Green Belt land: • The use of brownfield land should be maximised first, of which there were numerous examples across the District. • Green belt sites should be removed from the plan. • With reference to NW19/H & NW13/H – The Local Area Strategy and Site Allocations Map should be amended to rectify errors displaying the sites as being within the green belt whilst identified in the plan as a site for removal from the green belt boundary and a preferred housing sites.
Support:
No representations in support received

Comments:
1. Impact on local infrastructure/services: • There has been a substantial reduction in the bus timetable towards Bradford and Bingley with services now running hourly when this was previously every half hour.
2. Provision of walking infrastructure: • Plans ignore the importance of ginnels as safe play areas for children's walking routes and micro ecologies. More emphasis should be placed on their conservation.
3. Impact on highway network: • Development within Bradford North West would not on its own have a severe impact on the Strategic Road Network (SRN). • The wider cumulative impact within the Bradford South West area and the rest of the development aspirations within the plan could severely impact the SRN. • It was noted that any cumulative impacts would need to be identified as part of the transport evidence being prepared and considered by Highways England.

Representation IDs: 265, 501, 15438, 27091, 27105

Consultation Question 92 - Manningham Portrait & Local Area Strategy

Table Error! No text of specified style in document.**.5: Summary of Representations Received – Manningham Portrait & Local Area Strategy**

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
Q92	Manningham Portrait & Local Area Strategy	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage • Impact on highways network	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BNW1: Bradford North West, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Heritage: • The Area Strategy should emphasise that a heritage led approach to regeneration is required due to it being a Victorian suburb with four conservation areas which are listed in the 2020 Heritage at Risk Register. • Suggested amendment to first sentence of the first bullet point to read: *'Significant new housing growth from the area which is a key location for heritage-led regeneration as a means of reinvigorating this part of the City whist conserving its distinctive local character and rich historic environment.'*
Support:

No representations in support received
Comments:
1. Impact on highway network: • Development within Bradford North West would not on its own have a severe impact on the Strategic Road Network (SRN). • The wider cumulative impact within the Bradford South West area and the rest of the development aspirations within the plan could severely impact the SRN. • It was noted that any cumulative impacts would need to be identified as part of the transport evidence being prepared and considered by Highways England.

Representation IDs: 15439, 29099

Sites

As highlighted above, **36** sites were put forward in the Preferred Options document to meet the proposed development requirements for Bradford North West (all for residential). Under Q95 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **136** representations were received in relation to policies NW1/H to NW36/H from **131** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents, landowners, organisations and Parish/Town Council. **Table 74.** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in

Table Error! No text of specified style in document..**7**.

Table 74.6: Overview of Representations Received – Bradford North West Proposed Sites (NW1/H to NW36/H)

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW1/HC: Snowden Street	1	1	0	0	1
NW2/H: Drummond Trading Estate, Lumb Lane	2	2	1	0	1
NW3/HC - Spring Bank Place	1	1	0	0	1
NW4/H: Mansfield Road	2	2	1	0	1
NW5/H: St Marys Road	2	2	1	0	1
NW6/H: Derelict mill and single storey industrial buildings, Priestman Street	1	1	0	0	1
NW7/H: Acacia Drive, Sandy Lane	18	18	15	1	2
NW8/H: High Ash Farm, Allerton Road, Allerton	9	9	4	4	1
NW9/H: Wilsden Road/West Avenue, Sandy Lane	12	11	7	3	2
NW10/H: Allerton Road, Prune Park Lane	19	19	8	10	1
NW11/H: North Parade, Allerton	2	2	1	0	1
NW12/H: Lynfield Drive, Daisy Hill	1	1	0	0	1
NW13/H: Millmoor Close	6	4	3	1	2
NW14/H: Chellow Lane	1	1	0	0	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW15/H: Former Merrivale Arms Public House and Surrounds, Merrivale Road, Allerton	4	3	3	0	1
NW16/H: Allerton Lane/Chevet Mount (1)	1	1	0	0	1
NW17/H: Allerton Lane/Chevet Mount (2)	1	1	0	0	1
NW18/H: Haworth Road, Playing fields, Heaton	3	3	1	0	2
NW19/H: Bingley Road/Long Lane, Heaton	18	17	14	1	3
NW20/H: Former Reservoir and Derelict Pumping Station, Carlisle Road	4	4	2	0	2
NW21/H: Whetley Mills	2	2	1	0	1
NW22/H: Alton Grove, Frizinghall	1	1	0	0	1
NW23/H: Church Street, Manningham	2	2	1	0	1
NW24/H: Rayner Mount Allerton	1	1	0	0	1
NW25/H: Former Nightclub and Operational Stone Yard, Belvedere Terrace	1	1	0	0	1
NW26/H: Former Storage Yard, Thornton Road, Fairweather Green	1	1	0	0	1
NW27/H: 74 Frizinghall Road	3	3	1	1	1
NW28/H: Patent Street, Manningham	3	3	2	0	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW29/H: Chapel Lane, Allerton	1	1	0	0	1
NW30/H: 7-9 Oak Avenue	2	2	0	1	1
NW31/H: Former Manningham Middle & Primary Schools, Manningham Lane	2	2	1	0	1
NW32/H: Allerton Mills	2	2	1	0	1
NW33/H: Site of Anvil Court, Church Street, Manningham	2	2	0	1	1
NW34/H: Lister Mill & Surrounds	2	2	1	0	1
NW35/H: 29 Springfield Place	1	1	0	0	1
NW36/H: Heaton Mount	2	2	1	0	1
Totals	**136**	**131**	**70**	**23**	**43**

Table Error! No text of specified style in document..**7: Summary of Representations Received - Bradford North West Proposed Sites (NW1/H to NW36/H)**

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW1/HC: Snowden Street	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H687 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comments:
1. Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation ID: 28841

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW2/H: Drummond Trading Estate, Lumb Lane	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on heritage assets • Flooding/drainage – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H781 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. **Proximity to/impact on heritage assets:** • An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building. • Development could harm elements that contribute to the significance of the listed building. • The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.
Support:
No representations received in support
Comments:
1. Flooding/drainage: • The site located in Flood Zone 1 (FZ1).

- Guidance provided on appropriate flood mitigation measure and surface water discharge rates.

Representation IDs: 28842, 29255

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW3/HC - Spring Bank Place	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H788 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comments:
1. Flood risk/drainage: • Site located within Flood Zone 1 (FZ1). • Guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required.

Representation ID: 28843

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW4/H: Mansfield Road	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on historic environment • Flood risk and drainage – flood zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H792) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Summary of Representations
Objections:
1. Impact on the historic environment: • The site is entirely within the St Paul's Conservation Area and close to the Registered Lister Park and to its Grade II listed lodge and gates. • The Conservation Area Appraisal identifies the majority of the site as providing a negative contribution to the character of the conservation area. The exception is the building at the southwest corner of Mansfield Road and Back Lindam Terrace which is identified as making a positive contribution to the area. • The development consideration for this should add the following to the development consideration to the site proforma: *'Retain and convert those buildings and structures which make a positive contribution to the Conservation Area'.*
Support:
No representations received in support
Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation ID: 28844, 29257

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW5/H: St Marys Road	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on heritage assets • Flood risk/drainage – flood risk 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H793 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. Proximity to/impact on heritage assets:

- Listed building located within the vicinity of the site.
- An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building.
- Development could harm elements that contribute to the significance of the listed building.
- The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

Support:

No representations received in support.

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation ID: 28845, 29258

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW6/H: Derelict mill and single storey industrial buildings, Priestman Street	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H794 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
2. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation ID: 28846

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW7/H: Acacia Drive, Sandy Lane	18	18	15	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Setting of the site • Site access • Presence of key infrastructure • Flood risk/drainage • Impact on heritage assets • Impact on local infrastructure • Impact on existing uses • Support for site allocation • Proximity to grid assets	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H795 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Development on Green Belt/greenfield land: 1. Objection to the use of Green Belt/greenfield sites for development, when all options for new housing in inner town/city areas had not been exhausted. 2. Green belt land should be preserved and improved to provide biodiversity for diverse habitats and wildlife (hare, deer, bats, birds, pheasants, door mice). 3. Would be contrary to current thinking and policy on climate change, preserving the environment, nature and wellbeing. Government policy is to protect Green Belt land to prevent urban sprawl. 4. Development of site would increase air pollution

5. Would set precedence for the future.

2. Setting of the site:

- The site's parkland setting is not suitable for development at sufficient density to constitute sustainable development and should not be allocated.

3. Site access:

- Only one exit from Acacia Drive
- Congestion issues on Cottingley Moor Road which will be exacerbated by development.
- Site is not sustainable in transport policy terms with excessive distance from bus stops.

4. Presence of key infrastructure:

- Electricity pylons and high voltage cables run across the site.

5. Flood risk/drainage:

- The site has numerous natural springs and part of the site regularly floods.

6. Impact on heritage assets:

- Concerns raised about the impact on listed buildings in the vicinity.

7. Impact on local infrastructure/services:

- Serious consideration needed to be given to the ability of local infrastructure and services to support development including capacity of doctor's surgeries, schools, shops and the highway network.

8. Impact on existing uses:

- Site is used by an established large horse riding school and grazing.

Support:

1. Site allocation:

- Support for the site allocation.
- Site is capable of supporting relevant elements of the Local Area Strategy, including new quality housing, new and enhanced open spaces, support for the vitality and viability of the Allerton Local centre and other local services, and integrated safe active travel routes (cycling and walking) through neighbourhoods.
- The development considerations contained in the individual Site Details are achievable.
- There are no known viability issues.

• There are no environmental constraints associated with the site that cannot be dealt with via appropriate design.
Comment:
1. Proximity to Grid assets: • The site is crossed or is in close proximity to National Grid assets. • Plans and guidance on developments near National Grid assets was provided.
2. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 216, 264, 321, 569, 794, 1411,1666, 1996,2578,3337, 3552,3739, 3953, 5462, 5784, 27745, 28847, 30111

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW8/H: High Ash Farm, Allerton Road, Allerton	9	9	4	4	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Setting of the site • Impact on local wildlife • Impact on agriculture • Flood risk/drainage • Impact on highway network • Support for site allocation	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H796 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Development on Green Belt/greenfield land:**
   - Objection to the use of Green Belt for development.
   - Instead site should be used to enhance biodiverse habitats.
   - Contrary to Government policy (NFFF) to protect Green Belt land.

2. **Setting of the site:**
   - The site's parkland setting is not suitable for development at sufficient density to constitute sustainable development and should not be allocated.

3. **Impact on local wildlife:**
   - Concerns about the loss of habitats for wildlife.
   - Wildlife in the surrounding areas has already been significantly affected by housing developments on Allerton Lane over the past few years.

4. Impact on agriculture: • Development would end any potential agricultural improvements and jobs that would be provided.
5. Flood risk/drainage: • The land regularly floods as it acts as run off for rain from higher ground. • New homes will be susceptible to flooding and will be adversely affected.
6. Impact on highway network: • Concerns that the local infrastructure cannot cope with existing traffic. • Congestion will increase and this is at odds with the zero carbon future.
Support:
1. Site allocation: • Support for site allocation. • It was confirmation that the site is available and deliverable. • Confirmation provided that landscaping will be incorporated into the design of any scheme to create a stronger boundary to the green belt.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 217, 4955, 5785, 7131, 8137, 17018, 25321, 27966, 28848

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW9/H: Wilsden Road/West Avenue, Sandy Lane	12	11	7	3	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Setting of the site • Impact on local infrastructure • Impact on agriculture • Flood risk/drainage • Impact on highway network • Impact on local heritage assets • Support site allocation • Agreement with Green Belt Assessment	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H797 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Development on Green Belt/greenfield land:**
   - Objection to the use of Green Belt for development.
   - Erosion of character and views of the area.
   - Instead site should be used to enhance biodiverse habitats and maintain a corridor for wildlife.
   - Contrary to current thinking and policy on zero carbon and sustainable development. It would lead to a car dependant community as there are limited local amenities such as local shops.
   - Contrary to Government policy (NFFF) to protect Green Belt land which should only be considered in special circumstances.
   - Would set precedence for the future.

2. Setting of the site:

- The site's parkland setting is not suitable for development at sufficient density to constitute sustainable development and should not be allocated.

7. Impact on local infrastructure/services:

- Local infrastructure would not support this development and it would increase existing pressures.
- Schools are oversubscribed, and there are no doctors.

8. Impact on agriculture:

- Would lead to the loss of agricultural land.

9. Flood risk/drainage:

- The land regularly floods as it acts as run off for rain from higher ground.
- New homes will be susceptible to flooding and will be adversely affected.

10. Impact on highway network:

- Highways limitations are an imperative objection and further development would exacerbate problems.
- Congestion will increase which is at odds with zero carbon future.

11. Impact on local heritage assets:

- Proximity to heritage asset within vicinity of the site.
- An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building.
- Development could harm elements that contribute to the significance of the listed building.
- The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

Support:

1. Site allocation:

- Support for site allocation.
- Confirmation that the site is available.

• Confirmation that the site is deliverable and unconstrained and capable of delivering housing in the short term to contribute to the housing requirement.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Green Belt Assessment: • Agreement with the outcome of the Green Belt Assessment.

Representation ID: 218, 699 ,1417 ,3742, 5787, 7132, 8138, 17029, 28236, 28238, 28849, 29260

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW10/H: Allerton Road, Prune Park Lane	19	19	8	10	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Setting of the site • Impact on local infrastructure • Impact on agriculture • Flood risk/drainage • Impact on highway network • Impact on local heritage assets • Site allocation support and objections • Site access	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H772 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site allocation • Objection to the site allocation.
2. Development on Green Belt/greenfield land: • Objection to the use of Green Belt for development. • It prevents Allerton and Sandy Lane from being one entity / merging. • Brownfield sites should be maximised more aggressively in Bradford. • Erosion of character and views of the area. • It should be should be preserved to promote clean air and support mental health and wellbeing. • No evidence of any special circumstances exist to justify the development.

3. Impact on the setting of the site: • Impact on the open space which is a key characteristic of Allerton. • The site's parkland setting is not suitable for development at sufficient density to constitute sustainable development and should not be allocated.
4. Impact on local infrastructure/services: • Local infrastructure would not support this development and it would increase existing pressures on local schools and GP practices.
5. Impact on wildlife: • Concerns raised about the wildlife of the surrounding area has already significantly been negatively affected by housing development on Allerton Lane in the past few years.
6. Flood risk/drainage: • Concerns regarding flooding risk and surface water flooding which would be exacerbated by further development.
7. Impact on highway network: • Concerns raised about existing traffic on congested roads and the highway limitations.
8. Impact on local heritage assets: • Proximity to heritage asset within vicinity of the site. • An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building. • Development could harm elements that contribute to the significance of the listed building. • The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.
Support:
1. Site allocation: • Support for site allocation. • Confirmation that the site is available and deliverable. • Site capable of delivering a range of housing types within first 5 years of the plan.
2. Visual appearance of the site:

- It was noted that the site is very unsightly in its present state development would improve the visual appearance of the area.

3. Site access:

- Access to the site is excellent as it is off a main road.
- There is adequate space to improve the road infrastructure if needed for example a roundabout.
- There are not many homes which would be affected by the land been developed.
- The site has excellent transport links as it is on a busy bus route to Bingley and Bradford

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 219, 700, 1240, 1241, 1245, 1414, 3744, 4956, 8139, 13364, 17028, 18925, 18935, 18945, 18955, 27956, 28304, 28850, 29262

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW11/H: North Parade, Allerton	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local infrastructure • Impact on highway network • Proximity to landfill site/quarry • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H773 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Impact on local infrastructure/services: • Local infrastructure would not support this development and it would increase existing pressures on existing services and facilities.
2. Impact on highway network: • Concerns raised about existing levels of traffic within/through the Parish of Sandy Lane.
3. Proximity to landfill site / quarry: • Concerns raised about the close proximity to Chellow Dene and to a former land fill site and quarry.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 3746, 28851

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW12/H: Lynfield Drive, Daisy Hill	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage – flood zone 1	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis**. The site remains a housing allocation and is identified as H774 in the Regulation 19 Local Plan**. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation ID: 28852

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW13/H: Millmoor Close	6	4	3	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on openness/setting of site • Green Belt assessment • Alternative site suggestion	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. **The site remains a housing allocation and is identified as H775 in the Regulation 19 Local Plan**. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Impact on the openness / setting of the site:**
   - Small pockets of open space within densely populated areas must be preserved for people's health and wellbeing.
   - The site's parkland setting that is not suitable for development at sufficient density to constitute sustainable development and should not be allocated.
2. **Green Belt Assessment:**
   - Disagreement with the Green Belt Assessment.
   - The site is considered to make a very limited contribution to the green belt purposes.
   - There is no strong defensible boundary between the existing built up areas therefore development would not harm the role of the wider green belt and a new defensible boundary could be formed along the western edge of the site.
3. **Alternative site suggestion:**
   - It was put forward that land to the south west of the site could also be released from the green belt and be brought forward for housing (rejected site NW/31A).

Support:

1. Site allocation: • Support for site allocation.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Highways Assessment: • A highways assessment has been provided which demonstrates that safe and satisfactory vehicular and pedestrian /cycle access can be provided within the site.
3. Highway design and site access: • In accordance with national policy and the Leeds Council's Street Design Guidance which is utilised by Bradford Council, the assessment shows that it is not necessary to provide two points of access above 200 dwellings Bootham Park/Sowden Road corridor can safely and satisfactory accommodate at least up to the 300 dwelling threshold, which the Council suggest is the figure above which a second point of access "must" be required. • On this basis, and deducting the existing 128 properties, it is concluded that up to 172 additional dwellings could be accommodated off Millmoor Close. Deducting the 58 dwellings which are proposed to be allocated at site NW13/H and the 12 dwellings at site NW12/H therefore leaves sufficient capacity in the local highway network for 102 dwellings to be developed at rejected site NW/031A and served via Millmoor Close.

Representation ID: 221, 8140, 27107, 27108, 27109, 28853

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW14/H: Chellow Lane	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H702 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
2. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation ID: 28854

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW15/H: Former Merrivale Arms Public House and Surrounds, Merrivale Road, Allerton	4	3	3	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on wildlife • Impact on green spaces • Impact on local infrastructure • Flood risk/drainage • Impact on heritage assets	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H776 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Impact on wildlife: • Concerns raised about the ecological impact on wildlife and protected species i.e hedgehogs.
2. Impact on green spaces: • There is already a lack of green spaces within the area.
3. Impact on local infrastructure / services: • Area has outdated infrastructure including oversubscribed schools.
4. Flood risk / drainage: • Site contains underground springs which could cause flooding.
5. Impact on heritage assets: • The western edge of the site is close to the Grade II listed Dean House. Two further listed buildings are to the north-west of the site.

- Development of this area could harm elements which contribute to the significance of this heritage asset. If allocated, the plan the development consideration for this should add the following to the development consideration to the site proforma:

  'Development should conserve and, where possible, enhance those elements which contribute to the significance of heritage assets in the vicinity of the site'.

Support:

No representations received in support.

Comment:

3. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 734, 1138, 28855, 29269

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW16/H: Allerton Lane/Chevet Mount (1)	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage – flood zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as **H1562**) is not carried forward as a preferred option and **excluded / rejected.** • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA). • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28856

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW17/H: Allerton Lane/Chevet Mount (2)	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage – flood zone 1	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1562) is not carried forward as a preferred option and excluded / rejected. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA). • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation ID: 28857

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW18/H: Haworth Road, Playing fields, Heaton	3	3	1	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Preserve site for recreation • Flood risk/drainage • Consideration of previous masterplans	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. **The site remains a housing allocation and is identified as H779 in the Regulation 19 Local Plan**. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Preserve site for recreation:**
   - The site is a playing field which should be preserved for the use of the local community and invested in so not to be underused.

Support:

No representations received in support.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. **Consideration of previous masterplans:**
   - Consideration should be given to previous masterplan details for this area of Heaton along with the reinstate the allotments off Aygill Avenue.

Representation ID: 222, 20064, 28858

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW19/H: Bingley Road/Long Lane, Heaton	18	17	14	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation • Development of Green Belt/greenfield site • Outcome of Green Belt Assessment • Impact on wildlife • Impact on setting of site • Loss of sport and recreation provision • Impact on local infrastructure • Flood risk/drainage • Impact on highway network • Impact and proximity to ancient woodland • Cumulative impacts of development • Impact on local heritage assets • Site boundary • Support for site allocation	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H780 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site allocation: • Objections to the site allocation.
2. Development on Green Belt/greenfield land: • Objection to the use of Green Belt for development.

- Should be protected in accordance with the NPPF.
- Use of the site would destroy the natural beauty of the countryside.
- Brownfield sites should be maximised first.

3. Outcome of the Green Belt Assessment:

- The outcome of the site being 'moderate' performing green belt parcel and development would result in major impact on the fundamental aim and essential characteristics of green belt in this location, is considered to be overstated.
- It is argued that the site adjoins an existing built up area to the east and is close to a range of uses and, although the site largely lacks built form, the topography and tree cover mean it is not particularly visible or prominent.
- The land is contained by physical boundaries to the north and east and will be largely self-contained.
- Considered that strong new Green Belt boundaries can be formed to prevent further development or sprawl, and this would continue to be the case should the additional land identified be included as part of a future allocation.

4. Impact on wildlife:

- Concerns about the impact of development on local wildlife (foxes, deer, birds).

5. Loss of sport and recreation provision:

- The site is in use as a golf course / driving range which is an asset to the area, providing and encouraging (affordable) exercise and creates health and wellbeing opportunities for the community.

6. Impact on the setting of the site:

- The site's parkland setting is not suitable for development at sufficient density to constitute sustainable development and should not be allocated.

7. Impact on local highway network:

- Concerns about extra traffic on Bingley Road and Long Lane along with the associates issues of air pollution.
- Concerns raised about the impact of additional traffic from the proposed new crematorium.
- The site is not within 400m of a high frequency bus route.

8. Impact on local infrastructure / services:

- Lack of provision of local school places in both primary and secondary schools.
- Lack of GPs, dentists and local shops.

9. Impact on ancient woodland:

- Site could have potentially adverse impacts on areas of ancient woodland within and/or adjacent to site allocations.
- Ancient woodlands should not be included in areas that are allocated for development as this leaves them open to the impact of development.

10. Cumulative impact of developments:

- The cumulative impact of current developments alongside the proposed allocations should be considered.

11. Impact on local heritage assets:

- Proximity to heritage asset within vicinity of the site.
- An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building.
- Development could harm elements that contribute to the significance of the listed building.
- The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

Support:

1. Site allocation:

- Support for site allocation.
- Site is in a sustainable location with easy access to a good range of local services and public transport services.

2. Site boundary:

- Suggested that the proposed site is extended to the north east and south west of the site and west of Shay Lane.

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

2. Proximity to ancient woodlands:

- The site lies immediately adjacent to Heaton Woods, Northcliffe Woods and Old Spring Wood Local Wildlife Site and ancient woodland (irreplaceable habitat).

- Any proposals should avoid any direct or indirect impacts and work to retain, enhance and improve connectivity between these areas of woodland. Paragraph 175 of the NPPF sets out a presumption against development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland or veteran trees).

Representation ID: 223, 237, 624, 2130, 3315, 3966, 4070, 4940, 5952, 7030, 8141, 11587, 13462, 19915, 27093, 27094, 28859, 29271

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW20/H: Former Reservoir and Derelict Pumping Station, Carlisle Road	4	4	2	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site access • Impact on local highway network • Impact and proximity to local heritage assets • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H782 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site access: • Concern about site access
2. Impact on local highway network: • Concerns raised about the impact of additional traffic in the local area. • Concerns about highway safety
3. Impact on local heritage assets: • Proximity to heritage asset within vicinity of the site. • An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building. • Development could harm elements that contribute to the significance of the listed building.

• The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Proximity to heritage asset: • It is noted that there is a distinctive listed building on this site which should be incorporated.

Representation IDs: 263, 3725, 28860, 29274

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW21/H: Whetley Mills	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local heritage assets • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H783 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. Impact on local heritage assets:

- Historic England would concur with this analysis and with the assessment of the degree of harm that the development of this site would be likely to cause.
- The mitigation measures which have been put forward in the Heritage Impact Assessment are endorsed and these are likely to be effective in reducing the harm to the level indicated.
- The HIA could provide further guidance regarding the form of development that might be appropriate in the Amber shaded area. However, in order to reduce the potential harm to that level, the mitigation measures which the Heritage Impact Assessment has put forward need to be implemented as part of any future development proposal for this area.
- As currently worded, the development considerations for this site do not adequately reflect the mitigation measures set out in the Heritage Impact Assessment. Therefore, an additional development consideration is necessary to tie the mitigation measures set out in the HIA into the Plan. Add an additional bullet point under the sites development considerations to read:

''Development proposals should implement the recommendations set out in the Heritage Impact Assessment, or other suitable mitigation measures agreed by the Local Planning Authority to avoid or minimise harm to the significance of heritage assets and their settings.'
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28861, 29281

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW22/H: Alton Grove, Frizinghall	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H719 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28862

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW23/H: Church Street, Manningham	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local heritage assets • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H725 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Impact on local heritage assets:**
   - Proximity to heritage asset within vicinity of the site.
   - An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building.
   - Development could harm elements that contribute to the significance of the listed building.
   - The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

Support:

No representations received in support.

Comment:

1. **Flood risk/drainage:**

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28863, 29282

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW24/H: Rayner Mount Allerton	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H784 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
2. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28864

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW25/H: Former Nightclub and Operational Stone Yard, Belvedere Terrace	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H785 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28865

NW26/H - Former Storage Yard, Thornton Road, Fairweather Green

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW26/H: Former Storage Yard, Thornton Road, Fairweather Green	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H733 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation ID: 28866

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW27/H: 74 Frizinghall Road	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Nature of the site • Impact on local highway • Proximity to heritage assets • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H786 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Nature of the site:**
   - Tress present on site.
   - Site is an awkward shape with an embankment of approximately 15 meters' elevation supporting neighbouring dwellings.
2. **Impact on local highway**
   - Located on a main road with traffic calming measures
   - Located next to a very busy Bradford Grammar School and train station.

Support:

1. **Proximity to heritage assets:**
   - Welcome the inclusion of reference to the proximity of these heritage assets as a constraint in the site proforma and that development considerations highlighted that the design and layout of development should seek to protect the setting of these heritage assets.
   - This will alert developers to the need to take account of those elements which contribute to their significance and ensure that they are not harmed.

Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Proximity to heritage asset: • Welcome inclusion of reference to proximity to heritage asset as a constraint in the site proforma and that development considerations highlighted that the design and layout of development should seek to protect the setting of these heritage assets. • This will alert developers to the need to take account of those elements which contribute to their significance and ensure that they are not harmed.

Representation IDs: 28867, 29140, 29283

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW28/H: Patent Street, Manningham	3	3	2	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on heritage assets • Impact on greenspace • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H787 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Impact on local heritage assets:**
   - Proximity to heritage asset within vicinity of the site.
   - An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building.
   - Development could harm elements that contribute to the significance of the listed building.
   - The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

2. **Impact on greenspace:**
   - The site has open greenspace, public paths and the greenery compliments Listers Mill. Greenspace should be incorporated for any future residents.

Support:

No representations received in support.

Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28868, 29141, 29284

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW29/H: Chapel Lane, Allerton	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H738 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
3. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28869

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW30/H: 7-9 Oak Avenue	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local heritage assets • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H740 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

No representations received in objection.

Support:

1. **Impact on heritage assets:**
   - The site is within St Paul Conservation Area and 80 metres to the south-west of Oakhurst, a Grade II Listed Building.
   - The Conservation Area is included on the Heritage at Risk register.
   - The development of this area could harm elements which contribute to the significance of these designated heritage assets.
   - Historic England welcome the inclusion of a reference to the proximity of these designated heritage assets as a constraint in the sites pro forma, and that the Development Considerations highlight that the design and layout of development should ensure that any impacts on these heritage assets are avoided or mitigated. This will alert potential developers of the need to take account of those elements which contribute to their significance, and ensure that they are not harmed by development proposals.

Comment:

1. **Flood risk/drainage:**

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28870, 29285

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW31/H: Former Manningham Middle & Primary Schools, Manningham Lane	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local heritage assets • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H749 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Impact on heritage assets:**
   - Proximity to heritage asset within vicinity of the site.
   - An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building.
   - Development could harm elements that contribute to the significance of the listed building.
   - The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

Support:

No representations received in support.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28871, 29286

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW32/H: Allerton Mills	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local heritage assets • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H789 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Impact on heritage assets:**
   - Proximity to heritage asset within vicinity of the site.
   - An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building.
   - Development could harm elements that contribute to the significance of the listed building.
   - The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

Support:

No representations received in support.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28872, 29287

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW33/H: Site of Anvil Court, Church Street, Manningham	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local heritage assets • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H751 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

No representations received in objection.

Support:

1. **Impact on heritage assets:**
   - The site is located opposite a Grade II listed terrace along Church Street to the north of the site.
   - The development of this area could harm elements which contribute to the significance of these designated heritage assets.
   - Historic England welcome the inclusion of a reference to the proximity of these designated heritage assets as a Constraint in the sites pro forma, and that the Development Considerations highlight that the design and layout of development should ensure that any impacts on these heritage assets are avoided or mitigated.
   - This will alert potential developers of the need to take account of those elements which contribute to their significance, and ensure that they are not harmed by development proposals.

Comment:

1. **Flood risk/drainage:**

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28873, 29288

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW34/H: Lister Mill & Surrounds	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local heritage assets • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H790 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Impact on heritage assets:**
   - Proximity to heritage asset within vicinity of the site.
   - An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building.
   - Development could harm elements that contribute to the significance of the listed building.
   - The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

Support:

No representations received in support.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28874, 29289

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW35/H: 29 Springfield Place	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H791 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28875

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
NW36/H: Heaton Mount	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local heritage assets • Flood risk/drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H754 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Impact on heritage assets:**
   - Proximity to heritage asset within vicinity of the site.
   - An assessment should be undertaken to determine the contribution the sites makes to those elements which contribute to the significance of the listed building.
   - Development could harm elements that contribute to the significance of the listed building.
   - The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.

Support:

No representations received in support.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28876, 29290

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 93 within the consultation document.

Summary of Consultation

A total of **11** representations were received in relation to Question 93 from **8** respondents. Respondents included Highways England, local residents, and a house builder. **Table Error***! No text of specified style in document.* (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 74.9**.

Table Error! No text of specified style in document.**: Overview of Representations Received – Consultation Question 93: Bradford North West Preferred Site Allocations**

Consultation Question	Number of Representations	Number of Respondents	Object	Support	Comment
Q93	11	8	10	0	1

Table 74.9: Summary of Representations Received – Q93: Bradford North West Preferred Site Allocations

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Suggested amendment to proposed site: NW13/H - Millmoor Close • Objections to rejected sites • Alternative sites • Impact on highway network • Impact on wildlife	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. .

Summary of Representations

Objections

1. **Development of Green Belt land:**
   - The use of suitable brownfield sites should be maximised before considering changes to Green Belt boundaries. It was viewed that there is a plentiful supply of brownfield that had not been developed.
   - Green belt sites should be removed from the plan.

2. **Suggested amendment to proposed site:**
   - **NW13/H - Millmoor Close**
     - The proposed allocation is supported, however it is considered appropriate to also extend allocation to include land south west of site NW/031A which is capable of accommodating 100 dwellings. The site can be accessed via Millmoor Close.
     - Disagree with Council's assessment that only 200 dwellings can be taken from Milmoor Close and that a second access would be required.

3. **Objections to rejected sites:**
   - **Hazel Walk, Daisy Hill (SLA reference NW/031A)**
     - To be considered when adjacent site has been allocated
   - **SLA reference NW/128**
     - Argued that the site is not within a conservation area, does not have any TPOs and is situated within a residential area.
   - **Land at Haworth Road, Sandy Lane (SLA site reference NW/020)**
     - Represents a suitable, sustainable and deliverable location to meet the districts housing need.
   - **SLA site reference NW/024 (other than that which is allocated under NW10/H).**
     - The full extent of the site is sustainable, suitable (subject to allocation) and deliverable.
     - It is not rejected in the Strategic Land Assessment.
     - Masterplans provided illustrate how site could be delivered.
     - Reference is also made to the Green Belt Assessment – disagree with the overall conclusion that the site has 'major' potential impact on the green belt and consider this should be reduced to 'moderate'.
   - **SLA site reference NW/033**.
     - There are few other potential housing allocations that benefit from the defendable boundaries and sustainability credentials of the Allerton Road site.

○ Green Belt Assessment – development would not result in unrestricted urban sprawl; the site is physically contained to the north by Chellow Dene and residential developments to the north, east and southern edges. There would be no detrimental effects on the setting and special character of historic features.
4. Additional/Alternative site: • Proposed two additional areas are added to NW19/H to provide an additional 6-7ha.
Support
No representations received in support.
Comments
1. Impact on the highway network: • Development in Bradford North West would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

Representation IDs: 503, 1207, 5882, 11035, 15440, 27110, 28305, 28306, 28384, 28466, 28467

2.75 CANAL ROAD CORRIDOR

Introduction

The Local Plan settlement hierarchy identifies the Canal Road Corridor as within the Regional City of Bradford which is the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the District. There is a key focus on transforming its economic, environmental, physical and social conditions to support its long term regeneration. The CRC is also identified by the Local Enterprise Partnership as a Spatial Priory Area (SPA) Investment Location– an area where future housing and employment development should be encouraged. There is one designated employment area within the CRC the Canal Road Employment Zone situated around Hillam Road and alongside Canal Road South of Queens Road, but there are no specific employment land allocations. Under Policy SP6 the Plan will continue to support economic growth and investment. It is proposed that a minimum requirement of 1,750 dwellings will be delivered in CRC during the plan period. These will be delivered through a mix of committed sites (those under construction or have planning permission but have not yet commenced) and 8 allocated sites.

Portrait & Local Area Strategy

The Local Plan provides a Local Area Strategy for the Canal Road Corridor setting out the key elements to detail how the area will encourage and support investments and developments in the years to come. This was listed as question 94 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of 4 representations were received in relation to the Canal Road Corridor portrait and Local Area Strategy (Question 94) from **4** respondents. Respondents included local residents, Bradford Shipley Travel Alliance and Highways England. **Table 2.75.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 2.75.2**.

Table 2.75.1: Consultation Question 94: Canal Road Corridor Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
94	Canal Road Corridor Portrait & Local Area Strategy	4	4	2	1	1
	Totals	**4**	**4**	**2**	**1**	**1**

Table 2.75.2: Consultation Question 94: Canal Road Corridor Portrait & Local Area Strategy - Summary of Representations Received

Consultation Question 94 – Canal Road Corridor Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
94	Canal Road Corridor Portrait & Local Area Strategy	4	4	2	1	1

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Public transport matters not explained • Greenway matters not fully explained • Open space not fully explained • Mitigation measures of development to be justified • Inconsistent policy approach • Support for cycling and walking routes • Support for Bradford Beck Habitats Corridor • Impact on highway network	• This settlement area has been mostly amalgamated into the settlement areas Shipley and Bradford North East. • The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policies SP1: Shipley and BNE1: Bradford North East, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. Public Transport: • The Local Area Strategy includes matters regarding public transport Infrastructure which have not been fully explained or justified.
2. Greenway: • The Local Area Strategy includes matters regarding the description of the greenway which have not been fully explained or justified.
3. Open Space:

Summary of Representations
• The Local Area Strategy includes matters regarding open spaces which are undefined and have not been fully explained or justified.
4. Mitigation of Development: • Explain and justify how the impact of development will be mitigated on wildlife, flooding, public rights of way, woodland and the landscape.
5. Inconsistent Policy Approach: • There seem to be major contradictions between this local area plan and the Strategic and Thematic Policies on Climate Change, and Transport. • The Plan's strategic priorities should be defended against contrary measures in current plans, not tucked around them like fancy decoration around a poisoned chalice. • The two major housing developments must include the explicit consideration that they should be the council's favoured level of zero traffic.
6. Shipley Eastern Relief Road: • The Shipley Eastern Relief Road does not need to be protected, as less traffic will mean that 'in line' adjustments to the existing junctions will be sufficient to provide relief.
7. Carbon Emissions • The planning of Canal Road Corridor as imaginative net-zero carbon emission developments would support local, regional and national policy on climate emergency.
Support
1. Cycling and walking routes • Support for the enhancement and further development of cycling and walking routes.
2. Bradford Beck and Habitat Corridors • Support the restoration of Bradford Beck and the connections to high quality habitat corridors. This is critical for both people and wildlife and will enhance Bradford and Shipley through improved green and blue infrastructure, as well as air quality.
Comments
1. Impact on highway network: • Development within the Canal Road Corridor Area would not on its own have a severe impact on Strategic Road Network (SRN).

Summary of Representations
• The wider cumulative impact within the Canal Road Corridor Area and the rest of the development aspirations within the Plan could severely impact the SRN.

Representations IDs: 20, 5568, 5943, 15441

Sites

As highlighted above, eight sites were put forward in the Preferred Options document to meet the proposed development requirements for the Canal Road Corridor area. Under Q95 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **16** representations were received in relation to the housing sites proposed in the Canal Road Corridor from **15** respondents. Respondents included local residents, Highways England, the Environment Agency, Historic England and Natural England. **Table 2.75.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 752.75.4**.

Table 2.75.3: Canal Road Corridor Proposed Site (CR1/H – CR8/HC) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CR1/H - Bolton Road	2	2	0	0	2
CR2/H - Bolton Woods Quarry	2	2	1	0	1
CR3/H - Wapping Road, Bolton Road	2	2	1	0	1
CR4/H - North Queens Road	2	2	0	1	1
CR5/H - Frizinghall Road	2	2	0	1	1
CR6/H - North Bolton Hall Road	2	2	0	1	1
CR7/H - Thornhill Avenue	1	1	0	0	1
CR8/HC - New Bolton Woods	3	2	0	0	3
Totals	**16**	**15**	**2**	**3**	**11**

Table 752.75.4: Canal Road Corridor Proposed Site (CR1/H – CR8/HC) - Summary of Representations Received

CR1/H - Bolton Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CR1/H - Bolton Road	2	2	0	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Bradford Local Wildlife site • Flood risk and drainage	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H262 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations in objection received
Support:
No representations in support received
Comments:
1. Bradford Local Wildlife Site: • This site lies immediately adjacent to/on Boar's Well Urban Wildlife Reserve Local Wildlife Site which should be protected, retained, and enhanced as a result of development.
1. Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs : 11577, 28877

CR2/H - Bolton Woods Quarry

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CR2/H - Bolton Woods Quarry	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Important views for the Historic Park and Garden should be noted • Flood risk – flood zone 1	• Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant outline / full / hybrid planning permission.

Objections:

1. **Historic Park and Gardens:**

- Add the following additional Development Consideration to the site pro forma: 'This site lies on the opposite side of the valley to the Grade II Historic Park and Garden at Lister Park. Development proposals should have important views from this Registered landscape.' regard to the potential impact upon any important views from this Registered landscape.

Support:

No representations in support received

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1).
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs : 28878, 29294

CR3/H - Wapping Road, Bolton Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CR3/H - Wapping Road, Bolton Road	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Query over adjoining derelict school site • Flood risk - Flood zone 1	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. Part of the site remains a housing allocation and is identified as H256 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. Site NE5/H is adjoined by the derelict Wapping School. Why does the plan not provide for the school to be demolished and the site used for either amenity or an extension of housing site NE5/H. The school has been derelict for years and is an eyesore. Is the plan for it to remain an eyesore for the next 15 years?

Support:

No representations in support received

Comments:

1. Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs 28879, 30210

CR4/H - North Queens Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CR4/H - North Queens Road	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on conservation area and heritage assets • Flood risk – flood zone 1	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H263 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No representations in objection received

Support:

1. **Conservation and Heritage**
   - The site adjoins St Paul Conservation Area. The Conservation Area is included on the Heritage at Risk register. The development of this area could harm elements which contribute to the significance of this designated heritage asset. We welcome that the Development Considerations and Constraints & Opportunities identified for this site in the Draft Local Plan reflect those in the AAP.

Comments:

1. **Flood risk/drainage:**
   - The site is located in Flood Zone 1 (FZ1). Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28880, 29298

CR5/H - Frizinghall Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CR5/H - Frizinghall Road	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on heritage assets and need for a HIA • Flood risk – flood zone 1	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H264 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No representations in objection received

Support:

1. Conservation and Heritage

- The Black Swan Public House and Swan Hill, both Grade II Listed Building, are located 50 metres to the south-west of the site. The mill buildings currently occupying this site, dated 1915, are distinctive and characterful. The development of this area could harm elements which contribute to the significance of these designated heritage assets. We welcome that the Development Considerations and Constraints & Opportunities identified for this site in the Draft Local Plan reflect those in the AAP. However, if there have been any significant changes to the sites circumstances since its allocation in the AAP that we are not aware of (such as the lapsing of the previous planning permission), or the development proposed is significantly different (e.g. in terms of land use, density, scale, developable area etc.), the Council should undertake a Heritage Impact Assessment

Comments:

1. Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ1).

- Guidance provided on appropriate flood mitigation measure and surface water discharge rates that would be required.

Representation IDs: 28881, 29299

CR6/H - North Bolton Hall Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CR6/H - North Bolton Hall Road	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage - support for inclusion of developer considerations • Flood risk – flood zone 1	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H265 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No representations in objection received

Support:

1. Conservation and Heritage

- This site contains characteristic warehouse, mill and industrial buildings relating to the former Bolton Wood Shed (wool combing), now the Victor Works. The buildings are evident on the OS six-inch county series first revision published in 1895. We welcome the inclusion of the developer consideration for this site requiring that the potential for conversion of the existing mill buildings should be considered.

Comments:

1. Flood risk and drainage

- Site in Flood Zone 1 ONLY Mitigation should be set above the 1 in 100 plus cc level for the site as suitable for the proposed vulnerability classification (EA standing advice should cover this).

Representation IDs: 28882, 29300

CR7/H - Thornhill Avenue

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CR7/H - Thornhill Avenue	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk – flood zone 1	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H266 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations in objection received
Support:
No representations in support received
Comments:
1. Flood risk and drainage • Site in Flood Zone 1 ONLY Mitigation should be set above the 1 in 100 plus cc level for the site as suitable for the proposed vulnerability classification (EA standing advice should cover this).

Representation IDs: 28883

CR8/HC - New Bolton Woods

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CR8/HC - New Bolton Woods	3	2	0	0	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Agricultural land quality • Flood risk – flood zone 2 and 3 • Bradford Beck Water Course/Biodiversity Net Gain	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant outline / full / hybrid planning permission.

Objections:
No representations in objection received
Support:
No representations in support received
Comments:
1. Agricultural Land Quality • This allocated site may include land which may be best and most versatile agricultural land. The plan should safeguard the long term capability of such land (NPPF para 170). In order to inform the sustainability appraisal and ensure an accurate assessment of the impact of the plan on soil resources we recommend that allocations over 5ha, or at least those over 20ha, have ALC surveys undertaken in order to determine the ALC grade and help inform master planning and soil handling going forward.
2. Flood Risk/drainage

• Flood zones 2 & 3 (3a/3b). There should be no development in flood zone 3 unless considered water compatible or essential infrastructure. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development. • If the site is brownfield, there should be a 30% reduction in surface water discharge rates (additional comments made relating to detailed development design)
3. Bradford Beck Water Course/Biodiversity Net Gain • We note that the CR8/HC – New Bolton Woods site within the Housing Delivery and strategic Sites (HO1) layer, encompasses a significant length of Bradford Beck water course. We would like to flag the need for the existing water body to be protected and enhanced through any future development of this site. This would ideally include the creation of an undeveloped buffer zone. We would also like to highlight that Bradford Beck is confined to an open (and in parts closed) brick-lined culvert through much of this area. Significant ecological and geomorphological improvement opportunities (in line with the Humber River Basin Management Plan (RBMP) and Water Framework Directive (WFD) water body objectives) exist within this area, and improvement of the beck habitats could contribute significantly to Biodiversity Net Gain (including anticipated statutory 10% BNG requirement).

Representation IDs: 19913, 28886, 29259

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 95 within the consultation document.

Summary of Consultation

A single representation was received in relation to Question 95 from 1 respondents. The respondent was Highways England. **Table 2.75.5** (below) provides a breakdown of the representation by nature of response. The issues raised together with CBMDC's response are set out in **Error! Reference source not found.**.

Consultation Question 95 – Canal Road Corridor Preferred Site Allocations

Table 2.75.5: Consultation Question 95: Canal Road Corridor Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q95	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on the highway network	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

Summary of Representations
Objections
No representations in objection received
Support

Summary of Representations
No representations in support received
Comments
1. Impact on the highway network: • It is not considered that locating development within the settlements within the Canal Road Corridor Area, on their own, will have a severe impact on the capacity, operation and safety of the SRN, and this will be identified through the transport evidence base being prepared by the Council / the individual assessment of the transport implications of the sites by the sites' promoters. However, the quantum of sites forms part of a wider cumulative impact within the Canal Road Corridor Area and the rest of the development aspirations within the Plan could severely impact the SRN, and this cumulative impact will need to be established by the Council and considered by Highways England.

Representation IDs: 15442

2.76 SHIPLEY

Introduction

The Local Plan settlement hierarchy identifies Shipley as within the Regional City of Bradford which is the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the District. There is a key focus on transforming its economic, environmental, physical and social conditions to support its long term regeneration.

Portrait & Local Area Strategy

The Local Plan provides a Local Area Strategy for Shipley setting out the key elements to detail how the area will encourage and support investments and developments in the years to come. This was listed as question 96 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of 40 representations were received in relation to the Shipley portrait and Local Area Strategy (Question 96) from **35** respondents. Respondents included local residents, Bradford Shipley Travel Alliance and Highways England. **Table 2.76.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 2.76.2**.

Table 2.76.1: Consultation Questions 96: Shipley Portraits & Local Area Strategies - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
96	Shipley	40	35	35	2	3
	Totals	**40**	**35**	**35**	**2**	**3**

Table 2.76.2: Consultation Questions 96: Shipley Portrait & Local Area Strategy - Summary of Representations Received

Consultation Question 96 – Shipley Portrait & Local Area Strategy	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: **Objections** • Loss of Green Space/Green Belt • Impact on Local Infrastructure • Flood risk/drainage • Highway/Transport Issues • Impact on Health • Impact on Wildlife/Ecology • Environment; • Housing densities; • Affordable housing; • Transport schemes; • Office repurposing; • Green Infrastructure; • Cycle routes; • Empty buildings; • Open space; • Cartographical errors. • Support for the Shipley Portrait • Support for Dockfield Road • Support the enhancement of Heritage • Open Space • Highway Infrastructure	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy SP1: Shipley, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. Loss of Green Space/Green Belt • Green spaces are important. Green Belt should not be lost between Bingley and Shipley for houses- plenty of empty buildings in the area. • Exceptional circumstances have not been proven. • Loss of Green Belt would alter the character of the area. • The plan should not allow Green Belt sites/greenfield sites until all Brownfield sites are developed first. • The area is already deficient in terms of open space.
2. Impact on Local Infrastructure • Development would increase strain on local services such as buses, schools, dentists and GPs. • Train services are already overcrowded. • Plan needs to provide more clarification on how many new amenities are to be provided to support the number of homes proposed together with community led design improvements.
3. Flood risk/drainage • Loss of fields for development would impact on drainage and create flood risk for other residents in the area. • Proposed sites flood- they should be re-wilded and planted with trees to reduce flooding further down the valley. • Existing watercourses are already overloaded- additional tarmac/concrete would exacerbate this.
4. Highway/Transport Issues • More cars and pollution from proposed development in this area. Roads are already at gridlocked around Saltaire. • No development should be considered until the Shipley Eastern bypass is complete- roads and traffic volumes are at capacity particularly though Saltaire. Further objection to this scheme on the basis that all road building creates more road traffic and doesn't alleviate it.

Summary of Representations
• Lack of proposals for walking and cycling. To make a real impact the plan should make them a development requirement not just "encourage" developers to provide them. • Quiet roads would become dangerous for children and dog walkers if the level of homes proposed are developed.
5. Impact on Health • Air quality would be further reduced by road pollution. • Impact on mental health through loss of open space. • Increase in noise/visual impact on local footpaths. • Shortage of open space would have a detrimental effect on mental health.
6. Impact on Wildlife/Ecology • Effect on wildlife such as birds, mammals, otters, amphibians and invertebrates which are a food source- tawny owl has been seen locally and these are amber listed as under threat. • Trees with TPOs are an important asset for wildlife and should not be lost.
7. Other • The Council should be leading with environmentally sound solutions. • Housing densities on the identified sites should achieve at least 50 units to the hectare. • The Council should be providing affordable housing, not relying on developers. • The Valley Road widening scheme should be abandoned and the land used for homes. • Changes to working patterns since the pandemic would mean more office buildings can be repurposed- no need for more homes. • The Green Infrastructure Corridor does not include the land either side of Cottingley Cliffe Rd despite para 5.7.31 describing Nab Wood as an ecological asset. • Nab Wood cemetery should not be defined as Green Infrastructure- it does not serve as useable open space for residents. • Some sites are not served by public transport or cycle routes- a cycle route down Leeds Road to the railway station should be considered. • Carnegie Hall, Tax office, Shipley Hospital, Job centre, Land behind Aldi and former Hirst Wood nursery and other small sites should all be considered together with the numerous empty buildings in Shipley and Neighbouring areas. • The numbers of homes proposed on each site would mean no open space and private garden space.

Summary of Representations
• 1200 new homes can be developed on brownfield and other underutilised sites in the town centre without the need for Green Belt sites. • The Local Area Strategy Plan and Site Allocation Map for Shipley shows SH5/H washed over by Green Belt. This is clearly a cartographical error and should be corrected.
Support
1. Shipley Portrait • The reinforcement of Shipley town centre with enhancements and conservation of heritage. • Shipley is recognised in the settlement hierarchy as an area which can deliver homes, economic growth and sustainable transport improvements alongside environmental improvements.
2. Dockfield Road • Conditional support if local amenities are provided and there is no additional impact on local roads and biodiversity net gain.
3. Enhancement of Heritage • Support for focus on the conservation and enhancement of heritage assets in the portrait.
Comments
1. Open Space • Half of Northcliffe Woods is in Shipley- but no mention of it in the Plan. Much of the area is also a wildlife site.
2. Highway Infrastructure • On their own, the proposals would not have a severe impact on the Strategic Road Network (SRN) but the wider cumulative impact within the Bradford South East area and the rest of the development aspirations within the plan could severely impact the SRN. This cumulative impact would need to be established by the Council and considered by Highways England. • Impact of traffic from 1200 homes would increase air pollution. • Public transport limitations in some areas would increase reliance of the private car.

Representation IDs: 77, 350, 507, 817, 877, 878, 1187, 1287, 1633, 3306, 3419, 3832, 4080, 4196, 4398, 4601, 4762, 4907, 5150, 5519, 5810, 5920, 7142, 7210, 12077, 13714, 15443, 16556, 16732, 18168, 18745, 19799, 19813, 24691, 26641, 27467,27468, 27469, 28139, 29100

Sites

As highlighted above, twenty-two sites were put forward in the Preferred Options document to meet the proposed development requirements for the Shipley area. Under Q97 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of 1333 representations were received in relation to the housing sites proposed in Shipley from 1258 respondents. Respondents included local residents, site promoters, Highways England, Heritage England, The Canal and River Trust, the Environment Agency and Natural England. **Table 2.76.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 762.76.4**.

Table 2.76.3: Shipley Proposed Site (SH1/H – SH22/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH1/H - East Victoria Street	18	18	1	15	2
SH2/H - Carr Lane	9	9	6	2	1
SH3/H - Wycliffe Road	337	330	333	2	2
SH4/H - Glenview Drive, Bankfield Road, Nabwood	337	318	326	3	8
SH5/H - Bingley Road, Nabwood	292	261	273	16	3
SH6/H - Bankfield Farm, Nabwood	207	193	202	2	3
SH7/H - Queens Road/Ferncliffe Road, Saltaire	23	22	14	8	1
SH8/H - The Old School Building, Wrose Brow Road	3	3	0	1	2
SH9/H - Shipley Tax Office	21	20	3	15	3

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH10/H - Land to north and south of Dockfield Road	13	12	1	9	3
SH11/H - Land around Crag Road Flats	5	5	3	0	2
SH12/H - Crag Road	11	10	6	2	3
SH13/H - Regent House	7	7	0	6	1
SH14/H - Market Hall	8	8	0	7	1
SH15/H - Buildings along Briggate	11	11	2	7	2
SH16/H - Market Square	11	11	3	7	1
SH17/H - Shipley Gateway Site	6	6	0	4	2
SH19/H - Land between Leeds Road and Dock Lane	5	5	1	3	1
SH20/H - Station Road	4	4	0	3	1
SH21/H - Wrose Brow Road, Windhill	3	3	2	0	1
SH22/H - Browfoot/Wrose Brow Road	2	2	1	0	1
Totals	**1333**	**1258**	**1177**	**112**	**44**

Table 762.76.4: Shipley Proposed Sites (SH1/H – SH22/H) - Summary of Representations Received

SH1/H - East Victoria Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH1/H - East Victoria Street	18	18	1	15	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on designated heritage assets • Support the R**e**-use of derelict building; • Excellent transport links; • Near shops and services • Support environmental and heritage impacts • Canalside regeneration • Parking provision • Design • Avoid adverse loading onto the canal • Impact on designated heritage assets • Flood risk	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as H1044 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Impact on designated heritage assets • An assessment needs to be undertaken to determine the site's contribution to listed buildings in the locality including any impact the development might have on their significance.
Support:
1. Proposed site allocation • Development would support the re-use of a derelict building. • Transport links and walking and cycling routes are also excellent. • Site is well located near shops and services. • Environmental and heritage impacts would need to be considered.
2. Other • Site has potential to contribute to the wider regeneration of the canalside. • General support but development might not be feasible if parking is not provided. • Careful planning is required to ensure the development outside is attractive and a sensitive renovation.
Comments:
1. Impact on designated heritage assets • The site offers the opportunity to benefit the canal side and restore a heritage building to complement the World Heritage Site Buffer Zone. Parking areas should be sympathetically designed. Construction and post construction should avoid vibrations which could damage the canal. Wording should be added to development considerations *"The Development will need to be designed to minimise any adverse loading onto the canal*".
2. Flood risk • The site is flood zone 1- there should be a 30% reduction in surface water discharges for this site.

Representation IDs: 381, 1126, 1219, 1419, 2535, 2866, 3151, 4104, 4760, 4936, 5234, 5450, 5793, 5897, 5942, 13587, 28726, 29302

SH2/H - Carr Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH2/H - Carr Lane	9	9	6	2	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Property devaluation; • Density; • Environmental Impact Assessment needed; • Allocation is not sustainable • Impact on the highway network / highway safety • Impact on local infrastructure • Impact on designated heritage assets • Loss of green space • Loss of trees • Other sites available and more suitable • Public transport; eco friendly homes and active travel • Flood risk	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as H1011 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Proposed site allocation**
   - The development of the site would devalue adjacent property.
   - Number of units proposed is too high.
   - Environmental Impact Assessment has not been carried out.
   - Allocation of the site is not sustainable.

2. Impact on the highway network / highway safety • Increase in traffic on Carr Lane which is already busy. • Increase in noise from the road through added use.
3. Impact on local infrastructure • Access to schools and medical services is already poor in the area.
4. Impact on designated heritage assets • An assessment need to be undertaken to determine the contribution of the site to elements which contribute to the significance of listed buildings in the vicinity.
5. Loss of green space • Although overgrown the site is valued. • Loss of visual amenity.
6. Loss of trees • Site should be redrawn to avoid loss of mature trees.
7. Other • Other sites are available that are more suitable such as West Bowling.
Support:
1. Proposed site allocation • Site is well located close to public transport and could produce homes which could be eco-friendly. Active travel should be prioritised.
Comments:
1. Flood risk • The site located in Flood Zone 1 (FZ1). Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 858, 1220, 2592, 3016, 3156, 5241, 28728, 29303, 30236

SH3/H - Wycliffe Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH3/H - Wycliffe Road	337	330	333	2	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on residents – green space; • Brownfield rather than green field; • Query of need for more housing in Shipley; • Use of existing sites or empty properties – net zero commitment • Recommend that rebuild the existing flats at a higher density • Consistency / compliance with policy • Loss of open space • Impact on amenity • Site access • Impact on the highway network / highway safety • Impact on designated heritage assets • Impact on biodiversity/wildlife • Impact on local infrastructure • Land stability • Flood risk • Impact from construction • Increased pollution and effects on health • Environmental impacts and carbon footprint • Restrictive covenants • Building costs • Should be an asset of community value	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1057) is not all being carried forward as a preferred option and therefore is part rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B). The reduced part of the site carried forward as an allocation is now referenced as H1563 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

• Contravenes Bradford's Joint Health and Wellbeing Strategy • Lack of local housing • Opportunity for high quality and sustainable local homes • Easy access to local amenities and public transport • Available, • A suitable location • Free from constraints, • Deliverable within 5 years, • Single owner • Willing developer. • Open Space • Flood risk / drainage	

Objections:
1. Proposed site allocation • The low number of houses would have a huge impact on over 200 households who use the green space. • Brownfield sites should be a priority for development rather than this greenfield site. • Query whether there is a need for more housing for Shipley residents, or whether houses would be for those outside the Shipley area. • There is no need for more housing in the area. • The council should support housing development within existing sites or refurbishment of empty properties – Bradford Council has a commitment to net-zero carbon. • Recommend rebuilding the existing low-density flats using a higher-density layout.
2. Consistency / compliance with policy • Site is identified as Recreation Open Space in the RUDP and should therefore be protected from development. • Would contravene Core Strategy policy EN1 *"Land identified as recreation open space, or which is currently or was formerly used for recreation open space will be protected from development".*

- Government and local policies show that recreation open space like this is supposed to be protected.
- Object to the removal of open space designation.
- The Sustainability Appraisal for SH3 is vague, unbalanced, incomplete and is not substantiated with any reference to the Council's extensive documentation on the importance and protection of Open Space.
- Shipley is deficient in this type of open space and none of the exceptions for removing green space applies to this site or to a proposed development of it.
- Shipley is identified as being deficient in Open Space – proposed allocation would exacerbate this. Local Plan Policy states that open space should be increased.

3. Loss of open space

- Area is well used by local residents who do not have gardens. It is a place for children to play safely (as it is away from busy roads and overlooked by houses) and for people to exercise and walk dogs.
- Valued open space used by the whole community.
- One of the most used green spaces in the area.
- Only green space in a built-up and underprivileged / deprived area.
- Other parks / green spaces are a long way away involving main road crossings.
- Without local green spaces people would drive to open spaces, which would add yet more pollution to roads which are well-known for being some of the worst in the district.
- This is a safe open space – overlooked on four sides. Safety concerns of other open spaces (parks, river, canal, woods).
- Lack of safe play areas for children and young families as per Bradford Council's Early Years & Childcare Service.
- Benefits of this open space far outweighs the number of dwellings that could be built here.
- Green space provides benefits for mental & physical health and wellbeing, reduced violence and aggression, reduced health inequalities, increased community satisfaction, improved air quality and reduced noise pollution.
- It does not make sense to remove a well-used community green space to accommodate just 3.5% of the housing quota in the area.
- Open space should be improved rather than developed for housing.
- Should be designated as Local Green Space.

4. Impact on amenity

- Area contains a mix of unsightly properties – no more needed.

- The surrounding area is already overdeveloped.
- Site provides a visual amenity.
- More houses would cause an increase in air, light and noise pollution.
- Shipley has a problem with air pollution – development would add to the problem with increased emissions from more local traffic.
- Trees on this site help reduce pollution.
- Shipley is an area of concern due to elevated NO2 production – green spaces help remove air pollutants.
- Existing properties would suffer from loss of light, overlooking, loss of privacy.
- Loss of view.
- Would impact outlook.
- Vehicle access to new properties likely to be disruptive to existing properties given hilly nature of site.

5. Site access

- Access to the area from Saltaire Road and Kirkgate junctions are poor, particularly in winter conditions.
- The side road between the houses and the shops is very narrow.
- 44 dwellings is too many given the poor access roads.
- The roads are very narrow and steep in places, access and parking are already a problem.

6. Impact on the highway network / highway safety

- Local minor roads are used as a shortcut for people avoiding traffic and development would exacerbate this.
- There is already high traffic in the area and further housing would only add traffic to the area and increase pollution.
- Saltaire Road (A657) and Bingley Road (A650) are very congested and polluting roads, neither of which have capacity to accept further traffic.
- Wycliffe Road is already a very busy road and bus route frequently congested – likely to worsen with additional housing.
- More traffic would be hazardous to pedestrians including children.
- Loss of parking.
- No development should be permitted until the Shipley Eastern Bypass has been completed or other major infrastructure work completed to the junction of Saltaire Road(A657), Bingley Road (A650) and Moorhead Lane. The junction is operating over capacity and cannot take any more traffic.
- The surrounding minor road network is inadequate for this proposal.
- Site provides safe active travel routes away from congested roads which would be lost.

- Would lead to increased traffic on Kirkgate which is already highly congested and a bus route.

7. Impact on designated heritage assets

- Development would detract from the beautiful views of Salts Mill.
- Important views to World Heritage Site / Salts Mill would be lost.
- Too close to Saltaire World Heritage Site / within buffer zone.
- Visual impact on World Heritage Site.
- Historic England advised that before allocating this site for development:
    1. An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.
    2. If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.
    3. If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).

8. Impact on biodiversity/wildlife

- Provides an important safe habitat for local wildlife away from busy roads.
- Loss of habitat and food sources for bats, squirrels, birds (including owls), moths, butterflies, amphibians and reptiles.
- Loss of mature trees.
- An improvement to this site would be to allow it to develop as part of a green corridor.
- There has been no environmental impact assessment.

9. Impact on local infrastructure

- Local schools, GPs, and dentists are all at capacity / oversubscribed.
- Poor access to public transport (poor bus service) and local shops and services.
- Below-ground infrastructure at capacity (eg. Sewers).
- The infrastructure on Saltaire Road would be heavily impacted.

10. Land stability

- Site is a former quarry, not suitable for building.
- Land is steeply sloping which would reduce housing yield.
- No assessment into the viability of development on former infilled land (potentially contaminated/harmful landfill) has been made – possibility of gases.
- Underground spring present on site.
- Likely to be a highly varied bedrock profile and deep fill deposits resulting in high abnormal costs and practical difficulties of developing the site.
- Why have ground constraints been omitted from the screening?
- Query mining / subsidence.
- Site is full of cavities and the cellars from previously demolished houses which are full of rubble and live materials and would have to be made safe to build on.
- The land to the top of Elliott Street has a main sewer running through it.

11. Flood risk

- Development would take place on side of valley where extensive flooding has occurred in recent years.
- Increased risk of flooding due to hard landscaping and the removal of a natural soakaway.
- Flood risk would increase downhill from site, including World Heritage Site.
- How would development ensure that future surface water runoff is the same or lower than the current land use?

12. Impact from construction

- Construction would cause noise, disruption, and additional traffic in the local area.
- Harm to house prices.
- Local roads unsuited to heavy plant machinery.
- Construction equipment dangerous to children.
- Proximity of excavation work to properties to north.
- Noise pollution would increase stress / anxiety. Dust would exacerbate respiratory disease.

13. Other

- Increased pollution leads to increased respiratory diseases eg. COPD, asthma.

- Environmental impacts of developing this site and the carbon footprint.
- The deeds for Land Registry parcel WYK706967 (land on the Southeastern side of Wycliffe Gardens; land on the Eastern side of Wycliffe Road and land on the Eastern side of Thompson Street, Shipley) contain restrictive covenants related to the disposal of the land for non-exempt means. These non-exempt reasons include but are not limited to *"A disposal ... where the land is to be used as a public open space, woodland, play area, tree belt, recreation area ... or facility where it is to be used for any community benefit;".* No non-exempt reason is given for the building of private homes unless the homes are to be Social Housing.
- The cost of building the houses would far outweigh the value of the houses.
- Should be designated as an asset of community value.
- Contravenes part of Outcome 4 of Bradford's Joint Health and Wellbeing Strategy 2018-2023.

Support:

1. **Proposed site allocation**
   - Lack of local housing.
   - Site would provide the opportunity for high quality and sustainable homes for the local area.
   - Development would have easy access to an array of essential and non-essential amenities, alongside excellent public transport connectivity.
   - The site is available now, and is within a single ownership, offers a suitable location for development, is free from physical constraints and is therefore considered deliverable within 5 years. Willing developer.

Comments:

1. **Open Space:**
   - Would hate to see buildings on a lovely green site, but, unequivocally, people do not use the area.
2. **Flood risk / drainage**
   - Site is located within Flood Zone 1 (FZ1).
   - Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 82, 83, 84, 85, 86, 92, 93, 103, 111, 113, 124, 137, 138, 139, 140, 167, 210, 220, 225, 233, 240, 275, 279, 305, 327, 351, 415, 425, 433, 445, 446, 450, 451, 456, 464, 508, 509, 510, 511, 512, 515, 516, 518, 520, 521, 522, 523, 524, 526, 527, 530, 533, 534, 535, 536, 537, 538, 540, 546, 547, 548, 552, 555, 556, 557, 558, 563, 568, 579, 587, 600, 603, 607, 633, 634, 641, 649, 665, 696, 716, 776, 780, 807, 818, 839, 859, 870, 908, 922, 931, 954, 1084, 1085, 1097, 1101, 1121, 1150, 1198, 1260, 1268, 1270, 1276, 1277, 1288, 1297, 1312,

1322, 1323, 1324, 1325, 1326, 1327, 1330, 1331, 1332, 1337, 1338, 1346, 1376, 1379, 1383, 1384, 1406, 1418, 1422, 1425, 1433, 1435, 1443, 1455, 1463, 1478, 1480, 1502, 1560, 1665, 1687, 1693, 1713, 1748, 1757, 1857, 1866, 1900, 1944, 1946, 1993, 1995, 2003, 2024, 2036, 2059, 2068, 2099, 2116, 2142, 2155, 2178, 2213, 2285, 2291, 2311, 2354, 2375, 2390, 2414, 2437, 2440, 2447, 2457, 2481, 2509, 2528, 2570, 2571, 2588, 2593, 2652, 2681, 2698, 2708, 2733, 2813, 2868, 2871, 2890, 2898, 2948, 2993, 3064, 3072, 3078, 3102, 3142, 3161, 3170, 3176, 3210, 3215, 3238, 3402, 3558, 3592, 3802, 3812, 3828, 3990, 4028, 4032, 4034, 4053, 4151, 4167, 4298, 4345, 4373, 4410, 4423, 4471, 4547, 4557, 4582, 4723, 4752, 4763, 4764, 4770, 4819, 4842, 4855, 4857, 4858, 4899, 4902, 4965, 4976, 5071, 5085, 5088, 5124, 5126, 5128, 5285, 5343, 5351, 5406, 5419, 5443, 5500, 5524, 5532, 5715, 5717, 5772, 5779, 5781, 5807, 5846, 5867, 5934, 5941, 5947, 5948, 5995, 6021, 6083, 6160, 6326, 6332, 6938, 7011, 7086, 7346, 7399, 7453, 7821, 8012, 8065, 8103, 8113, 8623, 10227, 10542, 10679, 10951, 11283, 11329, 11363, 11386, 11548, 12078, 12092, 12463, 13715, 13717, 13720, 14084, 14497, 15223, 15290, 16246, 16274, 16377, 16743, 17262, 18273, 19205, 19528, 19800, 19814, 20004, 20080, 20696, 21114, 21385, 21429, 21775, 24057, 24194, 24283, 24488, 24598, 24599, 25277, 25313, 25455, 25697, 27780, 28559, 28585, 28586, 28729, 29305, 29494, 29589, 30232, 30241

SH4/H - Glenview Drive, Bankfield Road, Nabwood

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH4/H - Glenview Drive, Bankfield Road, Nabwood	337	318	326	3	8

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Housing need & green belt loss. • Affordable housing • Loss of woodland and fields • Housing density • Site topography and site access. • Boundary reduction • Site consideration • Suitable for high quality eco homes • Consistency / compliance with policy • Development on Green Belt land • Location of development • Site access • Impact on the highway network / highway safety • Flood risk / drainage • Impact on trees • Impact on biodiversity / wildlife • Impact on air quality • Impact on amenity • Impact on health • Impact on local infrastructure • Land stability	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1058) is not carried forward as a preferred option and rejected. • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

• Climate change / emergency • Landscape impacts • Impact on designated heritage assets • Loss of greenspace / open space • Impact on water quality. • Potential for criminal activity • Loss of agricultural land. • Refusal of previous planning applications. • Consultation during lockdown. • Loss of views. • Negative impact on house prices. • Impact on Public rights of way, (PROW). • Loss of local identity due to merging of settlements. • Affordable housing. • Local roads are unsuitable for construction traffic. • New development should be in Shipley town centre to help it's regeneration. • Impact of pandemic and Brexit on housing need. **Support** • More housing required for working people. • Boundary amendment to SW edge • Biodiversity • Flood risk • Landscape • Access and active travel • Recreation and leisure **Comments** • Green Belt • Highway network / highway safety • Trees and biodiversity • Impact on amenity • Impact on designated heritage assets • Increased pollution • Impact on PROWs	

• Safeguarding agricultural land – ALC survey recommended.	

Objections:

1. Proposed site allocation:

- 167 houses are not wanted (along with many more planned on Green Belt sites in the district).
- Would the housing be affordable?
- Potential for a smaller development (20 - 40) of affordable homes off Glenview Drive on the condition of no removal of mature woodland and minimal use of the remaining fields
- Site is effectively split into two distinct parcels, doubtful these could be connected by road with suitable gradient. Boundary should therefore be reduced to northern parcel only, removing southern parcel and mature woodland (approx. 2ha remaining).
- Should only be used as a last resort for the provision of smaller high quality eco homes

2. Consistency / compliance with policy:

- Would contravene Chapter 13 (Protecting Green Belt Land) of the NPPF (2019).
- Would contravene Chapter 15 (Conserving and enhancing the natural environment) of the NPPF (2019).
- Would contravene the following paragraphs of the NPPF (2019)
    - 91 (“Planning policies and decisions should aim to achieve healthy, inclusive and safe places”)
    - 96 (“Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities”).
    - 136 (“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”).
    - 137 (more brownfield land should be allocated and this site is not sustainable due to negative environmental impacts).
    - 138 (“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account…”).
    - 170(e) (“Planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability”).
    - 175 (a) (“if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”).

- 175 (c) (“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 reasons and a suitable compensation strategy exists”).
- 180 (“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment”).

3. Development on Green Belt land:

- Objection to the development of Green Belt land.
- No exceptional circumstances have been demonstrated.
- Use of brownfield land should be maximised first before considering Green Belt releases.
- Site separates urban areas of Shipley and Cottingley.
- Development would contribute to sprawl.
- Greenfield greenbelt sites more likely to be developed than brownfield sites due to greater profitability.

4. Location of development

- If Shipley is to have 1200 new houses, why are the majority going in this area alone?
- The SH4/H allocation represents a large increase in dwellings to one area, especially with other nearby Nab Wood (SH5/H and SH6/H) and Cottingley (CO1/H) allocations. Local Plan fails to consider cumulative impacts.
- Alternative land available at New Brighton, Cottingley (CO/011?) rather than this site
- Stop filling in the tiny and much needed green spots in built up areas - build a new town with schools etc instead.
- Site is not sustainable / sustainably located.
- Empty homes should be used first.
- Brownfield availability increased due to pandemic / altered working patterns / business changes – eg. More offices are likely to be available for conversion to residential
- Much brownfield with development potential has been omitted from this plan.
- 7 specific alternative sites in Shipley were suggested: former HMRC office; former garden centre at Hirst Lock; Carnegie Library; site of former Valley Road flats; building and land adjacent to Dock Lane; Nab Wood Middle School site (remaining tarmacked area); Shipley Hospital.

5. Site access:

- Glenview Drive is not suitably wide as an access road accepting only single file traffic. The pavement is also narrow with mature trees making the pathway difficult to walk on.
- Access should be via Cottingley Cliffe Rd only to avoid further rat running in Nab Wood area.
- Risk in emergency if no access onto Cottingley Cliffe Road.
- Glenview Road and Glenview Drive not suitable for high traffic.
- Site access cannot be achieved from Cottingley Cliffe Rd due to change in levels
- Would the Glenview Drive access be suitable? Topography and ability to accommodate traffic associated with 164 dwellings

6. Impact on the highway network / highway safety

- Increased congestion, traffic, road traffic collisions.
- Area is already congested especially at peak times.
- Impact on already-congested A650, including A650 / B6265 (Mercure Hotel roundabout), from this site and allocations SH5/H and SH6/H.
- No development should be permitted until the Shipley Eastern Bypass has been completed or other major infrastructure work completed to the junction of Saltaire Road(A657), Bingley Road (A650) and Moorhead Lane. The junction is operating over capacity and cannot take any more traffic.
- Would add to traffic through Cottingley via B6269 (Cottingley Cliffe Rd / Cottingley New Rd).
- Traffic from parents dropping off / collecting children from Cottingley Village Primary School already creates congestion on Cottingley Cliffe Rd which would be worsened by proposed allocation.
- Would worsen existing congestion at junction of Cottingley Cliffe Rd and Nab Wood Drive.
- Concerns over number of extra cars (1 / 2 / 3 cars per new dwelling).
- Would be car-dependent due to lack of local amenities and public transport, creating increased traffic
- Safety concerns for pedestrians on Glenview Drive / Glenview Rd.
- Already difficult for pedestrians to cross Cottingley Cliffe Road due to heavy traffic.
- Safety concerns for children travelling on foot to / from schools / childcare.
- Risk to highway safety on Bankfield Road and Cottingley Cliffe Road from additional vehicle movements.
- Area is already used for rat-running (particularly Nab Wood Drive / Bankfield Rd); drivers ignore speed limits / traffic calming measures.
- The junction of Glenview Road and Bankfield Road is dangerous due to rat running and poor visibility.
- On street parking increases the dangers and restricts access if needed by emergency vehicles; would be worsened.

7. Flood risk / drainage

- Would exacerbate existing flood risk to land and houses downhill of site.
- Site provides natural drainage and flood mitigation – loss of trees and construction of houses and paving would increase speed / frequency / volume of flooding from surface water runoff.
- Underground streams / land drains are confirmed to exist on site.
- Would exacerbate flooding of River Aire.
- Contrary to Local Flood Risk Management Strategy.
- If fields are no longer needed for grazing, they should be rewilded or trees planted to reduce flooding lower down the hill.

8. Impact on trees

- Loss of woodland.
- Loss of trees with TPOs and mature trees.
- Loss of hedges.
- Ancient woodland area adjacent to Bankfield Rd.
- Contrary to Woodland Strategy 2012 – 2028
- loss of TPO / mature trees if site is accessed from Bankfield Rd.

9. Impact on biodiversity / wildlife

- Site is important for biodiversity / wildlife which would be negatively impacted.
- Loss of habitat.
- Protected / vulnerable species have been seen on site.
- Site has been identified as a wildlife corridor.
- Woodland is identified as priority habitat (deciduous woodland).
- No environmental impact assessment.
- A Preliminary Ecological Appraisal should be carried out.
- Should be a commitment to Biodiversity Net Gain.
- Contrary to UK Biodiversity Action Plan.
- Additional noise would disturb wildlife.
- How could any future development demonstrate biodiversity net gain when the loss of the woodland is factored in?

10. Impact on air quality

- Site is important for air quality which would be negatively impacted.
- Increased traffic and loss of green space – negative impact on air quality.
- Site is already located within CAZ.
- Harm to air quality near a primary school (Cottingley Village Primary School).
- Development would worsen mental and physical health (due to loss of open space and woodland, increased pollution, noise, time spent in traffic).
- Air pollution during construction.
- Increased pollution due to lack of local amenities – people would need to travel by car to reach these services.

11. Impact on amenity

- Harm to character of the area.
- Negative impact on residents from additional traffic (air and noise pollution, congestion, traffic collisions).
- Loss of privacy, overlooking, and overshadowing of existing dwellings and new dwellings.
- Increased light pollution.
- General harm to existing residents' quality of life.
- Number of houses represents overdevelopment.
- The surrounding area is already overdeveloped.
- High density out of keeping with character of area.
- Object to low density (below 35dph minimum set out in Policy HO2).

12. Impact on health

- Site is important for mental and physical health (greenspace).
- Directly contravenes Public Health England's 2020 declaration that local authorities should maintain and preserve greenbelt areas as a crucial asset in health and well-being.
- Increased traffic = increased air pollution = increase in respiratory diseases.
- Contravenes outcomes 2 and 4 of Bradford's Joint Health and Wellbeing Strategy 2018-2023

13. Impact on local infrastructure

- Lack of local amenities (education, healthcare, retail, community or leisure facilities) to support this number of new houses.

- Any community areas, facilities, shops, leisure, play / exercise, walk, cycle ways, tree and scrub groves incorporated in this development?
- Increased pressure on utilities, drainage, road maintenance, waste collection.
- No play areas for children in local area.
- This allocation (SH4/H) along with other nearby allocations (SH5/H, SH6/H, CO1/H, NW19/H – 808 total dwellings) would increase demand for primary and secondary school places (already oversubscribed) – detrimental impact on existing residents.
- Lack of active travel links / public transport.
- Significant distance to nearest bus stop.
- What efforts will the council make to secure developer contributions to infrastructure, health and education?

14. Land stability

- Historic coal mining site – potentially unsafe and would add to costs of developing.
- Landfill site.
- Steeply sloping site.

15. Climate change / emergency

- Increased carbon emissions from car dependent site.
- Contravenes Council's "Zero Carbon Future" policy.
- Unless the new housing is net zero carbon, the housing itself would further exacerbate the problems of the "climate emergency".
- Against the Council's commitment to become a carbon neutral city region by 2038.
- Contrary to Council's Sustainable Development Action Plan.

16. Landscape impacts

- Detrimental impact on landscape.
- If houses are built on the higher-elevation part of site to south they would be visible for a long distance.
- Residential development of site would urbanise and alter the appearance of Nab Wood.
- Housing on this site would tower over existing properties and be clearly visible.

17. Impact on designated heritage assets

- Impact on Saltaire World Heritage Site buffer zone.
- Would destroy traditional field patterns.
- Detrimental impact of new housing on Grade II / II* listed buildings and their setting.

- Impact on conservation area.
- Before allocation, an assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the designated heritage asset and the impact that development would have.

18. Loss of greenspace / open space

- Site is well-used for recreation – accessible for locals.
- Lack of open / green space in the area.

19. Other

- Negative impact on water quality.
- Increased potential for criminal activity
- Loss of (high-quality) agricultural land.
- Previous planning applications have been refused – no change in circumstances.
- Consultation in lockdown has been difficult / undemocratic (timing / speed / lack of in-person events / lack of publicity).
- Loss of views.
- Would negatively impact house prices.
- Impact on PROWs.
- Merging of Cottingley and Shipley would lead to loss of local identity.
- SH4/H houses would likely not solve the housing problem for first-time buyers, or those on lower incomes, as new houses would likely be priced in keeping with the area
- Local roads are unsuitable for construction traffic.
- More effort should be made to regenerate Shipley town centre.
- Impact of pandemic and Brexit on housing need.

Support:

1. Proposed site allocation:

- More housing required for working people.
- Site boundary should be amended at SW edge to align with the field boundary.

2. Biodiversity

- Would impact on biodiversity.

3. Flood risk

- Site is located within Flood Zone 1 (FZ1).
- Further guidance provided on flood risk mitigation measures and surface water discharge rates.

4. Landscape

- Disagree with description of the site as being prominent from Cottingley Rd. The site is only visible from that road in the immediate vicinity. In medium distance views it is screened by topography, vegetation and existing development and in longer distance views it is seen within the context of the existing urban area.

5. Access and active travel

- Although a singular vehicle access point would be acceptable, a further access is possible from the existing field gate on Cottingley Cliffe Rd.
- Development of the site would provide opportunities to enhance and provide new pedestrian and cycle routes and connectivity for both recreation and travel.

6. Recreation and leisure

- Site is well-used for recreation.

Comments:

1. Green Belt

- Object to development of Green Belt land
- Use of available brownfield land should be maximised first before considering Green Belt releases
- Green Belt assessment – parcel 026 should be assessed as “major” as it plays a critical function in separating Nab Wood, Shipley from Cottingley, Bingley.
- SH4/H is clearly the least important site within parcel 026 when it comes to fulfilling Green Belt purpose 2. Whilst it is accepted that development would reduce the gap between Cottingley and Nab Wood by around 165m, a substantial gap and sense of separation would remain. Site should score low or moderate for purpose 2.
- Site should score moderate for purpose 3 (to align with parcel assessment score).

2. Highway network / highway safety

- Number of additional cars would be dangerous to people and animals
- Increased traffic in local area.
- Problems with existing road network (eg. Traffic volumes, parked cars reducing road width).

3. Trees and biodiversity • Impact on biodiversity / wildlife • Loss of trees and mature woodland. • Council ecology survey carried out before March, not correct time of year for this type of survey (before bat nesting / birds return for summer).
4. Impact on amenity • Loss of privacy, overlooking, and overshadowing of existing dwellings / new dwellings. • Number of houses represents overdevelopment. • Visual impact of development on landscape. • Harm to character of local area.
5. Impact on designated heritage assets • Impact on Grade II and II* listed buildings
6. Other • Increased pollution • Impact on PROWs • The allocation is on land which may be best and most versatile agricultural land. The plan should safeguard the long-term capability of such land (NPPF para 170). Recommend an ALC survey.

Representation IDs: 28, 90, 94, 96, 108, 134, 141, 142, 146, 147, 152, 154, 156, 158, 159, 161, 162, 165, 168, 177, 178, 180, 182, 187, 189, 259, 260, 277, 278, 284, 307, 322, 330, 331, 332, 346, 354, 366, 428, 434, 570, 622, 658, 659, 666, 668, 676, 697, 724, 730, 739, 747, 749, 879, 885, 915, 929, 950, 1001, 1170, 1202, 1223, 1250, 1272, 1291, 1405, 1413, 1449, 1461, 1465, 1471, 1481, 1551, 1599, 1602, 1685, 1721, 1732, 1739, 1809, 1845, 1847, 2040, 2042, 2124, 2134, 2159, 2160, 2170, 2197, 2199, 2228, 2247, 2312, 2337, 2391, 2393, 2400, 2445, 2490, 2496, 2499, 2596, 2598, 2803, 2818, 2821, 2822, 2865, 2938, 2946, 2999, 3023, 3028, 3039, 3051, 3055, 3060, 3061, 3068, 3071, 3088, 3167, 3225, 3254, 3299, 3308, 3313, 3373, 3476, 3481, 3505, 3510, 3532, 3589, 3640, 3642, 3734, 3803, 3857, 3876, 3901, 3913, 3989, 4024, 4029, 4035, 4066, 4071, 4082, 4103, 4111, 4134, 4170, 4174, 4193, 4202, 4285, 4294, 4299, 4310, 4312, 4349, 4372, 4378, 4383, 4391, 4395, 4411, 4413, 4447, 4489, 4498, 4505, 4508, 4545, 4546, 4549, 4574, 4580, 4595, 4597, 4618, 4620, 4624, 4632, 4634, 4636, 4681, 4685, 4688, 4704, 4713, 4725, 4746, 4753, 4755, 4774, 4780, 4784, 4790, 4801, 4839, 4845, 4876, 4881, 4893, 4912, 4921, 4943, 4951, 5008, 5051, 5064, 5076, 5098, 5135, 5136, 5141, 5144, 5145, 5177, 5183, 5187, 5307, 5310, 5344, 5355, 5409, 5430, 5473, 5507, 5510, 5527, 5533, 5539, 5540, 5558, 5584, 5585, 5586, 5599, 5603, 5614, 5628, 5639, 5714, 5720, 5754, 5763, 5786, 5814,

5872, 5877, 5879, 5915, 5950, 5951, 5991, 6146, 6729, 7025, 7212, 7275, 7276, 7534, 7711, 8011, 8121, 8183, 8321, 9646, 9955, 10544, 11278, 11307, 11366, 11501, 11899, 12373, 12648, 13172, 13721, 14924, 14942, 14952, 15021, 15211, 15488, 15537, 16098, 16297, 16378, 16557, 16683, 16744, 17074, 17263, 18287, 18782, 19186, 19206, 19762, 19801, 19815, 19905, 20087, 20156, 21243, 21415, 21779, 23928, 24600, 25286, 25698, 27925, 27926, 28358, 28513, 28587, 28730, 28984, 29306, 29397, 29501, 29641, 29691, 29866, 30048, 30117, 30189, 30226, 30229, 30233, 30242, 30244, 30247

SH5/H - Bingley Road, Nabwood

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH5/H - Bingley Road, Nabwood	292	261	273	16	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Objections** • Government housing figures • Housing need figures • Selection reasoning • Housing numbers too high for Shipley • Housing size • Affordable housing • Balance between housing provision and protecting greenspace • Reduction of site size • Housing mix • Site selection • Suitable only for high design eco friendly houses • Provision of Bradfords housing need by neighbouring authorities. • Consistency / compliance with policy • Development on Green Belt land • Location of development • Site access • Impact on highway network / highway safety	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as H1059 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

• Flood risk • Impact on designated heritage assets • Impact on trees • Impact on biodiversity • Impact on air quality • Impact on amenity • Impact on health • Impacts on local infrastructure • Land stability • Climate change / emergency • Landscape impacts • Loss of green space / open space • Recreation / leisure • Agricultural land • Water quality / increased water pollution. • Loss of identity due to urban sprawl. • Development not welcomed locally. • Loss of connection with nature. • Impact of construction on residents. • House price reduction. • Road congestion. • Protection of ancient fields. **Support** • Good place to live – as long as available for all. • More housing needed for working people. • Best greenfield site for residential development • Housing mix • No technical constraints to delivery. • The site could accommodate 140 dwellings • The site is available and deliverable now.	

• It would make an important contribution towards meeting the housing requirements of the District. • A developer is willing to work collaboratively to deliver SH6/H alongside SH5/H. • Green Belt. • Location of development. • Impact on highway network / highway safety. • Amenity. • Flood risk. • Infrastructure. • Biodiversity. • Designated heritage assets. • Open space. • Landscape. • Recreation / leisure • Should provide a range of housing to cater to all budgets. **Comments** • Highway network • Agricultural land • Flood Risk / damage.	

Objections:
1. Proposed site allocation: • Are housing figures dictated by Government rather than local people? • Concern over how housing need figures for Shipley are calculated – do they consider impact of pandemic, fall in birthrate through lockdown, fall in migration due to Brexit? • Every site needs clear/undisputable reasoning for inclusion. • Huge number of houses proposed for Shipley. • Would housing be of a reasonable size?

- Would housing be affordable (to local residents)?
- Unlikely to make a sufficient contribution to meeting affordable housing need in Shipley.
- Housing provision should be balanced with protecting greenspace.
- Possibly a small part of the site near the road could be used for housing.
- Support alleviating the housing shortage via sympathetic development especially if plans include one-bed and two-bed homes.
- Should only be used as a last resort for the provision of smaller high quality eco homes.
- Discussions should take place with neighbouring authorities about whether they could accommodate some of the identified need for development.

2. Consistency / compliance with policy:

- Adverse environmental and social impacts of this housing proposal on the local road network and residential areas contravening Policy SP7.
- Local Area Strategy for Cottingley refers to “Maintaining the Green Belt gap between Cottingley, Shipley and Bradford”.
- Would contravene the following paragraphs of the NPPF (2019)
    - 133 (“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”)
    - 134(b) (purpose 2 of the Green Belt – “to prevent neighbouring towns merging into one another”).
    - 136 (“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”).
    - 137 (more brownfield land should be allocated, and this site is not sustainable due to negative environmental impacts).

3. Development on Green Belt land:

- Object to development on Green Belt.
- Would reduce separation between Shipley and neighbouring settlements (Bingley, Cottingley).
- Would contribute to sprawl.
- Last Green Belt land in this area.
- Sets a precedent for further erosion of the Green Belt.
- The ‘need for development’ is not a sound enough (exceptional) reason when councils develop their local plans.
- Support proposed allocation but disagree with Council’s Green Belt site assessment - consider that the impact upon the green belt would be considerably less than that concluded by the Council. Development of the site would not result in the unrestricted sprawl - it is considered infill development rather than extension to the existing settlement. Development of the site would not lead to a

greater degree of merging of settlements than the existing situation. The site does not play an important role in safeguarding the countryside from encroachment.

- Query the benefit of losing Green Belt land for only 150 houses, most of which won't be affordable?

4. Location of development

- Brownfield sites should be developed instead / first [no specific sites provided].
- 3 specific alternative sites in Shipley were suggested: site of former Valley Road flats; Nab Wood Middle School site (remaining tarmacked area); Shipley Hospital.
- Brownfield availability has increased due to pandemic / altered working patterns / business changes – more offices / retail spaces are likely to be available for conversion to residential.
- A full and comprehensive review of potential new brownfield site availability must be done.
- Brownfield sites are overlooked because they are not appealing to developers.
- Empty / derelict properties should be developed / regenerated first.
- Existing housing should be improved instead.
- Not a sustainable location for development.
- New housing should be built close to stations and transport hubs.
- If Shipley is to have 1200 new houses, why are the majority going in this area alone?
- New town with sufficient infrastructure should be built instead of filling in small and much needed green spaces in built up areas.
- Loss of one of the last areas of open landscape between Cottingley and Shipley.
- Bypass causes noise and air pollution – unsuitable place for new homes.

5. Site access

- Poor site access.
- Branksome Drive / Grove is not sufficiently wide for access (including emergency services).
- Access via Branksome Drive / Grove would cause disruption and congestion.
- Access to site would cause queueing traffic on A650.
- Access for construction traffic via Branksome Grove or Drive is not acceptable (parked cars reduce width).

6. Impact on highway network / highway safety:

- Would increase traffic / congestion.
- A650 is already congested (especially at peak times).
- Would increase congestion at A650 / B6265 (Mercure Hotel) roundabout.

- Would increase congestion at A650 junction with Branksome Drive, Nab Lane and New Close Rd.
- Would increase use of B6265 Bradford Rd / Bingley Main St / Keighley Rd to avoid A650.
- Saltaire is already congested / bottleneck.
- Would increase congestion in Saltaire.
- Lack of local amenities and public transport – people would need to travel by car, thereby increasing traffic.
- Severe traffic congestion at school drop off / pick up times.
- No development should be permitted until the Shipley Eastern Bypass has been completed or other major infrastructure work completed to the junction of Saltaire Road(A657), Bingley Road (A650) and Moorhead Lane. The junction is operating over capacity and cannot take any more traffic.
- Impacts on journey times between Bingley / Shipley / Keighley / Saltaire
- Additional delays through traffic lights.
- Already difficult to exit Branksome Drive onto A650 (busy and fast-moving traffic, lack of visibility).
- Exiting onto A650 would be dangerous.
- Traffic signals would be needed on junction at Branksome Drive with A650 – would increase delays even further.
- Recent planning applications refused on highways grounds.
- High speed traffic on A650.
- High number of traffic collisions on A650.
- Would increase traffic collisions.
- Roads would be steep - risk of collisions in winter conditions.
- Increased traffic would be dangerous.
- Recent child fatality on Bingley Road.
- Safety concerns if A650 roundabout is blocked.
- Lack of pavements on A650 (Cottingley traffic lights to Branksome Drive).
- Lack of cycle lanes on A650 (Cottingley traffic lights to Saltaire).
- Main pedestrian access to amenities / services is via dangerous A650.
- Nab Wood already has a traffic issue which would be worsened by this development.
- Would cause delays and a rat run into and out of Nab Wood.
- Branksome Drive / Grove would be used as rat runs cutting through to get to the main road.
- New rat runs would be created to avoid additional traffic on A650.

7. Flood risk

- Would increase flood risk on site.
- Would increase flood risk to properties on Branksome Grove and Branksome Drive.
- Branksome Drive / Grove – high flood risk area with recent history of flooding (2000 and 2015).
- Site is on the floodplain.
- Area already frequently floods.
- Underground streams / land drains are confirmed to exist on site and in surrounding area.
- Access to the site would be through a high flood risk area (Branksome Grove).
- If site were developed, bypass would flood.
- Developing this site would increase runoff into River Aire and peak river levels – likely to increase flooding.
- Flood risk is likely to increase in future due to climate change.
- Greenfield site with trees absorbs rainfall, slowing runoff rates, reducing volume of runoff and thus reducing flood risk.
- There would be an increase in run-off from hard landscaping / construction of houses, therefore increasing flood risk.
- Flood risk could be reduced slightly by providing houses with green/planted roofs and providing parking areas with green absorbent paving.
- It is unlikely that retention ponds (if built) within the site would be sufficient to hold the volume of water required within the site.
- SUDs would add to development costs
- If fields are no longer needed for grazing, they should be rewilded or trees planted to reduce flooding lower down the hill.
- Would be impossible to sell the houses because homeowners would not be able to get insurance due to flood risk.
- Would contravene Bradford's Local Flood Risk Management Strategy of December 2016.
- Longitudinal study required by Environment Agency and other professional bodies to evaluate proposed development on resultant river discharge rates.

8. Impact on designated heritage assets:

- Impact on Saltaire World Heritage Site (within buffer zone).
- Loss of agricultural character – adds to setting of WHS.
- Effect on listed buildings and conservation area.
- Before allocation, an assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the designated heritage asset and the impact that development would have.

9. Impact on trees

- Loss of trees protected by TPOs.
- Loss of mature trees and woodland.
- Loss of hedgerows.
- Should retain all mature trees on site.
- Site should be used for tree planting instead.
- Loss of mature trees would contravene The Woodland Strategy for Bradford District 2012-2028 and Bradford's Sustainable Development Action Plan, 'Living within environmental limits'

10. Impact on biodiversity:

- Developing this site would negatively impact wildlife.
- Loss of habitat.
- Site provides a corridor for nature.
- Would development include hedgehog highways and summer migrating birds habitat?
- Protected species spotted on site.
- Close to River Aire which is wildlife habitat – would be negatively impacted.
- No environmental impact assessment.
- Should commit to Biodiversity Net Gain.
- Contravenes UK Biodiversity Action Plan.

11. Impact on air quality:

- Site helps improve air quality.
- Developing this site would adversely affect air quality.
- Area around A650 already has very poor air quality.
- Site is within CAZ – significant air pollution in this area.
- Development would make meeting CAZ targets more difficult.
- Lack of local amenities – people need to travel by car to reach these services, thereby increasing air pollution.
- Increased traffic means increased pollution aggravating asthma, COPD and all respiratory diseases.

12. Impact on amenity:

- Loss of visual amenity.
- Loss of views.

- Loss of privacy.
- Overlooking.
- Overshadowing.
- Increased noise pollution.
- Increased light pollution.
- The surrounding area is already overdeveloped.
- High density out of keeping with character of area.
- Object to low density (below 35dph minimum set out in Policy HO2).
- The site is in a prominent position between Cottingley and Shipley on the A650.

13. Impact on health

- Adverse effects on mental and physical health.
- Impacts of flooding on health.
- Contravenes Public Health England's 2020 declaration that local authorities should maintain and preserve greenbelt areas as a crucial asset in health and well-being.
- Site enables a healthy commuting / walking route to Bingley which avoids the polluted main road. The Council's plan would either force people to walk among the traffic or add to it by driving or using public transport, which is not good for people with health issues including asthma.

14. Impacts on local infrastructure:

- Lack of local services to support development (healthcare, education, religious, retail, hospitality, public transport, active travel links).
- Would put pressure on (already oversubscribed) school places and healthcare services, impacting existing residents.
- Current drainage/sewage systems don't have sufficient capacity for volume of water/sewage.
- Railway stations not in walking distance, lack of good public transport links.
- Cumulative impact of this allocation (SH4/H) along with other nearby allocations (SH5/H, SH6/H, CO1/H, NW19/H – 808 total dwellings) on existing infrastructure (education and healthcare provision).
- These sites are classed as Shipley, but in real terms would probably have the most impact on the residents and infrastructure of Cottingley / Cottingley Bar.
- What efforts would the council make to secure developer contributions to infrastructure, health and education?

15. Land stability:

- Unacceptable impacts on ground stability.

16. Climate change / emergency:

- Loss of trees which capture and store carbon.
- Would housing be eco-friendly? With solar panels?
- Contravenes Council's "Zero Carbon Future" policy.
- Cutting down trees and getting rid of green spaces contributes to global warming.
- Does not factor in the carbon footprint of the new development despite climate emergency declaration.
- "Keeping Rivers Cool" priority area.
- Would make meeting national carbon emissions targets more difficult.

17. Landscape impacts:

- Would destroy the landscape.
- Visible from many vantage points.
- The site is part of historic green view across the Aire Valley towards Bingley.
- Important to maintain open landscape buffer between Cottingley and Shipley.

18. Loss of green space / open space:

- Loss of green space.
- One of the few green spaces left surrounding Shipley.
- Last area of open space along A650.
- Green spaces are important for mental and physical health and wellbeing.

19. Recreation / leisure:

- Site is well-used for recreation (e.g. walking)
- Impact on PROWs (including Bradford Millennium Way)

20. Agricultural land

- Would result in loss of agricultural land.
- Located in Higher Level Stewardship Target Area.

21. Other:

- Negative impact on water quality / increased water pollution.
- Urban sprawl / merging of Bingley and Shipley would lead to loss of local identity.
- Development not welcomed locally.
- Would result in loss of connection with nature.
- Impact of construction on residents, traffic, wildlife, woodland, local businesses.
- Reduction of house prices.
- Existing congestion makes travel to better paying jobs in Leeds more difficult, especially managing around school times.
- Ancient fields should be protected.

Support:

1. Proposed site allocation:

- Support the development of the site as it would make a very pleasant place to live, although it would need to be available to a cross section of the population.
- We need more housing for working people.
- Best suited greenfield site in Shipley for residential development.
- Shipley lacks detached and semi-detached houses (below national average) – this site could provide more houses of this type.
- The site assessment demonstrates that the site has no significant technical constraints which would prevent its delivery for housing development.
- The site could accommodate 140 dwellings whilst retaining and enhancing the PROW, providing new areas of public open space, retaining most of the existing vegetation and enhancing the ecology of the site through new tree planting.
- The site is available and deliverable now and would make an important contribution towards meeting the housing requirements of the District.
- A developer is willing to work collaboratively to deliver SH6/H Bankfield Farm, Nab Wood comprehensively alongside SH5/H.

2. Green Belt:

- Green Belt releases are required to meet the future housing requirements of the District. The proposed removal of the site from the Green Belt and allocation for housing is justified and appropriate and would not prejudice the five purposes of the Green Belt as set out in the NPPF.

3. Location of development:

- Opportunity for families to live in a popular and lovely area.
- Other areas of the city don't have as much green space to enjoy, so should be protected in places such as the inner city. Sites like SH5/H should be developed - already of parks, woodland and fields nearby.
- Would help to ease the housing pressure in densely populated areas of the city centre.
- The site is lies in a sustainable location with easy access of a good range of local services and public transport services.

4. Impact on highway network / highway safety:

- The local area has excellent access and egress from the main road network.
- Site has excellent traffic links – A650 and public transport connections

5. Amenity:

- Could be designed sensitively with local woodland as screening and green space for residents.
- The site is not overly visible for most existing local residents or passing traffic.
- Only visible from adjacent houses.
- Would not affect local residents or visitors to the area.
- Site would not impact greatly on local residents as it has natural barriers and borders.

6. Flood risk:

- Site has low flood risk.

7. Infrastructure:

- It would have good access to local schools.
- Has access to open / green space and recreation areas.
- Close proximity to public transport.
- Easy links to Bradford and Leeds.

8. Biodiversity:

- Site could be developed without impacting on local natural habitat and wildlife – not a very sensitive area.

9. Designated heritage assets:

- Would not impact on Saltaire WHS

10. Open space:

- 80 sites identified as open space in Shipley (just less than 100ha) – ample amount.

11. Landscape:

- The site would be unobtrusive.

12. Recreation / leisure:

- Would provide easy access to lovely walks for families to enjoy through Hirst Woods, along the River Aire, and the Leeds Liverpool Canal.
- Private land - not usable for recreation.

13. Other:

- Should provide a range of housing to cater to all budgets.

Comments:

1. Highway network:

- Access to the A650 from Branksome Drive is a nightmare.

2. Agricultural land

- The allocation is on land which may be best and most versatile agricultural land. The plan should safeguard the long-term capability of such land (NPPF para 170). Recommend an ALC survey.

3. Flood risk / drainage

- Site is fully within Flood Zones 2 (FZ2) and 3 (FZ3) and contains small section of draft Flood Zone 3b (FZ3b)/current Flood Zone 3ai (FZ3ai).
- No development should take place within draft FZ3b or current FZ3ai unless considered water compatible. Development should follow a sequential layout to prevent un-necessary development in areas within higher degree of flood risk.
- Further guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required

Representation IDs: 79, 80, 88, 95, 97, 109, 127, 148, 153, 163, 169, 179, 186, 191, 199, 212, 281, 282, 308, 352, 355, 368, 429, 519, 599, 609, 613, 623, 661, 669, 672, 673, 684, 698, 786, 853, 880, 884, 916, 918, 948, 972, 1149, 1160, 1178, 1224, 1252, 1274, 1292, 1339, 1340, 1424, 1432, 1447, 1462, 1467, 1488, 1513, 1547, 1664, 1717, 1731, 1756, 1822, 1841, 1851, 1896, 1951, 2000, 2043, 2048, 2074, 2122,

2125, 2141, 2143, 2145, 2162, 2171, 2205, 2218, 2248, 2249, 2262, 2275, 2296, 2327, 2356, 2392, 2395, 2396, 2401, 2417, 2420, 2427, 2428, 2429, 2438, 2448, 2471, 2500, 2529, 2565, 2573, 2595, 2599, 2650, 2714, 2811, 2820, 2858, 2874, 3054, 3132, 3181, 3211, 3223, 3246, 3309, 3329, 3330, 3333, 3339, 3341, 3344, 3346, 3351, 3354, 3355, 3363, 3376, 3379, 3392, 3399, 3401, 3403, 3414, 3433, 3445, 3489, 3502, 3504, 3591, 3616, 3631, 3736, 3888, 3999, 4030, 4047, 4081, 4145, 4194, 4208, 4255, 4257, 4393, 4403, 4405, 4424, 4485, 4490, 4511, 4538, 4565, 4626, 4653, 4678, 4683, 4702, 4720, 4747, 4750, 4754, 4765, 4799, 4920, 4924, 4961, 4982, 5066, 5093, 5189, 5193, 5202, 5266, 5302, 5345, 5408, 5427, 5442, 5457, 5528, 5535, 5541, 5548, 5552, 5578, 5619, 5649, 5689, 5696, 5698, 5707, 5723, 5724, 5739, 5765, 5782, 5837, 5838, 5889, 5912, 5953, 5957, 5960, 5980, 6143, 6553, 7029, 7535, 7732, 8008, 8107, 8119, 8122, 8184, 10007, 10109, 10501, 10675, 10676, 10678, 10734, 10759, 11266, 11279, 11389, 11502, 11595, 12322, 12528, 12649, 13124, 13589, 13718, 15209, 16685, 16745, 16956, 16981, 17224, 17264, 18746, 19207, 19802, 19816, 19900, 20083, 21056, 21171, 21359, 21401, 21498, 25586, 25628, 25699, 26626, 26627, 28136, 28210, 28244, 28310, 28382, 28588, 28732, 28884, 28885, 28908, 28919, 29307, 29497, 29502, 29680, 30118, 30230, 30234, 30243, 30245, 30262, 30267, 30269

SH6/H - Bankfield Farm, Nabwood

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH6/H - Bankfield Farm, Nabwood	207	193	202	2	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: Objections • Government figures used. • Housing need figures • Shipley housing requirement is too high. • Housing size • Affordable housing • Meeting affordable housing need • Housing mix • Site selection • Only suitable for high quality eco homes • Consider if neighbouring authorities can take some of Bradfords identified housing need. • Consistency / compliance with policy. • Development on Green Belt land. • Location of development • Site access • Impact on highway network / highway safety • Flood risk • Impact on designated heritage assets	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1060) is not carried forward as a preferred option and rejected. • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

• Impact on trees • Impact on biodiversity • Impact on air quality • Impact on amenity • Impact on health • Impacts on local infrastructure • Land stability • Climate change / emergency • Landscape impacts • Loss of green space / open space • Recreation • Agricultural land • Water quality / increased water pollution. • Local identity loss due to urban sprawl / merging of Bingley and Shipley. • Development not welcomed locally. • Loss of connection with nature. • Impact of construction on residents. • Reduction of house prices. • Road congestion. • Consultation period extension • Views of local residents must be listened to. • Ancient fields should be protected. • Questioning benefits of this proposal. **Support** • More houses needed for young working people. • Location of development • Infrastructure • Open space • Recreation / leisure	

Comments • Flood risk / drainage • Highway network	

Objections:
1. Proposed site allocation: • Are housing figures dictated by Government rather than local people? • Concern over how housing need figures for Shipley are calculated – do they consider impact of pandemic, fall in birthrate through lockdown, fall in migration due to Brexit? • Huge number of houses proposed for Shipley. • Would housing be of a reasonable size? • Would housing be affordable (to local residents)? • Unlikely to make a sufficient contribution to meeting affordable housing need in Shipley. • Support alleviating the housing shortage via sympathetic development especially if plans include one-bed and two-bed homes. • Should only be used as a last resort for the provision of smaller high quality eco homes. • Discussions should take place with neighbouring authorities about whether they could accommodate some of the identified need for development
2. Consistency / compliance with policy: • Adverse environmental and social impacts of this housing proposal on the local road network and residential areas contravening Policy SP7. • Local Area Strategy for Cottingley refers to “Maintaining the Green Belt gap between Cottingley, Shipley and Bradford”. • Would contravene the following paragraphs of the NPPF (2019)   ○ 134 (five purposes of the Green Belt).   ○ 136 (“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”).   ○ 137 (more brownfield land should be allocated, and this site is not sustainable due to negative environmental impacts).   ○ 145 (“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt”)
3. Development on Green Belt land: • Object to development on Green Belt.

- Would reduce separation between Shipley and neighbouring settlements (Bingley, Cottingley).
- Sets a precedent for further erosion of the Green Belt.
- The 'need for development' is not a sound enough (exceptional) reason when councils develop their local plans.
- Purpose 4 of Green Belt - to preserve the setting and special character of historic towns – Saltaire WHS.

4. Location of development

- Brownfield sites should be developed instead / first. [no specific sites provided]
- 3 specific alternative sites in Shipley were suggested: site of former Valley Road flats; Former Associated Waste Management Site; Nab Wood Middle School site (remaining tarmacked area).
- Brownfield availability has increased due to pandemic / altered working patterns / business changes – more offices / retail spaces are likely to be available for conversion to residential.
- A review of potential new brownfield site availability must be done.
- Brownfield sites are overlooked because they are not appealing to developers.
- Empty / derelict properties should be developed / regenerated first.
- Existing housing should be improved instead.
- New town with sufficient infrastructure should be built instead of filling in small and much needed green spaces in built up areas.
- Loss of one of the last areas of open landscape between Cottingley and Shipley.
- Bypass causes noise and air pollution – unsuitable place for new homes.

5. Site access

- Poor site access.
- Branksome Drive / Grove is not sufficiently wide for access (including emergency services).
- Access via Branksome Drive / Grove would cause disruption and congestion.
- Access to site would cause queueing traffic on A650.
- Access for construction traffic via Branksome Grove or Drive is not acceptable (parked cars reduce width).

6. Impact on highway network / highway safety:

- Would increase traffic / congestion.
- A650 is already congested (especially at peak times).
- Would increase congestion at A650 / B6265 (Mercure Hotel) roundabout.
- Saltaire is already congested / bottleneck.
- Would increase congestion in Saltaire and Cottingley.
- Lack of local amenities and public transport – people would need to travel by car, thereby increasing traffic.

- No development should be permitted until the Shipley Eastern Bypass has been completed or other major infrastructure work completed to the junction of Saltaire Road(A657), Bingley Road (A650) and Moorhead Lane. The junction is operating over capacity and cannot take any more traffic.
- Impacts on journey times between Bingley / Shipley / Keighley / Saltaire.
- Additional delays through traffic lights.
- Already difficult to exit Branksome Drive onto A650 (busy and fast-moving traffic, lack of visibility).
- Exiting onto A650 would be dangerous.
- Recent planning applications refused on highways grounds.
- High speed traffic on A650.
- High number of traffic collisions on A650.
- Would increase traffic collisions.
- Roads would be steep - risk of collisions in winter conditions.
- Increased traffic would be dangerous (particularly for children / pedestrians).
- Safety concerns if A650 roundabout is blocked.
- Lack of pavements on A650.
- Lack of cycle lanes on A650.
- Nab Wood already has a traffic issue which would be worsened by this development.
- Would cause delays and a rat run into and out of Nab Wood.
- New rat runs would be created to avoid additional traffic on A650.

7. Flood risk

- Would increase flood risk on site.
- Would increase flood risk to properties on Branksome Grove and Branksome Drive.
- Branksome Drive / Grove – high flood risk area with recent history of flooding (2000 and 2015).
- Site is on the floodplain.
- Area already frequently floods.
- Underground streams / land drains are confirmed to exist on site and in surrounding area.
- Developing this site would increase runoff into River Aire and peak river levels – likely to increase flooding.
- Flood risk is likely to increase in future due to climate change.
- Greenfield site with trees absorbs rainfall, slowing runoff rates, reducing volume of runoff and thus reducing flood risk.

- There would be an increase in run-off from hard landscaping / construction of houses, therefore increasing flood risk.
- Site is sloping – increases surface water runoff.
- It is unlikely that retention ponds (if built) within the site would be sufficient to hold the volume of water required within the site.
- SUDs would add to development costs.
- Would be impossible to sell the houses because homeowners would not be able to get insurance due to flood risk.
- Would contravene Bradford's Local Flood Risk Management Strategy of December 2016.
- Longitudinal study required by Environment Agency and other professional bodies to evaluate proposed development on resultant river discharge rates.
- Land should be used for flood alleviation.

8. Impact on designated heritage assets:

- Impact on Saltaire World Heritage Site (within buffer zone).
- Effect on listed buildings and conservation area.
- Before allocation, an assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the designated heritage asset and the impact that development would have.

9. Impact on trees

- Loss of trees protected by TPOs.
- Loss of mature trees and woodland.
- Loss of hedgerows.
- Site should be used for tree planting instead.
- Mature trees help absorb noise and air pollution from the A650.
- Loss of mature trees would contravene The Woodland Strategy for Bradford District 2012-2028 and Bradford's Sustainable Development Action Plan, 'Living within environmental limits'

10. Impact on biodiversity:

- Developing this site would negatively impact wildlife.
- Loss of habitat.

- Site provides a corridor for nature.
- Protected species spotted on site.
- Close to River Aire which is wildlife habitat – would be negatively impacted.
- No environmental impact assessment.
- Contravenes UK Biodiversity Action Plan and Council's Biodiversity policy.
- There is very little land with capacity to improve biodiversity between Shipley and Bingley.

11. Impact on air quality:

- Site helps improve air quality.
- Developing this site would adversely affect air quality.
- Area around A650 already has very poor air quality.
- Site is within CAZ – significant air pollution in this area.
- Development would make meeting CAZ targets more difficult.
- Lack of local amenities – people need to travel by car to reach these services, thereby increasing air pollution.
- Increased traffic means increased pollution aggravating asthma, COPD and all respiratory diseases.

12. Impact on amenity:

- Loss of visual amenity.
- Loss of views.
- Loss of privacy.
- Overlooking.
- Overshadowing.
- Increased noise pollution.
- The surrounding area is already overdeveloped.
- Object to low density (below 35dph minimum set out in Policy HO2).
- The site is in a prominent position between Cottingley and Shipley on the A650.

13. Impact on health

- Adverse effects on mental and physical health.
- Impacts of flooding on health.

- Contravenes Public Health England's 2020 declaration that local authorities should maintain and preserve greenbelt areas as a crucial asset in health and well-being.
- Site enables a healthy commuting / walking route to Bingley which avoids the polluted main road. The Council's plan would either force people to walk among the traffic or add to it by driving or using public transport, which is not good for people with health issues including asthma.

14. Impacts on local infrastructure:

- Lack of local services to support development (healthcare, education, retail, public transport, active travel links, open space, road maintenance, waste collection).
- Would put pressure on (already oversubscribed) school places and healthcare services, impacting existing residents.
- Current drainage/sewage systems don't have sufficient capacity for volume of water/sewage.
- Railway stations not in walking distance, lack of good public transport links.
- Cumulative impact of this allocation (SH4/H) along with other nearby allocations (SH5/H, SH6/H, CO1/H, NW19/H – 808 total dwellings) on existing infrastructure (education and healthcare provision).
- These sites are classed as Shipley, but in real terms would probably have the most impact on the residents and infrastructure of Cottingley / Cottingley Bar.
- What efforts would the council make to secure developer contributions to infrastructure, health and education?

15. Land stability:

- Unacceptable impacts on ground stability.

16. Climate change / emergency:

- Loss of trees which capture and store carbon.
- Would housing be eco-friendly? With solar panels?
- Contravenes Council's "Zero Carbon Future" policy.
- Does not factor in the carbon footprint of the new development despite climate emergency declaration.

17. Landscape impacts:

- Loss of landscape value/character.

- The site is part of historic green view across the Aire Valley towards Bingley.
- Important to maintain open landscape buffer between Cottingley and Shipley.

18. Loss of green space / open space:

- Loss of green space.
- One of the few green spaces left surrounding Shipley.
- Last area of open space along A650.
- Green spaces are important for mental and physical health and wellbeing.

19. Recreation:

- Area is well-used for recreation.
- Will spoil enjoyment of area by locals and visitors.
- Negative impact on River Aire which is a recreational space.
- Impact on PROWs (including Bradford Millennium Way).

20. Agricultural land:

- Would result in loss of agricultural land.
- Supposedly protected agricultural land.

21. Other:

- Negative impact on water quality / increased water pollution.
- Urban sprawl / merging of Bingley and Shipley would lead to loss of local identity.
- Development not welcomed locally.
- Would result in loss of connection with nature.
- Impact of construction on residents, traffic, wildlife, woodland, local businesses.
- Reduction of house prices.
- Existing congestion makes travel to better paying jobs in Leeds more difficult, especially managing around school times.
- Consultation period should and could be extended, views of local residents must be listened to.
- Ancient fields should be protected.
- What are the credible benefits of this proposal?

Support:

1. **Proposed site allocation**:
   - We need more houses for young working people.

2. **Location of development:**
   - Opportunity for families to live in a popular and lovely area.
   - Other areas of the city don't have as much green space to enjoy, so should be protected in places such as the inner city. Sites like SH6/H should be developed - already of parks, woodland and fields nearby.
   - Highly sought after area.

3. **Infrastructure:**
   - Close proximity to public transport.
   - Easy links to Bradford and Leeds.

4. **Open space:**
   - 80 sites identified as open space in Shipley (just less than 100ha) – ample amount.

5. **Recreation / leisure:**
   - Would provide easy access to lovely walks for families to enjoy through Hirst Woods, along the River Aire, and the Leeds Liverpool Canal.

Comments:

1. **Flood risk / drainage:**
   - Part of the site below the Bankfield Hotel is close to the river which floods regularly.
   - Site is fully within Flood Zones 2 (FZ2) and 3 (FZ3) and contains draft Flood Zone 3b (FZ3b)/current Flood Zone 3ai (FZ3ai).
   - No development should take place within draft FZ3b or current FZ3ai unless considered water compatible. Development should follow a sequential layout to prevent un-necessary development in areas within higher degree of flood risk.
   - Further guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required

2. **Highway network:**
   - Access to A650 from Branksome Drive is a nightmare.

Representation IDs: 89, 110, 128, 149, 151, 155, 171, 176, 213, 280, 283, 306, 353, 356, 430, 435, 651, 662, 685, 854, 881, 883, 919, 949, 973, 1161, 1183, 1226, 1253, 1275, 1293, 1421, 1436, 1448, 1464, 1469, 1486, 1514, 1549, 1719, 1730, 1761, 1831, 1840, 1842, 1862, 2045, 2075, 2123, 2127, 2173, 2251, 2297, 2343, 2357, 2394, 2402, 2430, 2439, 2453, 2501, 2597, 2600, 2651, 2703, 2709, 2715, 2812, 2878, 2879, 3186, 3221, 3251, 3310, 3345, 3356, 3358, 3359, 3360, 3361, 3364, 3380, 3404, 3406, 3407, 3408, 3437, 3447, 3507, 3618, 3633, 3916, 4000, 4031, 4083, 4409, 4417, 4494, 4512, 4539, 4568, 4628, 4655, 4682, 4703, 4722, 4748, 4751, 4766, 4847, 4925, 4926, 4960, 4995, 5067, 5201, 5214, 5278, 5286, 5304, 5346, 5410, 5447, 5461, 5504, 5529, 5542, 5554, 5576, 5711, 5726, 5730, 5766, 5825, 5840, 5892, 5919, 5963, 6112, 6144, 6554, 7536, 8009, 8108, 8120, 8123, 8182, 8185, 8632, 10008, 10073, 10108, 10503, 10677, 10735, 11000, 11267, 11280, 11380, 11390, 11504, 11605, 12323, 12529, 12650, 13125, 13590, 13719, 15210, 16684, 16746, 16957, 16982, 17225, 17265, 18747, 19208, 19803, 19817, 20085, 21057, 21172, 21360, 21402, 21499, 25629, 25700, 28137, 28211, 28246, 28311, 28383, 28589, 28733, 28910, 28982, 29308, 29498, 29681, 30119, 30227, 30231, 30235, 30246, 30263, 30268, 30270

SH7/H - Queens Road/Ferncliffe Road, Saltaire

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH7/H - Queens Road/ Ferncliffe Road, Saltaire	23	22	14	8	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Objections** • Number of houses proposed • Area is overdeveloped • Density is too high • Consistency / compliance with policy • Development on Green Belt land • Impact on the highway network / highway safety • Flood risk / drainage • Loss of greenspace • Loss of trees • Impact on biodiversity / wildlife • Impact on amenity • Impact on heritage • Impact on local infrastructure • Impact on water quality. • No environmental impact assessment. **Support** • Vacant brownfield site. • Issues to be resolved - parking, traffic, biodiversity/wildlife.	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as H1061 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

• Consideration - energy-efficient building construction, car-free development, provision of open space / greenspace, accommodation of trees. • Good access to infrastructure / amenities and public transport. **Comments** • Flood risk / drainage	

Objections:
1. Proposed site allocation: • Affordable housing is needed in local area but concerned about number of houses proposed for this site. • Area is overdeveloped, housing density too high.
2. Consistency / compliance with policy • Loss of habitat and food sources for mammals, bird life, moths, butterflies, amphibians and reptiles. Thus negatively impacting BMDC's Biodiversity Policy and Green Infrastructure Corridors. • Brownfield sites should be prioritised in line with CBMDC policy.
3. Development on Green Belt land • Contrary to Green Belt policy in NPPF. • The Council needs to allocate housing to more brownfield sites across the Local Plan area (such as at Valley Road) instead of releasing greenbelt land. • Object to development on Green Belt land / removal of land from Green Belt.
4. Impact on the highway network / highway safety • Not against residential development here in principle, however, no development should be permitted until the Shipley Eastern Bypass has been completed or other major infrastructure work completed to the junction of Saltaire Road(A657), Bingley Road (A650) and Moorhead Lane. The junction is operating over capacity and cannot take any more traffic. • Additional population equals more traffic.

- Building more houses would put even more pressure on an area that is unable to cope with the amount of traffic passing through.
- New housing would see more cars parked and access would be via side streets.
- Will result in increased traffic on an already struggling transport link around Bradford Road and the Bankfield area.
- Road access.
- Traffic is bad enough through the day but worse at peak times.

5. Flood risk / drainage

- Flood risk would increase downhill / downstream from the site.
- Flooding in the area is already an issue and these developments would not improve the situation and adversely impact drainage.

6. Loss of greenspace

- Loss of local greenspace that is important to residents' health and wellbeing.

7. Loss of trees

- Loss of mature trees and woodland.

8. Impact on biodiversity / wildlife

- Needs a Preliminary Ecological Appraisal Report in order to appraise its biodiversity value.
- Should the site qualify as a Local Wildlife Site (LWS) it should be removed from the housing proposal as this would cause significant local habitat loss.

9. Impact on amenity

- Saltaire doesn't need any more cars driving through and impacting on air quality (already below standard).
- Increased air pollution and noise from additional cars / population – resultant negative impact on residents' mental and physical health.
- Loss of visual amenity for immediate residents and wider community.
- Is it ethical to build more dwellings in an area known for its high air pollution?
- Layout and density of building.
- Design, appearance and materials.
- Landscaping.

10. Impact on heritage:

- On the edge of Saltaire World Heritage site.
- Potential impact on character of Saltaire's high street.

- Effect on listed buildings and conservation area.
- An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.

11. Impact on local infrastructure:

- Schools already oversubscribed.
- Poor access to public transport (poor bus service) and local shops and services.
- Lack of infrastructure / services to support development.
- Impact on access to amenities for existing residents I.e. schools, health centres.

12. Other

- Impact on water quality.
- No environmental impact assessment.

Support:

1. **Proposed site allocation**:
   - Support for proposed site allocation.
   - Vacant brownfield.
   - Issues to be resolved including parking, traffic, biodiversity/wildlife.
   - Consideration to energy-efficient building construction, car-free development, provision of open space / greenspace, accommodation of trees.
   - Good access to infrastructure / amenities and public transport.

Comments:

1. **Flood risk / drainage:**
   - Site is located within Flood Zone 1 (FZ1).
   - Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 150, 384, 1227, 1294, 1333, 1466, 1468, 2352, 2601, 4121, 4396, 4767, 4931, 4962, 5131, 5139, 5429,5544, 5967, 5979, 28734, 29310, 30237

SH8/H - The Old School Building, Wrose Brow Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH8/H - The Old School Building, Wrose Brow Road	3	3	0	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Good site to repurpose for housing • Flood risk / drainage • Electricity cables	• This site is under construction and is identified as H1016 in the Regulation 19 Local Plan

Objections:

No representations received in objection.

Support:

1. **Proposed site allocation**:
   - This looks like a good site to repurpose for housing.

Comments:

1. **Flood risk / drainage:**
   - Site is located within Flood Zone 1 (FZ1).
   - Further guidance provided on flood risk mitigation measures and surface water discharge rates.
2. **Electricity cables:**
   - The proposed development site is crossed or in close proximity to National Grid assets. Guidance on development near National Grid assets Electricity assets & Gas assets is provided.

Representation IDs: 1228, 27759, 28735

SH9/H - Shipley Tax Office

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH9/H - Shipley Tax Office	21	20	3	15	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Objections** • Overdevelopment of area • Density too high • Impact on highway network / highway safety • Flood risk / drainage • Impact on amenity • Impact on heritage • Impact on local infrastructure • No environmental impact assessment. • Drainage and water quality. **Support** • Vacant brownfield site • Existing infrastructure. • Close to town centre • Not in the Green Belt. • Avoids impacts on woodland or wildlife • Large number of new homes in a desirable riverside location. • Should consider community space and retail; protecting public access to river; quality of development; impact on WHS / views into WHS; flood risk; housing mix and density; air quality; encouraging active travel; biodiversity / wildlife	• This site is under construction and is identified as H1062 in the Regulation 19 Local Plan.

• Sustainable location • Can be delivered within the plan period. • **Comments** • Impact on Leeds & Liverpool Canal • Flood risk / drainage • Impact on biodiversity / wildlife	

Objections:
1. Proposed site allocation: • Area is overdeveloped, housing density too high.
2. Impact on highway network / highway safety • Additional population equals more traffic. • Access is a problem - traffic feeds into the main road A6308
3. Flood risk / drainage • Located on flood plain, housing would exacerbate the problem.
4. Impact on amenity • Additional population equals more air pollution in an already over polluted area • Reduces amenity for walkers as it is so close to the river.
5. Impact on heritage • Impact on World Heritage Site buffer zone. • Historic England advised that before allocating this site for development: o An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance. o If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.

- If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).

6. Impact on local infrastructure

- Lack of infrastructure / services to support development.
- Impact on access to amenities for existing residents I.e. schools, health centres.
- Not close to shops and medical facilities.

7. Other

- No environmental impact assessment.
- Drainage may affect water quality in the area

Support:

1. Proposed site allocation:

- Support for proposed site allocation – vacant brownfield, existing infrastructure.
- Close to town centre – benefit for local businesses, amenities close to residents.
- Not Green Belt.
- Avoids impacts on woodland or wildlife
- Would provide a large number of new homes in a desirable riverside location.
- Any development should consider provision of community space and retail; protecting public access to river; quality of development; impact on WHS / views into WHS; flood risk; housing mix and density; air quality; encouraging active travel; biodiversity / wildlife
- Sustainable location and deliverable within the plan period.

Comments:

1. Impact on Leeds & Liverpool Canal:

- Site is located at a lower level than the adjacent canal and potentially vulnerable to flooding from any breach or leakage. Should be considered as part any flood risk assessment, including potential mitigation to reduce the risk in the event of a breach. Risk should be listed as a development consideration

• Need to ensure development does not result in land instability in relation to the canal embankment. Should be listed as a development consideration. • The development would introduce a significant new population next to the canal. Additional contributions would likely be required to prevent any deterioration of the towpath surface associated with additional usage. Should be listed as a development consideration. • Redevelopment of the site could alter outward views from the canal. Redevelopment should complement the canal corridor and Saltaire World Heritage Site Buffer.
2. Flood risk / drainage • Site is fully within Flood Zones 2 (FZ2) and 3 (FZ3) and contains small section of draft Flood Zone 3b (FZ3b)/current Flood Zone 3ai (FZ3ai). • No development should take place within draft FZ3b or current FZ3ai unless considered water compatible. Development should follow a sequential layout to prevent un-necessary development in areas within higher degree of flood risk. • Further guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required
3. Impact on biodiversity / wildlife • Site has potential for significant green and blue infrastructure improvements and opportunities for biodiversity net gain.

Representation IDs: 385, 1225, 1229, 2164, 2536, 2602, 4769, 4939, 4964, 5097, 5251, 5521, 5547, 5746, 5845, 5922, 13588, 18391, 28736, 29272, 29311

SH10/H - Land to north and south of Dockfield Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH10/H - Land to north and south of Dockfield Road	13	12	1	9	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Objections** • Flood risk: **Support** • Brownfield development. • Housing / mixed used development beneficial. • Good site for regeneration. • Will improve the area. • Flood risk • Infrastructure • **Comments** • Principle of allocation has previously been established. • Development constraints and considerations reflect those identified in AAP.	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1026) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:
1. Flood risk: • Site contains Flood Zones 2 (FZ2) and 3 (FZ3) as well as draft Flood Zone 3b (FZ3b)/current Flood Zone 3ai (FZ3ai).

- No development should take place within draft FZ3b or current FZ3ai unless considered water compatible. Development should follow a sequential layout to prevent unnecessary development in areas within higher degree of flood risk.
- Further guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required.

Support:

1. **Proposed site allocation**:
   - Support brownfield development.
   - Housing / mixed used development would be beneficial to this area of Shipley.
   - Good site for regeneration.
   - Will help improve the area.
2. **Flood risk**
   - Only support if riverside character is maintained and ecological and hydrological perspectives are at the forefront of further planning; otherwise, the flood risk is too great.
   - Reasonable area for development if flood risk is mitigated.
3. **Infrastructure:**
   - Site has good transport links and services.

Comments:

1. **Proposed site allocation:**
   - Principle of allocation has previously been established [Shipley and Canal Road Corridor Area Action Plan].
   - Support - development constraints and considerations reflect those identified in AAP.
2. **Impact on Leeds & Liverpool canal:**
   - Development considerations should include the risk of breach or leakage from canal (supported above the site by a shallow embankment) and the need for future planning applications to consider this risk within flood risk assessment.
   - Development considerations should include the following text: “Development will need to demonstrate that it will not adversely impact the embankment supporting the canal above the site”.
   - Support text in development considerations of need for the development to provide a high-quality frontage to the canal.

• The development would introduce a significant new population next to the canal. Additional contributions would likely be required to prevent any deterioration of the towpath surface associated with additional usage. Should be listed as a development consideration.
3. Impact on designated heritage assets: • The development of this area could harm elements which contribute to the significance of these designated heritage assets (Saltaire World Heritage Site, Leeds and Liverpool Canal Conservation Area, Leeds and Liverpool Canal Bridge Number 208).
4. Biodiversity: • Needs a survey for Japanese Knotweed • Must make full consideration of the value of Bradford Beck for biodiversity and green-blue infrastructure, as well as the wildlife habitat network – cannot be replaced, continuity of habitat is essential. • Protection of biodiversity and green-blue infrastructure along Bradford Beck; opportunity to achieve riverine BNG.
5. Other: • Red line plan drawn to accompany the description is inaccurately plotted and may need correcting.

Representation IDs: 143, 386, 1230, 2165, 4771, 4966, 5257,5729, 5923, 13591, 28737, 29273, 29314

SH11/H - Land around Crag Road Flats

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH11/H - Land around Crag Road Flats	5	5	3	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • **Objections** Greenfield sites so not sustainable • Brownfield sites must be used first. • Impact on amenity • Impact on open space • Impact on biodiversity • Impact on infrastructure **Support** • None received **Comments** • Impact on infrastructure • Flood risk	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1021) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:
1. Proposed site allocation: • Development is not sustainable on greenfield sites. • Plenty of brownfield sites that must be used first in line with CBMDC policy.

2. Impact on amenity: • Loss of amenity for local residents.
3. Impact on open space: • Pressure on open space in Shipley. • Small pockets of green open space should be maintained and improved for the sake of people's health and wellbeing. • Health and wellbeing impacts from loss of greenspaces however informal.
4. Impact on biodiversity: • Pressure on habitat in Shipley. • Loss of habitat and connectivity which should be enhanced.
5. Impact on infrastructure: • Site is crossed by / in close proximity to National Grid assets (275Kv underground cable).
Support:
No representations received in support.
Comments:
1. Impact on infrastructure: • Site is crossed by / in close proximity to National Grid assets (275Kv underground cable).
1. Flood risk: • Site is located within Flood Zone 1 (FZ1). • Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 144, 214, 27747, 28738, 30238

SH12/H - Crag Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH12/H - Crag Road	11	10	6	2	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Objections** • Suggesting another site • Impact on amenity • Impact on highway network • Impact on biodiversity / wildlife • Impact on open / green space • Impact on infrastructure • Impact on air quality **Support** • Principle of allocation has previously been established. • Development constraints and considerations reflect those identified in the Area Action Plan. • Brownfield site. • Affordable housing for local residents. • Impact on designated heritage assets **Comments** • Flood risk	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1046) is not carried forward as a preferred option for housing. • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B). • The site has been carried forward as a preferred option for employment (now referenced E159).

Objections:
1. Proposed site allocation: • Not opposing development on an area nearer Crag Road on opposite side to the Beck.
2. Impact on amenity: • Housing density is already too high – area is overdeveloped. • Loss of visual amenity for local residents and wider community.
3. Impact on highway network: • Will increase traffic • Road corridor already busy
4. Impact on biodiversity / wildlife: • Would result in major habitat loss with an associated major loss of local biodiversity. • It is grassland habitat network. • Several semi-natural habitats are present within this site, including grassland, tall ruderals, scattered and dense scrub, mature deciduous woodland and Bradford Beck. • East Field should be removed from the plan to show the importance of Nature Conservation. • Campaign to include a clause in the Environment Bill to give legal backing to more space for nature. • Must make full consideration of the value of Bradford Beck for biodiversity and green-blue infrastructure, as well as the wildlife habitat network – cannot be replaced, continuity of habitat is essential. • Protection of biodiversity and green-blue infrastructure along Bradford Beck; opportunity to achieve riverine BNG. • No environmental impact assessment. • May qualify as a Local Wildlife Site (LWS), passing the criteria used by West Yorkshire Ecology. • Preliminary Ecological Appraisal should be carried out before allocating. • Otters in the area. • Site should provide a buffer of at least 10m for a high-quality habitat and water corridor, re-naturalised beck. • Works should not cause deterioration of water quality, habitat and biodiversity.
5. Impact on open / green space: • Loss of green space.

- Part of the green infrastructure corridor and linear park from Bradford city centre to Shipley along Bradford Beck.
- Lockdown demonstrated the importance of natural world and green areas for walking, nature and mental health.
- Site should provide blue green infrastructure along beck for health and wellbeing.

6. Impact on infrastructure:

- Site intersects the Northern Gasworks High Pressure Pipeline and National Grid 275Kv underground cables.
- Guidance on development near National Grid gas and electricity assets provided.
- Lack of infrastructure to support development.
- Impact on access to services for existing residents (eg. Education, healthcare).

7. Impact on air quality:

- Increased traffic means more air pollution in an already over polluted area.

Support:

1. Proposed site allocation:

- Principle of allocation has previously been established [Shipley and Canal Road Corridor Area Action Plan].
- Support - development constraints and considerations reflect those identified in AAP.
- Brownfield site.
- Would like to see quality affordable housing for local residents.

2. Impact on designated heritage assets:

- The development of this area could harm elements which contribute to the significance of the Saltaire World Heritage Site.
- If there have been any significant changes to site circumstances since AAP allocation or development proposed is significantly different, a Heritage Impact assessment should be undertaken.
- Wording should be added to the development considerations: 'High quality architectural and sustainable design to contribute to the placemaking and sustainability principles, and safeguard and enhance the setting of the Saltaire World Heritage Site.'

Comments:

1. Flood risk:

- Site contains Flood Zones 2 (FZ2) and 3 (FZ3) as well as draft Flood Zone 3b (FZ3b)/current Flood Zone 3ai (FZ3ai).

- No development should take place within draft FZ3b or current FZ3ai unless considered water compatible. Development should follow a sequential layout to prevent unnecessary development in areas within higher degree of flood risk.
- Further guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required.

Representation IDs: 215, 2603, 4127, 5561, 5926, 6141,8124, 27758,28739, 29275, 29319

SH13/H - Regent House

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH13/H - Regent House	7	7	0	6	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Objections** • None received **Support** • Brownfield site • Not Green Belt • Use of former industrial sites for housing. • Dockfield Road area is all suitable for redevelopment. • Principle of allocation previously been established. • Development constraints and considerations reflect those identified in Area Action Plan. • Impact on biodiversity • Impact on designated heritage assets **Comments** • Flood risk	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H1047) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations received in objection.

Support:

1. **Proposed site allocation**:
   - Brownfield site
   - Not on Green Belt land
   - Support use of former industrial sites for housing.
   - Would like to see entire Dockfield Road area redeveloped – well served by road infrastructure, public transport, and active travel infrastructure.
   - Principle of allocation has previously been established [Shipley and Canal Road Corridor Area Action Plan].
   - Support - development constraints and considerations reflect those identified in AAP.
2. **Impact on biodiversity**
   - Will not disrupt wildlife
3. **Impact on designated heritage assets**
   - The development of this area could harm elements which contribute to the significance of designated heritage assets (Saltaire World Heritage Site, the Leeds and Liverpool Canal conservation Area, the Leeds and Liverpool Canal Bridge Number 208 (Grade II Listed Building)).
   - Heritage Impact assessment should be undertaken if there have been any significant changes to site circumstances since AAP allocation or development proposed is significantly different.

Comments:

1. **Flood risk:**
   - Site is fully within Flood Zones 2 (FZ2) and 3 (FZ3) and contains small section of draft Flood Zone 3b (FZ3b)/current Flood Zone 3ai (FZ3ai).
   - No development should take place within draft FZ3b or current FZ3ai unless considered water compatible. Development should follow a sequential layout to prevent unnecessary development in areas within higher degree of flood risk.
   - Further guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required

Representation IDs: 387, 2166, 4772, 5551, 5928, 28740, 29322

SH14/H - Market Hall

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH14/H - Market Hall	8	8	0	7	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Objections** • None received **Support** • Brownfield site. • Good location for regeneration. • Needs redevelopment. • Upper floors would help deliver housing • Improve the look of the town centre. • Suitable for mixed-use development. • Mixed-use development in town centre – introduces community back into area. • Live-work space • Principle of allocation has previously been established. • Development constraints and considerations reflect those identified in AAP. • Additional site suggestion - disused shops on A657. • Consultation • Impact on highway network • Impact on designated heritage assets • Retention of clock tower	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1048) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Comments	
• Flood risk	

Objections:
No representations received in objection.
Support:
1. Proposed site allocation: • Brownfield site. • Good location for regeneration. • Needs redevelopment. • Redevelopment of upper floors would help deliver housing and improve the look of the town centre. • Suitable for mixed-use development. • Support mixed-use development in town centre – introduces community back into area. • Support a mix of housing, community space, retail and hospitality, live-work space. • Principle of allocation has previously been established [Shipley and Canal Road Corridor Area Action Plan]. • Support - development constraints and considerations reflect those identified in AAP. • 1 specific additional site suggested: disused shops on A657.
2. Consultation • Must take into consideration the views of community in terms of how the space should be used.
3. Impact on highway network • Parking and traffic could be an issue.
4. Impact on designated heritage assets • The development of this area could harm elements which contribute to the significance of the Saltaire World Heritage Site.
5. Other • Would object if clocktower was lost – local landmark.

Comments:
1. Flood risk: • Site is located within Flood Zone 1 (FZ1). • Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 388, 1128, 4773, 4945, 4967, 5502, 28741, 29323

SH15/H - Buildings along Briggate

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH15/H - Buildings along Briggate	11	11	2	7	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Objections** • Impact on air quality • Green space **Support** • Use of brownfield sites for housing • Area needs redeveloping / regenerating • Mixed use • Buildings are run down / neglected • Principle of allocation has previously been established. • Development constraints and considerations reflect those identified in the Area Action Plan. • Canal side housing. • Use of site. • Impact on air quality • Impact on highway network • Biodiversity • Impact on designated heritage assets • Impact on amenity • Infrastructure	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1049) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Comments • Impact on Leeds & Liverpool canal • Flood risk	

Objections:
1. Impact on air quality: • Area needs redevelopment but is not suitable for housing due to location close to major junction with air quality issues.
2. Green space • Site would be better used for greenspace / community regeneration projects. • Residents want accessible green spaces among residential areas.
Support:
1. Proposed site allocation: • Support use of brownfield sites for housing • Area needs redeveloping / regenerating • Mixed use would be appropriate here • Buildings are run down / neglected • Principle of allocation has previously been established [Shipley and Canal Road Corridor Area Action Plan]. • Support - development constraints and considerations reflect those identified in AAP. • Canal side housing would be fantastic. • Needs using.
2. Impact on air quality: • Could result in increased air pollution on Briggate.
3. Impact on highway network: • Could result in increased traffic on Briggate.
4. Biodiversity: • Habitat for sand martins – development would need to mitigate impact. • Will not have a negative impact on the environment

5. Impact on designated heritage assets: • The development of this area could harm elements which contribute to the significance of these designated heritage assets (Saltaire World Heritage Site and the Leeds and Liverpool Canal Conservation Area).
6. Impact on amenity: • Would help with view of Shipley coming in on train
7. Infrastructure: • Existing infrastructure can accommodate residential development
Comments:
1. Impact on Leeds & Liverpool canal: • Development considerations in Local Plan should note that development would need to demonstrate the retaining wall next to the canal can accommodate additional loading without resulting in land instability. • Development considerations in Local Plan should reference need to adequately screen service areas and bin stores from the canal.
2. Flood risk: • Site is located within Flood Zone 1 (FZ1). • Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 145, 398, 1231, 3208, 4775, 4949, 5506, 5933, 13592, 28743, 29324

SH16/H - Market Square

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH16/H - Market Square	11	11	3	7	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Objections** • Loss of market square **Support** • Type and mix of housing. • Bring some life into the centre of Shipley. • Brownfield site. • Principle of allocation has previously been established. • Development constraints and considerations reflect those identified in AAP. • Regeneration • Car parking • Impact on biodiversity • Impact on designated heritage assets **Comments** • Flood risk	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1050) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

1. **Loss of market square:**
   - Object to loss of market square: valuable area for market traders and for residents of Shipley to meet and shop; provides a focal point.

- It is the open-air design of the market that makes it the heart of the town.
- Putting housing on the market square would completely destroy the character of Shipley town centre.

Support:

1. **Proposed site allocation**:
   - Would benefit from the right sort of housing.
   - Some dwellings in the area would help with the general emptiness at night and bring some life into the centre of Shipley.
   - Brownfield site.
   - Principle of allocation has previously been established [Shipley and Canal Road Corridor Area Action Plan].
   - Support - development constraints and considerations reflect those identified in AAP.
2. **Regeneration:**
   - Support mixed-use development in market square as area is in need of significant investment.
   - Support mixed-use regeneration; would like to also see green infrastructure, community space, new retail and leisure premises. Preferable to housing.
   - Market Square needs regeneration.
   - May improve viability of businesses in Shipley.
3. **Car parking:**
   - Parking could be an issue depending on the type of development.
4. **Impact on biodiversity:**
   - Would not impact on wildlife and nature.
5. **Impact on designated heritage assets:**
   - The development of this area could harm elements which contribute to the significance of these designated heritage assets (Saltaire World Heritage Site and Manor Lane Wesleyan Reformed Church (Grade II Listed Building)).
   - Heritage Impact assessment should be undertaken if there have been any significant changes to site circumstances since AAP allocation or development proposed is significantly different.

Comments:
1. Flood risk: • Site is located within Flood Zone 1 (FZ1). • Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 399, 472, 1232, 4776, 4959, 4969, 5509, 5908, 5916, 28744, 29325

SH17/H - Shipley Gateway Site

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH17/H - Shipley Gateway Site	6	6	0	4	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Objections** • None received **Support** • Derelict, previously developed site. • Put site back to use • Housing requirement. • Improve visual amenity. • Site being developed alongside Shipley Market Square and Indoor Market. • Mixed use development would encourage foot fall. • Principle of allocation has previously been established. • Development constraints and considerations reflect those identified in Area Action Plan. • Town centre needs updating to encourage people to use local shops. • Impact on designated heritage assets. **Comments** • Flood risk • Loss of parking	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1051) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:
No representations received in objection.
Support:
1. Proposed site allocation: • Derelict, previously developed site. • Redeveloping this site for housing would put it back to use, provide the required housing, and would improve visual amenity at the gateway to Shipley. • Would like to see this developed alongside Shipley Market Square and Indoor Market – mixed use development would encourage foot traffic as separate from central market area. • Principle of allocation has previously been established [Shipley and Canal Road Corridor Area Action Plan]. • Support - development constraints and considerations reflect those identified in AAP. • Town centre needs updating to encourage people to use local shops.
2. Impact on designated heritage assets • The development of this area could harm elements which contribute to the significance of the Saltaire World Heritage Site.
Comments:
1. Flood risk: • Site is located within Flood Zone 1 (FZ1). • Further guidance provided on flood risk mitigation measures and surface water discharge rates.
2. Other: • No objection to development but concerned about loss of parking.

Representation IDs: 400, 4777, 5939, 28590, 28745, 29326

SH19/H - Land between Leeds Road and Dock Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH19/H - Land between Leeds Road and Dock Lane	5	5	1	3	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objections • Impact on the highway network / highway safety • Climate change / emergency **Support** • Proposed site allocation • Site access • Infrastructure • Impact on designated heritage assets • **Comments** • Flood risk	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as H1052 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Impact on the highway network / highway safety: • Road network cannot cope with existing levels of traffic, never mind additional vehicles. • Shipley would be better served by investment in transport infrastructure.
2. Climate change / emergency:

• Does not respect the zero-carbon future Council policy.
Support:
1. Proposed site allocation: • Support redevelopment of site – prominent site which creates a negative impression in its current state. • Site is generally level and suitable for housing development. • Brownfield site in location suitable for residential development. • Principle of allocation has previously been established [Shipley and Canal Road Corridor Area Action Plan]. • Support - development constraints and considerations reflect those identified in AAP.
2. Site access: • Can be accessed from Dock Lane and A657.
3. Infrastructure: • Infrastructure should be able to support additional development.
4. Impact on designated heritage assets: • The development of this area could harm elements which contribute to the significance of these designated heritage assets (Saltaire World Heritage Site and the Leeds and Liverpool Canal Conservation Area).
Comments:
1. Flood risk: • Site is located within Flood Zone 1 (FZ1). • Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 401, 1233, 4778, 28746, 29327

SH20/H - Station Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH20/H - Station Road	4	4	0	3	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Objections** • None received **Support** • Shipley gateway enhanced. • Regeneration of Shipley town centre. • Principle of allocation has previously been established. • Development constraints and considerations reflect those identified in Area Action Plan. • Infrastructure • Impact on designated heritage assets **Comments** • Flood risk	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1054) is not carried forward as a preferred option and excluded. • Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:
No representations received in objection.
Support:
1. Proposed site allocation: • Enhancement of the gateway into Shipley should be encouraged. • Fully support the carefully-planned regeneration of Shipley town centre. • Principle of allocation has previously been established [Shipley and Canal Road Corridor Area Action Plan].

• Support - development constraints and considerations reflect those identified in AAP and include additional considerations.
2. Infrastructure: • Has access to public transport and services.
3. Impact on designated heritage assets: • The development of this area could harm elements which contribute to the significance of these designated heritage assets (Saltaire World Heritage Site and the Leeds and Liverpool Canal Conservation Area).
Comments:
1. Flood risk: • Site is located within Flood Zone 1 (FZ1). • Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 402, 5270, 28747, 29328

SH21/H - Wrose Brow Road, Windhill

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH21/H - Wrose Brow Road, Windhill	3	3	2	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • **Objections** • Impact on local infrastructure • Impact on environment • Impact on amenity • Impact on designated heritage assets • **Support** • None received • **Comments** • Flood risk	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as H1056 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Impact on local infrastructure: • Lack of infrastructure to support development. • Impact on access to services for existing residents (eg. Health and education)
2. Impact on environment: • No environmental impact assessment. • More traffic = more pollution. • Loss of greenspace.
3. Impact on amenity:

• Area is already overdeveloped. • Loss of visual amenity.
4. Impact on designated heritage assets: • Before allocation, an assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the designated heritage asset and the impact that development would have.
Support:
No representations received in support.
Comments:
1. Flood risk: • Site is located within Flood Zone 1 (FZ1). • Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 2605, 28748, 29329

SH22/H - Browfoot/Wrose Brow Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SH22/H - Browfoot/Wrose Brow Road	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on designated heritage assets: • Flood risk	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as H1056 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Impact on designated heritage assets:**
   - Before allocation, an assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the designated heritage asset and the impact that development would have.

Support:

No representations received in support.

Comments:

1. **Flood risk:**
   - Site is located within Flood Zone 1 (FZ1).
   - Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 28749, 29330

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 97 within the consultation document.

Summary of Consultation

A total of 36 representations were received in relation to Question 97 from 35 respondents. Respondents included Highways England, Incommunities, CPRE, Shipley Town Council, local residents and several landowners/agents. **Table 2.76.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 2.76.6**.

Table 2.76.5: Consultation Question 97: Shipley Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q97	36	35	35	2	3

Table 2.76.6: Consultation Question 97: Shipley Preferred Site Allocations - Summary of Representations Received

Consultation Question 97 – Shipley Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: **Objections** • Development of Green Belt land / Brownfield sites • Impact of local infrastructure • Flood Risk/Drainage • Loss of open space • Impact on highway network • Protecting the environment • Derelict Land & empty homes	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

• Amenity • Biodiversity and Green infrastructure corridors • Heritage • Loss of agricultural land • Landscape • Loss of green space & green corridors • Air pollution • Housing need • House value • Loss of trees • Health Impact • Road safety • Impact on water quality • Transport • Housing density • Objection to not allocating sites • Protection of watercourse • Protection of leisure spaces • Right of way **Support** • SH3/H • Sustainable settlements **Comments** • Impact on the highway network • Alternative / Additional sites	

Summary of Representations
Objections
1. Development of Green Belt land / Brownfield sites: • Green belt should be removed from the plan and brownfield sites built on first. • In Aireborough Neighbourhood Development Forum vs Leeds City Council, Mrs Justice Lieven found that it was wrong to leave Green Belt sites in a development plan solely to reduce the numbers around the district proportionately. • Green belt and any open land is a precious resource for people and wildlife. • Green Belt should not be built on. • The proposed developments in Nab Wood (SH4-6) are completely inappropriate. • Brownfield sites in Bradford and Shipley to use. • Build on ex commercial areas instead. • More affordable brownfield sites. • Green belt can only be used 'in exceptional circumstances',therefore not in line with national planning policy. • Change to the Green Belt boundary contravenes the National Planning Policy Framework Paragraph 136 - exceptional circumstances are fully evidenced and justified. • Inappropriate development is by definition harmful to the Green Belt. • As the last buffer of land between Cottingley and Shipley, it is important to maintain this open landscape. • A number of brownfield sites are proposed in the Plan in Shipley area which is welcomed. • Need to limit proposals to only develop/adapt existing brownfield and town centre sites for housing. •
2. Impact on local infrastructure: • Impact on local services, ie, schools, healthcare, doctors, road maintenance, public transport, waste collection. • The local infrastructure, particularly roads, cannot sustain new developments of this size. • Infrastructure cannot accommodate this amount of new homes. • Concerns about school catchment areas. • It is already impossible to get a Doctor's appointment. • Lack of NHS dentists locally. • Poor Public transport and amenities locally. • Schools- children in Nabwood often fall between schools. Increasing houses in both cottingley and Shipley will only make • this worse. Nabwood does not have a primary school. Children may need to be driven to school.
3. Flood risk/drainage: • Nab Wood is noted for its natural springs.

Summary of Representations
• Risk of increased flooding due to proximity of river, ground saturation. • Antiquated drainage/sewage systems. • Building on sites SH5/H and SH6/H will increase flooding. • High water tables means risk of flooding downhill/downstream. • Branksome Drive and Branksome Grove drains already overloaded due to many culverts under the existing properties. Area flooded in 2000 and 2015. In 2015 the flood water was over a metre high in the property. Land soaks up the top water and helps to alleviate the volume. • This area already suffers from existing water course issues. The existing flora in SH4/H slows and absorbs water, thus protecting the lower Aire around the river. • Area flooded in 2010. • Water from Cottingley flows by the Becks and in Jan 2020 the school was flooded, the water was under the school • coming through floor boards. • Sections of the land is within flood Zone 2.
4. Loss of open space: • Removal of known green space. • Parks and sports fields are not enough. • People living near • Wycliffe residents would have to go to Roberts Park or Northcliffe Park to get to a green space. • Visual value of open spaces will be lost. • Recreation open space like this is supposed to be protected. • Loss of the benefits of our community's local green space. • Children play regularly here and would have nowhere else to play. • Many dwellings in the neighbourhood have no gardens and the local parks are a long way away involving main road crossings. • It's used for sport/exercise, dog walking. • People travel via the green to work, or to the local nurseries and schools. • Area has been shown to be deprived of green space. • Loss of green space will only meet 3.5% of Shipleys housing quota.
5. Impact on highway network: • The additional number of vehicles accessing this quiet, well established estate. • Traffic generation • Road access

Summary of Representations
• Added traffic will also have detrimental effect on walkers and cyclists. • The main road through Shipley is the main route to Scotland for many Bradford Hauliers. • Branksome Grove will not cope with the extra traffic. • Bankfield Rd, Glenview Rd & Glenview Drive are not suitable to cope with the extra traffic 160+ houses will generate. • This area is a rat run at school times. • Building and extension works in this area creates a sea of Contractor vehicles. • Road through Saltaire is already saturated with traffic. • Access to some of the proposed sites is restricted. • Likely to increase traffic to access services due to the location.
6. Protecting the environment • There are enough sites in the district to build on which don't compromise the environment. • Environmental impact. • Does not respect the zero-carbon-future Council policy.
7. Derelict Land & empty homes • Bring back into use the derelict building sites and empty houses/buildings.
8. Amenity • Noise and disturbance. • loss of privacy and daylight.
9. Biodiversity and Green infrastructure corridors • Loss of trees loss of nature conservation. • Loss of species habitats, especially bat colony. • Degrade habitats. • We need wildlife for survival. • Loss of natural habitat and food sources for bats, badgers, deer, bird life, moths, butterflies, owls, amphibians and reptiles, otters and kingfishers, weasels, squirrels, rabbits, foxes and herons and many species of birds nesting in the trees and hedges. • Negative impact on BMDC's Biodiversity Policy and Green Infrastructure Corridors. • Noise and air pollution harmful to wildlife.

Summary of Representations
10. Heritage • Effect on listed buildings and conservation areas. • Historical importance. • Need to protect our heritage such as New Close Farm. • No heritage sites should be developed until all other options have been suitably utilised. • Protection of ancient fields
11. Loss of agricultural land
12. Landscape • Loss of views of and interaction with countryside • An area of outstanding natural beauty should not be destroyed.
13. Loss of green space & green corridors • Deficiency of green space. • Deficiency of land in green corridors. • Help improve air pollution. • No good having everything crammed in the centre with green areas surrounding it. • There are few green spaces within walking distance. • This open space has been an essential space to use in lockdown. • The sites provide leisure spaces and enable a healthy commuting/walking route to Bingley which avoids the polluted main road.
14. Air pollution • Added traffic would create more air pollution. • The pollution levels in this area are high. • Increasing air pollution goes against world-wide policy. • Loss of protected woodland means rise in carbon dioxide because not absorbed and stored by trees. • Bradford Road already is level 3 air pollution • Air and noise pollution from Cottingley New Rd and Bingley Rd is already a concern. • Children at risk due to air pollution. • SH4/H is proposed for land which is expected to be within a Proposed Clean Air Zone, SH5/H and SH6/H are also proposed to be, at least in part, within the Proposed Clean Air Zone. • Green spaces help protect against air pollution.

Summary of Representations
15. Housing need • How were figures calculated. • Need to account for pandemic deaths and fall in birth rate and change in population due to Brexit. • Need to wait for census figures.
16. House value • Loss in value to existing houses is not acceptable.
17. Loss of trees • Ancient trees in area. • Woodland along sites boundaries.
18. Health Impact • Resident's physical and mental health negatively impacted. • Rise in vehicles idling, whilst waiting to join already highly polluted roads aggravates asthma, COPD and all respiratory diseases. • Loss of Green Belt which is used by families for Mental & Physical wellbeing. • A healthy walking option to Bingley should not be compromised. • Mental health and physical well-being should be at the heart of planning.
19. Road safety • Bradford road is dangerous. • Bankfield road is an accident black spot in winter. • Children at risk due to traffic queues and non-moving traffic. • Increased danger to children, as traffic spills over from the main roads.
20. Impact on water quality
21. Transport • Some sites proposed have no bus route.

22. Housing density

- A density of around 26dpha is much lower than the HO2 minimum of 35 dpha, and even more inconsistent
- with policies SP4, SP5 and SP8.

23. Objection to not allocating sites

- Objection to the failure to allocate sites SH/044 and SH/048 for housing development, as one combined site.

24. Other

- Protection of watercourse
- Protection of leisure spaces
- Right of way

Support

1. SH3/H

- Support SH3/H which will assist in securing the objectives of the Shipley Local Area Strategy and provide the opportunity to contribute to the creation of sustainable communities through environmental, physical and social regeneration in the form of new housing.

2. Sustainable settlements

- Shipley and Saltaire are considered sustainable settlements for housing growth, with a range of facilities and amenities.
- Highly accessible by public transport.
- Connectivity to towns/cities will allow future residents access to excellent employment opportunities

Comments

1. Impact on the highway network:

- It is not considered that locating development within the settlements within Shipley, on their own, will have a severe impact on the capacity, operation and safety of the Strategic Road Network, (SRN). However, the quantum of sites forms part of a wider cumulative impact within Shipley and the rest of the development aspirations within the Plan could severely impact the SRN, and this cumulative impact will need to be established by the Council and considered by Highways England.

2. Alternative / Additional sites

- A number of disused shops or buildings on the A657 (Saltaire Road).
- Shipley Hospital – which is due to close
- Land that housed the Oddfellows Pub on Otley Road
- Land that housed the Branch Pub on the corner of Otley – which is owned by the Council

• Wharf Street Carpark • Land behind the Aldi Supermarket • Underutilised car park on St Paul's Road, Shipley • Underutilised office space on St Paul's Road, Shipley • Unused car dealership/garage on Saltaire Rd/John Street opposite Wycliffe flats. • Land next to the new Fire Station on Canal Road • The draft Plan should also take into account the availability of 'retail and office space' in and around Shipley town centre in light of likely changes to working arrangements post Covid-19 and reflecting PD rights changes.
3. Recreation grounds access • Development of shops and disused buildings on Saltaire road could open up another access to the bottom of Crowgill Park, a recreation area that is currently under-used due to its isolated feel.
4. Tree planting in the Aire Valley • Particularly for SH5/H, SH6/H and the watercourses higher up at SH4/H. The existing flora and fauna would have to be taken into consideration.

Representation IDs: 3 370, 377, 463, 671, 683, 751, 804, 1216, 2149, 2210, 2805, 2847, 3612, 3808, 3880, 4203, 4211, 4516, 4536, 4615, 4749, 5105, 5367, 5475, 5805, 6744, 6751, 15444, 16742, 17096, 21058, 24692, 27462, 28533, 30248

2.77 BAILDON

Introduction

The Local Plan settlement hierarchy identifies Baildon as a Local Service Centre. The District's Local Service Centres form the fourth element of the settlement hierarchy in the local plan (Policy SP3) and provide services and facilities that serve the needs of, and are accessible to, people living in the surrounding rural areas. Based on this it is proposed that the settlement has a housing target of 250 dwellings. A total of six site allocations (all residential) were proposed to deliver the development requirement.

Portrait & Local Area Strategy

The Local Plan provides a portrait of the Baildon's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as question 98 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **33** representations were received in relation to the Baildon portrait and Local Area Strategy (Question 114) from **31** respondents. Respondents included Highways England, local residents, the NHS, a housebuilder, a Member of Parliament and a Ward Councillor. **Table 0.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.2**.

Table 0.1: Question 98: Baildon Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
98	Baildon Portrait & Local Area Strategy	33	31	26	2	5
	Totals	**33**	**31**	**26**	**2**	**5**

Table 0.2: Baildon Portrait & Local Area Strategy - Summary of Representations Received

Baildon Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
98	Baildon Portrait & Local Area Strategy	33	31	26	2	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objections to development on the Green Belt and concerns due to difficulty in providing sustainable new Green Belt boundaries. • Concerns regarding impacts on local infrastructure and services • Objections to proposed level of housing growth • Overall housing distribution • Location of site allocations • Concerns with impact on biodiversity/wildlife • Objections relating to impact on the highway network • Planned developments are not consistent with elements of the Local Area Strategy • Housing densities are inappropriate • Concerns raised regarding the lack of affordable housing and types of houses to serve local needs • Impacts on designated heritage assets from proposed developments • Impacts on leisure and recreation including open space and Rights of Way • Objections due to flood risk and drainage impacts	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BA1:Baildon, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Objections regarding the provision of economic development opportunities • Settlement boundary and reasoning behind lower Baildon being included as part of Shipley settlement • Concerns over provision of Gypsy and Traveller accommodation when the Esholt Site is listed as being only partially used • Local Area Strategy approach broadly supported • Support for the strategy aimed at ensuring development conserves and enhances heritage assets and their settings including the Saltaire World Heritage Site welcomed. • Plan should centre on building communities, rather than focussing on housing delivery. • The strategy should create opportunities for business • Local Area Strategy not consistent with Council ambitions to improve the health and wellbeing of the District's population and tackle air pollution.	

Representation IDs: 16, 232, 465, 626 ,819 ,865, 888, 1000,1863, 2421, 2928, 3191, 3517, 3629, 5115, 5673, 5971, 6328, 8422, 9713, 9887, 11481, 15445, 16102, 16272, 23675, 24904, 28556, 28564, 28581, 28582, 29101, 29134, 29596

Sites

As highlighted above, six sites were put forward in the Preferred Options document to meet the proposed development requirements for Baildon (6 for residential. Under Q115 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **526** representations were received in relation to policies BA1/H to BA6/H from **516** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents and a Ward Councillor. **Table 77.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 77.4**.]

Table 77.3: Baildon Proposed Sites (BA1/H to BA6/H) – Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BA1/H: Stubbings Road	32	32	26	1	5
BA2/H: West Lane	153	151	141	4	8
BA3/H: Cliffe Lane West	12	12	6	4	2
BA4/H: Green Lane	33	32	27	4	2
BA5/H: Meadowside Road, West of Baildon CE Primary School	146	143	141	2	3
BA6/H: West Lane	150	148	140	3	7
Totals	**526**	**516**	**481**	**18**	**27**

Table 77.4: Baildon Proposed Sites (BA1/H to BA6/H) – Summary of Representations Received

BA1/H: Stubbings Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BA1/H: Stubbings Road	32	32	26	1	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Level of housing growth • Previous planning history • Housing mix • Development of Green Belt land • Impact on amenity • Consistency with policy • Impact on character • Impact on the highway network • Site access • Impact on local infrastructure/services • Impact on biodiversity/wildlife • Loss of green spaces • Flood risk/drainage • Impact on recreational activities/tourism • Impact on Saltaire World Heritage Site (WHS): • Support for proposed site allocation • Impact on Public Right of Way network	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H55) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

• Impact on trees	

Summary of Representations
Objections:
1. Level of housing growth: • Baildon had been subject to significant development in recent years. Further growth would be over-development of the town. Additional housing not required or necessary. • Site's immediate surrounding area has enough houses. • An existing dwelling would need to be demolished to gain access to the site, meaning a net gain of only 4 dwellings. No need to demolish a perfectly good house to build 5 expensive ones. • A developer would want to build more than 5 dwellings, as demonstrated by a previous withdrawn planning application for 14 dwellings. Previous submissions made for 20 dwellings. • Growth beyond normal demographic growth cannot be supported.
2. Previous planning history: • Arguments by the community and statutory/public consultees against a previous application for 14 large dwellings (with access from Walker Wood) resulting in it being withdrawn. • Particular issues raised included bad access, flooding/drainage, impact on World Heritage Site, parking, trees/woodland and nature impact as well as spoiling the area via over population. • Previous objections raised by the community, statutory bodies and World Heritage Office should be revisited before the site is considered for allocation.
3. Housing mix: • Dwellings would be unlikely to be affordable. • Larger detached properties considered to be un-necessary.
4. Development of Green Belt land: • Objection to the development of Green Belt land. • Plan considered to provide a lack of protection for Green Belt land. • Protecting it would be line with Local Area Strategy in terms of "*protecting and enhancing existing open spaces and green areas, networks and corridors…*"

Summary of Representations
• Green Belt viewed as important to the community and visitors, and their health and wellbeing. • Queried why brownfield land was not being used and that it should be prioritised ahead of Green Belt. Highlighted that there are many suitable non-Green Belt sites that could be accessed. • Green Belt should be cared for and allowed to thrive for future generations.
5. Impact on amenity: • Will result in a loss privacy to properties on Stubbings Road (a private road). • Access can only be achieved by knocking down an existing dwelling causing noise and disturbance to each of the houses that are adjacent to the property that is proposed to be demolished**.**
6. Consistency with policy: • Development would be contrary to Council's position of building on brownfield land as well as target of being carbon neutral especially if trees are removed. Alternative options have not been sufficiently considered. • Need to consider climate change and environmental impacts of new housing.
7. Impact on character: • Development would impact on the village feel and community of Baildon • Concerns expressed regarding the impact of previous and future development on the character of Baildon.
8. Impact on the highway network: • Development would lead to an increase in traffic, noise pollution and congestion. Would be an issue for the West Lane area as well as the roads through the centre of Baildon. • Considered that Baildon's road infrastructure could not sustain more housing as it was already heavily congested. Already too many houses for the existing network. • Additional traffic would impact on the single main route to/from Baildon, affecting daily commutes to work and school. • Increased traffic caused by construction vehicle to gain access to build a small number of houses is not justified. • Construction traffic would impact on the surrounding environment.
9. Site access: • Access to the site felt to be very poor. Increased traffic required for construction traffic • Access can only be via Woodlands Drive – a route taken by Salts School pupils walking to/from school. Would be a major safety issue as the roads are blind onto Lucy Hall Drive.
10. Impact on local infrastructure/services:

Summary of Representations
• Local infrastructure unable to sustain more housing. No infrastructure is in place to serve the site. • Public transport provision (bus services) considered to be poor, whilst schools, GPs and dentists were oversubscribed. • Local schools in Baildon, including the nearby Sandal Primary School considered to be over-subscribed and unable to sustain more housing. • Plan should include more information/detail about school capacity as it was essential information, particularly given the SA conclusion that development have a major positive impact on education. • Major positive effect insignificant in comparison to loss of greenfield land. • Access to local secondary highlighted as being via poorly lit bridleway. • Area lacks shops, meaning residents have to use the car to reach them. • Site lacks a sewage network. • Despite significant development in the Canal Road Corridor and Shipley, no action had been taken to increase school places and health services or to improve the road and rail networks.
11. Impact on biodiversity/wildlife: • Site located within the vicinity/immediately adjacent to a Local Wildlife Site (LWS), which is also an Ancient Woodland and a Priority Habitat. • Development would encroach into these areas, leading to a loss of wildlife habitats, impact on wildlife and causing damage to and/or loss of Ancient Woodland. • Presence of Ancient Woodland means the site should not be allocated. Ancient Woodland should be protected and trees granted Tree Preservation Orders. • Site adjacent to/forms part of an important wildlife corridor. Allows animals to move between Walker Wood and Baildon Moor. • Secondary woodland should be retained to ensure ecological networks are maintained/enhanced. • Public access to the woodland would be restricted.
12. Loss of green spaces: • Loss of green spaces would have a major effect on wildlife and impact the general wellbeing of the community. • Should be protected without exception
13. Flood risk/drainage: • Concerns over the impact on development on the watercourse flowing through the site, which has a history of flooding. • Concerns that removal of trees would lead to more flooding on the site and to adjacent properties.

Summary of Representations

- West Lane and Lucy Hall Drive have significant issues with surface water run-off, whilst there are drainage issues with Honey Pot Lane development.
- West Lane sites provide natural drainage for Baildon Moor.
- Any development would need to provide appropriate drainage.

14. Impact on recreational activities/tourism:

- Site provides an important recreation area for cyclists and walkers
- Development would impact negatively on tourism. Site considered to be one the good areas left in the District for people to visit.

15. Impact on Saltaire World Heritage Site (WHS):

- Site within the Saltaire World Heritage Site (WHS) buffer zone.
- Development would have a negative effect on the WHS.
- Objections submitted on previous application relating to impact on the WHS should be taken into consideration.
- Before allocation, an evaluation should be undertaken of what impact development would be likely have upon those elements that contribute to the significance of Saltaire WHS.

Support:

1. Proposed site allocation:

- Conditional support, due to potential access constraints from Stubbings Road.
- Access via Walker Wood could damage ancient woodland and impact on an area that has been objected to previously.

2. Proposed level of growth:

- Concern that the proposed allocation would allow developers to bring forward proposals for additional dwellings.
- Needs to be prevented to protect woodland.

Comments:

1. Impact on Public Right of Way network:

- Green buffer protecting the existing path along the top of Walker Wood should be created. Path is a well-used route between the centre of Baildon and Shipley.
- An additional path should be creating within any new development to allow walker access it from West Lane.
- Suggested that path could be improved using s.106 monies arising from the site's development, allowing it to become a multi-user route.

Summary of Representations
2. Proposed site access: • Site access should not be taken from the surrounding roads (Woodlands Grove and Walker Wood or Westleigh and Glen Rise) as it would involve demolition of existing properties. • Roads are narrow with on-street parking, making it difficult for larger vehicles to navigate. • Best option for access would be from Stubbings Road. Would have minimal impact on existing properties. • Stubbings Road was previously an access/right of way for farm vehicles. • Recent developments meant that 5 dwellings being served by Stubbings Road could not be refused due to minimal impacts.
3. Impact on trees: • Suggested that some of trees within the site should receive TPO designation.
4. Previous planning history: • Site subjected to several withdrawn planning applications, most recently for 14 dwellings with access from Walker Wood. • Still a number unresolved issues/objections raised relating to access, impact on wildlife and flooding.
5. Flood risk/drainage: • Site is located within Flood Zone 1 (FZ1) • Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 627, 796, 823, 1015, 1166, 1192, 1244, 1377, 2889, 3192, 4051, 5246, 5426, 5683, 5768, 6331, 6405, 8102, 9714, 11464, 12916, 13080, 13463, 18247, 18544, 19534, 24682, 25457, 28558, 28566, 28750, 29331

BA2/H: West Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BA2/H: West Lane	153	151	141	4	8

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Green Belt Assessment • Consistency/compliance with policy • Site boundary • Location of development • Overall level of development • Impact on the highway network • Impact on the transport network • Impact on local infrastructure/services • Impact on character • Impact on green space/open space • Impact on leisure/recreation • Impact on landscape • Impact on visual amenity • Impact on amenity • Flood risk/drainage • Ground conditions • Impact on pollution • Impact on biodiversity/wildlife • Impact on trees/hedgerows • Loss of agricultural land	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H56) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

• Impact on Saltaire World Heritage Site (WHS) • Housing design • Housing mix • Sustainability • Deliverability/Community Engagement • Support for site allocation and amendment to boundary	

Summary of Representations
Objections:
1. Development of Green Belt land: • Site is located within the Green Belt, which had been designated for a particular reason – to prevent urban sprawl. • Should not be allowed to be developed or encroached upon and retained and protected for its intended purpose instead. It should also be protected for future generations to enjoy. • Concern over the lack of protection for Green Belt within the Plan. • Green Belt boundaries could only be altered in "exceptional circumstances". No evidence provided to demonstrate that there were "exceptional circumstances" why the fields should be removed from the Green Belt. Suggested that such circumstances did not exist. • Area was one of the last remaining Green Belt areas in Baildon and important to the settlement's character. • Would lead to urban sprawl and a major impact on openness as well as resulting in the area becoming highly built up, closing the gap between Honey Pot Lane and Dene Hill. Would a continuous stretch of housing on both sides of the road between the centre of Baildon and Shipley Glen. • Would leave no green space and set a precedent for development on remaining fields in the area as well as have no benefit for the community.
2. Green Belt Assessment: • Reference was made to the conclusions for the Green Belt Parcel Assessment and Site-Specific Green Belt Assessment, some of which were challenged. • Site noted as being located in a "major" parcel of Green Belt. • Site's overall Green Belt impact should be classed as "major" rather than "moderate". • Would have a "major" impact on sprawl rather than a "moderate" one.

- Absurd to suggest that stronger Green Belt boundary could be created by encroaching into it. Any new boundary would be weaker as it would use less defined features.

3. Consistency/compliance with policy:

- Site should be protected to comply with the Local Area Strategy aim of "*Protecting and enhancing existing open spaces and green areas, networks and corridors including the urban fringe to enhance biodiversity and recreation within and adjacent to the settlement as well as incorporating sufficient green space*"
- Site meets the purposes of Green Belt set out in national policy, in particular *"to assist in safeguarding the countryside from encroachment*" and "*to check the unrestricted sprawl of large built-up areas*".
- Contravenes a core principle of the Council's Sustainable Development Plan – "Living within Environmental Limits".
- Would not meet the Local Plan's overarching environmental objective of enhancing or protecting the environment including value landscapes.

4. Site boundary:

- Western and eastern boundaries of sites BA2/H and BA6/H should be amended to allow for a significant degree of openness and to demonstrate a link between the urban area and the countryside.
- Would result in a need to find additional land elsewhere in Baildon for 40 to 50 dwellings.

5. Location of development:

- Considered that the Plan approach was not "sound" in terms of meeting the requirements of National Planning Policy Framework (NPPF).
- Are many non-Green Belt sites suitable for development in the Baildon area that had not been taken into consideration in the Plan to meet housing needs.
- Housing should be focussed in other locations with the use of brownfield sites, together with derelict land and buildings being prioritised in all cases or before using/allocating Green Belt and/or greenfield land including the proposed sites BA2/H & BA6/H
- Were plenty of brownfield sites available that had not been considered for inclusion within the Plan in Baildon, Bradford and Shipley as well as in the Airedale corridor that could be developed or redeveloped. Using such sites, would not be detrimental and could enhance the wider area as well as allowing Green Belt/greenfield sites and open spaces to be protected.
- More effort should be placed on finding brownfield sites and developing them first.
- Queried why brownfield sites were not being used in Baildon as development of greenfield land would have an impact and why brownfield land was not being prioritised.
- Brownfield sites were likely to be distributed to and situated in locations where they could take advantage of transport links and provided access to the amenities and schools that future residents will need.

- Several suggestions made as to the sort of brownfield sites that could be used. This included using/repurposing former commercial and retail premises made redundant by changing working and shopping patterns and the COVID-19 pandemic.
- Other locations suggested include Bradford City Centre and the inner city which is in need of large scale regeneration and improvement.
- In Baildon, the industrial/employment area around Otley Road or other sites such as the Ian Clough Centre should be considered. Baildon Mill was viewed as a site that is ready for development.
- Noted that the Bradford Council area would be part of a review by the West Yorkshire Combined Authority (WYCA) that will likely result in further parcels of non-Green Belt land becoming available in the near future for development, meaning that there was no need to remove sites from the Green Belt to meet housing targets

6. Overall level of development:

- Concerns over the level of development proposed for the Baildon, in particular in the West Lane area.
- Baildon had seen significant development in recent years, some of which resulted in the loss of greenfield land. The area had become overdeveloped with housing.
- Further housing was not needed. Area already had too many dwellings for the local road network to cope with. Any population growth beyond normal demographic growth could not be supported.
- Queried why land for 217 dwellings had been identified when the residual requirement was 170 dwelling, after those dwellings with planning permission had been discounted.
- Large scale development had taken place in Shipley and the Canal Road area, but not action had been taken to enhance infrastructure (school places, health services, road/rail networks)
- West Lane had seen significant development in recent years, creating overdevelopment. Recent development should not set a precedent for more.
- Further development would damage the West Lane area.
- 127 dwellings considered to be too may for West Lane and would mean that more than half of the settlement's requirement being provided in one area. Would be disproportionate.
- Sites BA2/H & BA6/H should be considered as a single site.

7. Impact on the highway network:

- Concerns expressed over the impact of further development on the highway network near the site and in the wider Baildon area, together with its ability to cope.
- Further concerns raised in relation to the impact on safety of road users and pedestrians that may arise.
- Would be an increase in traffic using the roads, particularly West Lane and the main routes in/out of Baildon, causing increase pressures on the network, more congestion, more delays, more noise, pollution and a reduction in air quality.

- West Lane noted as a busy route through the area, becoming a “bottle neck” at certain times of the day, in particular school pick up/drop off times. It also suffers from speeding vehicles. Development would add further traffic to West Lane and exacerbate existing issues and create more standing traffic.
- West Lane suffered poor visibility and limited pavements, generating risks to pedestrians and motorists due to increased traffic.
- The road serves Sandal Primary School that has issues with congestion and parking. More traffic would increase risks to the safety school children.
- Highway network in Baildon considered to be at capacity and unable to support development and the increase traffic that it would create. It is inadequate with no further capacity.
- Major improvements to the network would be needed to accommodate development.
- Baildon has one main access route leading from the town centre towards Shipley. It becomes congested at peak times, affecting West Lane. Development would exacerbate this problem and increase delays.
- Baildon roundabout, junction of Baildon Road/Otley Road and the river crossing to Shipley noted as a key pressure points. A6038 was heavily used and would need to accommodate traffic arising from developments in Wharfedale.

8. Impact on the transport network:

- Public transport provision limited and poor quality – only one bus per hour. Means that residents will use cars to travel to work and elsewhere adding to congestion and pollution. Also a lack of services to Guiseley, Ilkley and Otley,
- Access to Saltaire railway station is difficult via a steep bridleway/path. Would dissuade potential passengers from using the train. Baildon station noted as being distant from the site (2 miles and 25/30 minutes’ walk) with insufficient parking and no direct services to Leeds.
- Guiseley and Shipley stations were potential alternative options but also had limited parking.
- Unrealistic to assume residents will walk or cycle to access services and facilities, whilst they would not use public transport. Buses empty and people drive short distances to schools.

9. Impact on local infrastructure/services:

- Ability of local infrastructure, services and amenities in Baildon to support further development was questioned. Plan had not addressed or considered the need for additional infrastructure.
- Existing infrastructure – schools, health services, dental services and other public services/amenities – was insufficient to cope with more residential development.
- Residents already experience issues accessing services/facilities with West Lane lacking amenities. Further development would increase strains and pressure on infrastructure.
- Schools (primary and secondary) considered to be at capacity and/or oversubscribed with no places available for additional pupils.

- Sandal Primary School has no places and would need investment to expand to accommodate more pupils. A similar issue affects Titus Salt School – the nearest secondary school.
- GP/medical services were also considered to be at capacity and insufficient to meet current and future needs. Baildon noted as having two GP surgeries for its current population. Pressure would be placed upon them, impacting current patients. Dental services had no vacancies.
- Pressures would be placed on other Council/public services e.g. waste collection/disposal, highways, parking and policing as well as the utilities networks (water supply, drainage, power supply). The latter, especially water, were considered unreliable.
- Area lacked children's playgrounds.
- Town centre had experience the loss of a range of shops and services. Development may have a further impact on its vitality and viability. Other concerns related to the loss of community facilities e.g. the local library and the Ian Clough Hall.
- Water supply would need to be upgraded and local amenities to support developments provided and guaranteed.
- Had been a general lack of investment in infrastructure and amenities in recent decades.

10. Impact on character:

- Baildon considered to be a small town and not able to accommodate more residents. Development would bring overcrowding. Area was already heavily built up.
- Would result in the loss of Baildon's village/semi-rural feel with it becoming more urbanised. A degree of community identity would be lost.
- West Lane sites (BA2/H & BA6/H) together with the Moors and green spaces considered to represent a key part of the settlement's character.
- Existing development was not in keeping with the settlement's character.
- Maintaining green spaces on West Lane and retaining the land considered vital and having value for the aesthetics of the area. Noted as being the last remaining area of green space in the a rea.
- Development would create sprawl along both sides of West Lane changing its character and affecting the natural beauty of the Moor and the appearance of the area as well as a negative effect on the community.
- Suggested that the site would be natural infill and better than some of the other sites proposed.

11. Impact on green space/open space:

- Retaining areas of open space in the locality was important.
- Area represents one of the last remaining green spaces along West Lane, providing a key break between existing residential areas. Was also a welcome space for the community's enjoyment and their health and wellbeing.
- Development would remove the open space and key green lung, resulting in ribbon development with a detrimental effect on the community.

- Would be contrary the Plan's aim to protect/enhance open spaces and green areas.
- Baildon Moor should be protected for future generations.
- Area does not have enough green spaces.

12. Impact on leisure/recreation:

- Site's surrounding area is valued and well-used by the community and visitors for leisure and recreation purposes, in particular walking and enjoyment of the countryside.
- Site located close to several Public Rights of Way running across Baildon Moor. Walkers also use West Lane/Lucy Hall Drive to reach Bracken Hall Green and Shipley Glen.
- Would be a negative impact on views from these walking routes and on the openness of the area, spoiling its amenity and damaging a beauty spot as well impacts on health and wellbeing.
- Green spaces should be maintained to continue to provide offer opportunities for leisure, recreation and relaxation, and benefit the health and wellbeing of local people and visitors.
- Potential impact on nearby caravan park.

13. Impact on landscape:

- Would be significant negative impact on the landscape and its setting as well as being visually damaging.
- Area was part of a valued landscape – the last green buffer between the built up area, Shipley Glen and Baildon Moor and visual connection with the moors. Was part of the area's agricultural character.
- Should be protected, whilst there was a view that the landscape was an area of outstanding natural beauty.
- Landscape is varied, visually stimulating and open, providing enjoyment for the community.
- Site rises steeply towards Baildon Moor, meaning that there would an impact on the wider Aire Valley.
- Would be impossible to develop on the site in a manner that was sympathetic to the surrounding area.

14. Impact on visual amenity:

- Would be impacts on visual amenity, views and vistas, together with the community's enjoyment of them.
- Impacts would be felt in the immediate surrounding area as well as over longer distances.
- Views of the Aire Valley and the countryside from adjacent residential areas would be lost or damaged.
- The open aspect of the and views towards Baildon Moor from West Lane would be obscured. Views from upper sections of Baildon Moor would be severely impaired or reduced due the site's prominence in the landscape. Could include impacts on views to/from the Saltaire World Heritage Site.

15. Impact on amenity:

- Existing residents would be impacted upon negatively, particularly during the construction phase due to increased traffic and pollution levels.
- Property values would be negatively affected.
- Residents and visitors would be affected by a change in character of the area to a more urban form.
- Neighbouring properties would experience a loss of light and privacy as well as restricted views and overlooking.

16. Flood risk/drainage:

- Site is prone to flooding and provides route for water running off the nearby moors. It also plays a role in holding and managing the water from the moors, giving a degree of protection to nearby properties and infrastructure. Should be retained as green space to continue this role.
- Site contains several natural springs and watercourses.
- West Lane has experienced issues with flooding due to surface water run-off and the watercourses, particularly during periods of heavy rain.
- Development would increase the risk of flooding to the surrounding area and spread the effect to other areas. New and existing properties would also be affected.
- Would be a reduction in natural drainage and water storage, whist the springs and watercourse could be disrupted/rerouted causing more issues. These had already been affected by recent development.
- There would be more pluvial flooding and surface water would flow off the site faster. Loss of trees would increase flooding.
- Drainage network was unable to cope with existing water flows. Development would add to these problems.
- Improved drainage systems would need to be put in place and surface water issues dealt with.

17. Ground conditions:

- Concerns expressed over the stability of the ground to support to development.
- Parts of the site noted as being boggy due to presence of springs and watercourses.

18. Impact on pollution:

- Development would lead to increase levels of pollution for a range of sources including air pollution, noise pollution, light pollution, as well as an adverse impact on air quality.

19. Impact on biodiversity/wildlife:

- Would be a significant negative impact on local wildlife and biodiversity, as well as the countryside and landscape more generally.
- Site should not be developed and retained/protected as green space including to support wildlife.
- Site noted as being home to a range of animals, birds, insects and plants – some of which are considered to be “at risk” or “endangered” – as well as habitats that support them.

- Bats, bees, buzzards, curlew, deer, duck, fieldfares, foxes, geese, herons, kestrels, lapwings, owls and pheasant present in the area.
- Development close to the moors will inhibit and reduce the environment that supports wildlife via loss of biodiversity, habitats, feeding grounds and nesting grounds. Wildlife would be displaced.
- Site within close proximity to the South Pennine Moors SPA/SAC and SSSI, and the Shipley Glen Local Wildlife Site (LWS). The LWS was considered to be a SSSI.
- Site forms part of wildlife and green infrastructure corridor lining Walker Wood/Midgeley Woods with Baildon Moor and beyond towards Ilkley Moor.
- Development would disrupt the corridor.
- Will be loss of opportunity for residents to engage with wildlife as well as impacts on Baildon Moor and the need to retain green spaces, trees and vegetation to support the plant.
- No logical argument for developing ancient woodland and Green Belt fields.

20. Impact on trees/hedgerows:

- Development would result in the loss of trees as well as hedgerows and other greenery on the site.
- Potential adverse impacts on protected trees. Suggested that Tree Preservation Orders (TPOs) should be placed on the larger trees.
- Concern over general lack of protection within the Plan for ancient woodland, protected by TPOs.

21. Loss of agricultural land:

- Site in agricultural use (livestock grazing) and should be retain as such.
- Would result in the loss of high-quality agricultural land.

22. Impact on Saltaire World Heritage Site (WHS):

- Site located within the Saltaire World Heritage Site buffer.
- Development would have an adverse impact on the setting of the WHS and well on views into the WHS from Baildon. Would also effects views from the WHS towards Baildon Moor.
- Would be an impact on the residents of Baildon and Saltaire.
- Could jeopardise the status of a key economically and culturally important site (the WHS).

23. Housing design:

- Recent housing development in the area was poorly built and not accompanied by sufficient parking provision, whilst the design was not in keeping with its surroundings.
- New housing could not be sensitively designed without landscape impacts.

- Were new housing to be developed, it should include solar panels and be sustainable with low carbon footprints as well as beneficial to the community with an emphasis on green space provision.

24. Housing mix:

- Queried whether the development would result in the delivery of affordable housing.
- West Lane was a high value/high price area, where it is expensive to buy homes. New properties would not be affordable, particular for first time buyers.
- Suggested that development would not contribute towards the District's social housing needs.
- Provision of social housing would out of character for the area.
- Concerns over the type of dwellings that would be provided. Larger detached properties were considered un-necessary.
- No additional housing should be permitted in Baildon unless it was smaller dwellings that younger people could afford to buy.

25. Sustainability:

- Concerns expressed regarding the wider environmental, economic, social and climate change impacts that development would have.
- Sustainability Appraisal (SA) highlighted a "minor positive" effect of development. This would be entirely socio-economic as it would contribute to the local tax base.
- Conclusion that the site was a sustainable location was challenged.
- Planning for housing should include an aim to reduce the use of natural resources and the impacts on the environment.

26. Deliverability/Community Engagement:

- Queries raised regarding the site's ownership and whether it was subject to any covenants that would it affect its development.
- Sites BA2/H & BA6/H should be considered as a whole.
- Residents should have been informed about the proposed sites.

Support:

1. **Proposed site allocation**:

- Proposed site allocation (together with proposed site BA6/H) supported.
- Land immediately to the north of both sites was available for development. If required these sites could accommodate an increase in the housing requirement for Baildon (if it is increased).
- Both sites considered to be deliverable within the plan period with no ownership constraints.
- Will comprise infill development that can be accessed from West Lane and sensitively designed/masterplanned to retain key features.

- Landscape open space and new connections to the wider landscaped beyond the site(s) could be created.
- Sensitive design would minimise potential visual, landscape and heritage impacts.
- No environmental constraints or ecological enhancements that could not be address via appropriate design. No know viability issues.

2. Proposed site allocation/amendment to boundary:

- Site represented a logical and sustainable location for residential development due to its association with existing built form.
- Site should be extended to include part of the garden of a neighbouring property – Oakleigh House.
- Adding that area would represent a natural and logical extension to the site.
- Could help to ensure a stronger Green Belt boundary to the north.

3. Conditional support:

- Site was conditionally supported provided that a number of issues where addressed.
- West Lane sites considered to be the most natural areas for development in Baildon, if more housing was required, despite the area being Green Belt.
- Would join up two existing built up areas and not extend the town boundary very far into the Green Belt.
- Several issues would need to be addressed including how increased traffic levels arising from development will be dealt with, flood risk and investment in community facilities.
- Community facilities such as a community hall, shop or playgrounds would be need due to its distance location from the town centre.

Comments:

1. Development of Green Belt land:

- Objection to the development of Green Belt land to deliver the proposed housing required for Baildon.
- Site functions well as part of the Green Belt and provides the only link from West Lane to the adjacent moorland. It also prevents sprawl and provides views and openness.
- Development should be accommodated in other locations within the District that are suitable instead of Green Belt. Doing so, would enhance such areas.
- Includes using areas of derelict land and/or disused buildings or premises that have become available for conversion due to changing shopping and working patterns.

2. Impact on character:

- Development would ruin the character of Baildon, impair existing open spaces and impact on the semi-rural nature and openness of West Lane. Would also create sprawl.

	• Area was well used during the COVID-19 pandemic and valued by the community.
3.	**Impact on the highway network:** • Development would lead to further traffic using the local road network, adding to existing issues with traffic and congestion on the main route to/from Baildon, particularly at peak times. • West Lane noted as being busy already and narrow in places. It also serves Sandal Primary School, which causes congestion during term time. Further development would add to this and have implications ford road safety. • Condition of the road due to heavy traffic levels was also raised. • A post COVID-19 traffic survey should be carried out before further considered was given to the West Lane sites.
4.	**Impact on local infrastructure/services:** • Baildon considered not to have enough facilities and services to cope with the demands of an increased population. • GP surgeries would be stretched as would dental services and schools. • Suggested that should the West Lane sites be included in the Plan, it would not include caveats to ensure that development was beneficial to the community rather than detrimental**.** • Should be a requirement for the provision of, or a contribution obtained towards, additional public transport services in the area. Existing bus services were limited.
5.	**Provision of open space:** • West Lane area noted as having deficiencies in the level of park and allotment provision. • New development should include a park space and other green space within it. • Development should ensure access to the Green Belt and Baildon Moor for wildlife and people
6.	**Flood risk/drainage:** • Flooding and surface water run-off needed to be taken into account and addressed. West Lane was known to experience flooding caused by surface water run-off during periods of heavy rain. • Site (together with proposed site BA6/H) was the main area for water to run-off the adjacent Baildon Moor and that it absorbs some of this flow. • Development would mean that this area would be lost and water displaced elsewhere, causing flooding in other locations. Streams also appear on the site, adding to flooding issues. • Local drainage network would need to be improved, whilst it was suggested that development could only take place if there was an insistence on including an expensive water capture/holding system. The latter would not happen. • Site is located in Flood Zone 1. • Further guidance provided on flood risk mitigation measures and surface water discharge rates.

7. Impact on biodiversity/wildlife: • West Lane area was home to a range of wildlife (bats, deer, hares, owls, pheasants, cattle, sheep). Development would result in its loss and the habitats that support it.
8. Impact on landscape: • Would have a negative impact on the landscape.
9. Housing mix/design: • Suggested that new housing should take the form local level/bungalow style dwellings with appropriate screening. Would be similar to that already located to the west of site BA6/H. • This type of housing would attract older people to the area, releasing family sized homes to the local housing market.
10. Impact on Saltaire World Heritage Site: • Site within the Saltaire World Heritage Site (WHS) buffer zone. • Development would encroach into the important landscape setting of the WHS. • View across the site towards the WHS identified in the WHS Management Plan as being “critical”. • Accompanying Heritage Impact Assessment (HIA) undervalues the contribution that the site makes to the WHS’s setting and, as a result, the harm that its development may upon the WHS’s significance. • Provision of a green buffer, as mitigation, would further interrupt views of the WHS and the ability to appreciate its planned layout. • Loss of the site was considered likely to cause considerable harm to one of the key elements that contributes to the significance of Saltaire. • Allocation and development would run contrary to the advice set out in the NPPF. The site should not be allocated.

Representation IDs: 340, 436, 441, 628, 768, 791, 797, 808, 945, 1008, 1019, 1029, 1162, 1193, 1285, 1759, 1855, 2050, 2190, 2193, 2332, 2422, 2635, 2784, 2828, 2921, 2992, 3005, 3166, 3194, 3232, 3516, 3632, 3755, 3796, 3834, 4402, 4646, 4736, 5034, 5069, 5119, 5184, 5352, 5454, 5489, 5591, 5769, 5949, 5959, 6081, 6196, 6329, 6403, 6413, 6761, 6936, 6948, 7099, 7920, 7922, 7925, 7967, 8104, 8109, 8131, 8375, 8423, 9552, 9715, 10178, 10329, 10490, 10627, 10689, 10755, 10837, 10859, 10870, 10946, 10970, 10977, 11264, 11364, 11376, 11381, 11468, 11497, 11556, 11843, 11957, 12064, 12075, 13076, 13243, 13360, 13740, 14174, 14312, 15379, 15833, 16349, 16380, 16475, 16605, 16611, 16616, 16861, 17266, 17488, 18248, 18415, 18545, 18563, 18649, 18768, 18914, 19535, 20060, 20088, 20108, 20136, 20391, 20397, 20698, 21231, 21258, 21363, 21366, 21386, 21413, 21484, 21781, 22778, 23483, 23485, 23673, 23987, 24022, 24495, 24683, 24789, 24906, 25315, 25458, 25521, 28560, 28568, 28591, 28751, 29332, 29495, 29914

BA3/H: Cliffe Lane West

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BA3/H: Cliffe Lane West	12	12	6	4	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed alternative use • Loss of open space/playing field/recreational land • Impact on designated heritage asset and heritage impact assessment • Impact on the highway network • Impact on local infrastructure/services • Flood risk/drainage • Impact on public right of way network • Proposed site allocation • Housing mix • Loss of green space	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H57 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Proposed alternative use: • Suggested that the site would be better used as community allotments.
2. Loss of open space/playing field: • Would result in the loss of an important area of open space and playing fields. • Would have an effect on wildlife and general wellbeing of the community.

• Area acts a “green lung” for residents, providing with access to opportunities for recreation without having to travel elsewhere using a vehicle.
3. Impact on designated heritage asset: • Site is an important heritage area and therefore unsuitable for development**.**
4. Impact on the highway network: • Site access would need to be given careful consideration to avoid excess congestion or inconvenience. • More traffic would add to the already overloaded Baildon Road (main route to/from the town). • Area already has too many houses for the road network to cope with. • Further housing would cause greater congestion, noise pollution and more.
5. Impact on local infrastructure/services: • Development would result in further demand on local resources and services e.g. GP practices, dental practices and schools. • GP services were oversubscribed, whilst NHS dental practices were unable to accommodate further patients. • Would also be more competition for school places.
6. Flood risk/drainage: • Potential for increased flooding in Baildon due to development of proposed Local Plan sites and loss of trees as a result.
Support:
1. Impact on public right of way network: • Site allocation supported. • Concerns regarding the adjacent track/Right of Way adjacent to the site, linking the Recreation Ground and The Dell. • Should be protected as a green walking route from Baildon to Shipley, as well as a place for recreation.
2. Proposed site allocation: • Site allocation generally supported as it is part brownfield/part greenfield
3. Housing mix: • Difficulties experienced in selling properties on adjacent development to private buyers. Would expect development to be an extension of the existing social housing.
4. Potential loss of recreation land: • Site allocation generally supported, but concerns expressed regarding potential loss of recreation land.

• Site identified in RUDP as a playing field. • Highlighted that when the adjacent development was proposed, it was recognised that the loss of recreation land should be compensated
5. Impact on local infrastructure/services: • Site allocation supported • Nearest primary school located at the top of Baildon Bank. • Considered important to ensure that community facilities are prioritised in the surrounding area as there is very little provision, particularly for young children and teenagers.
6. Heritage impact assessment: • Heritage impact assessment conclusions supported. • Development would have no impact on the character and setting of Saltaire World Heritage Site or Ferniehurst Farm. • No obtainable views between the site and these designated heritage assets. • Development considerations relating to heritage in the site pro-forma welcomed.
Comments:
1. Housing mix: • Consideration should be given the type of properties to be provided with the aim being to enhance the particular area of Baildon where the site is located. • Difficulties experienced in selling properties on adjacent development to private buyers.
2. Loss of green space: • Site is greenfield and provides a much needed green space for the area.
3. Flood risk/drainage: • Site is located within Flood Zone 1 (FZ1) • Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 631, 824, 1167, 3357, 3518, 5068, 18249, 25459, 28569, 28575, 28752, 29333

BA4/H: Green Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BA4/H: Green Lane	33	32	27	4	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on the highway network • Flood risk/drainage • Impact on local infrastructure/services • Overall level of development • Loss of and development of Green Belt/greenfield land • Impact on biodiversity/wildlife • Site deliverability • Impact on amenity • Housing mix and housing density • Impact on Saltaire World Heritage Site (WHS) • Proposed site allocations • Impact on green infrastructure corridors • Impact on mature/existing trees	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1565 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Impact on the highway network:**
   - Site in close proximity to junction of Green Lane and A6038 (Otley Road).
   - Junction experiences congestion, particularly at peak times, and is considered to be dangerous for road users and pedestrians.
   - Development would exacerbate the situation, placing pressure on the road network and increasing congestion on Green Lane, Otley Road, Cliffe Road and Coach Road.

- Development should consider the junction and include improvements to it, should planning permission be granted.
- Green Lane and Coach Road highlighted as being the main access to Titus Salt Scholl, Roberts Park and the Saltaire World Heritage Site, meaning they are heavily used and experience issues with parking along their length.
- Considered that traffic issues and resultant increases in air pollution would discourage future residents.
- Generally, too many cars in Baildon, as well as too many dwellings for the existing road network. Additional housing would cause more congestion and noise pollution.

2. Flood risk/drainage:

- Green Lane and the surrounding area prone to flooding when the River Aire overflow as well as from surface water.
- Objections to the use of land with a history of flooding.

3. Impact on local infrastructure/services:

- Considered that local infrastructure (roads, transport, schools etc.) could not sustain further housing development.
- Would place major impacts on schools, school places, GP/medical and dental services.
- No new amenities proposed to support any of the developments set in the plan for Baildon.
- More details should be included within the Plan regarding school capacities to demonstrate the impact development may have
- Noted that the former college building on part of the site had been lost as a community resource.

4. Overall level of development:

- Baildon considered to have enough housing already, with significant development taking place in recent years.
- Proposed site allocations along West Lane viewed as not being needed.

5. Development of Green Belt/greenfield land:

- Objection to the development of Green Belt and lack of protection for it in the Plan.
- Green space should be protected without exception.

6. Impact on biodiversity/wildlife:

- Development would ruin a habitat that supports a number of animals. Wildlife was noted as being present on the site in particular deer and squirrels.
- Retention of mature trees and grassed areas would provide a natural habitat and be beneficial to the environment.
- Spaces is a valuable piece of local green space and provides a connection to Shipley Glen.
- Lack of protection given to Ancient Woodland.

7. Site deliverability:

• Proposed allocation considered to be undeliverable. • May be politically sensitive to release and develop it.
8. Impact on amenity: • Concerns expressed that development would result in overshadowing and overlooking of a neighbouring property.
9. Housing mix and housing density: • Concerns that the proposed housing would not be affordable. • Concern that housing density would be too low. • Felt to be the best site in Baildon to achieve a higher density of affordable housing compared to others in the plan.
10. Impact on Saltaire World Heritage Site (WHS): • Site is within the Saltaire World Heritage Site (WHS) buffer zone. • Development could harm elements that contribute to the significance of the WHS. • Before allocation, an evaluation should be undertaken of what impact development would be likely have upon those elements that contribute to the significance of Saltaire. • Green Lane noted as a gateway to the WHS and Roberts Park. New development would need to be sympathetically design to reflect this.
11. Proposed site allocations: • Area strategy and allocations considered to be based on flawed Green Belt Assessment and inconsistent application of methodology to the proposed sites. • Evidence base and resultant proposed allocations do not meet the policy test for release.
12. Impact on green infrastructure corridors: • Site located between two green corridors – the River Aire and the corridor linking the river with Midgeley Woods/Fairbank Woods. • Considered to be a connection between them.
Support:
1. Proposed site allocation: • Proposed allocation considered to have the least potential negative impacts on the six sites put forward in Baildon. • Both parts of the site have been previously development and despite being grassed could be taken as brownfield.
2. Impact on the highway network: • Proximity to junction of Green Lane and Otley Road noted. Development would impact upon it.

• Supported on the proviso that road improvements are undertaken at the junction. If not, continued queuing would result in poor air quality for residents. • Site's good transport links noted.
3. Flood risk/drainage: • Development would require adequate flood protection • Carefully consideration should be given to contents of any flood risk assessment prepared to support development • Natural spring in close proximity to the site.
4. Impact on mature trees: • Concerns regarding impacts on the mature trees present on the site.
Comment:
1. Loss of greenfield land: • Site is greenfield and acts a buffer between Baildon and Shipley. • Would lost be as result of development.
2. Impact on existing trees: • Requirement to retain mature trees present within the site welcomed
3. Impact on the highway network: • Concern over the site access from the Green Lane/Otley Road junction
4. Flood risk/drainage: • Concerns over potential for flooding on the site • Small parts of the site are within Flood Zones 2 (FZ2) and 3 (FZ3) as well as draft Flood Zone 3b (FZ3b)/current Flood Zone 3ai (FZ3ai). • No development should take place within draft FZ3b or current FZ3ai unless considered water compatible. Development should follow a sequential layout to prevent un-necessary development in areas within higher degree of flood risk. • Further guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required

Representation IDs: 231, 338, 437, 702, 798, 825, 1021, 1148, 1164, 1194, 2191, 2423, 2542, 2574, 2926, 3362, 3515, 3726, 4064 ,4096, 4325, 5073, 11480, 13233, 18250, 19538, 21361, 24909, 25460, 28570, 28576, 28753, 29334

BA5/H: Meadowside Road, West of Baildon CE Primary School

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BA5/H: Meadowside Road, West of Baildon CE Primary School	146	143	141	2	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt and greenfield land • Green Belt Assessment • Previous planning history • Impact on landscape • Impact on visual amenity • Consistency with the Local Area Strategy/policy • Impact on biodiversity/wildlife • Impact on designated nature conservation sites/areas • Impact on wildlife and Green/Blue Infrastructure corridor • Impact on agricultural land • Location of development • Impact on local infrastructure/services • Impact on public transport network • Impact on the highway network • Site access • Overall level of development • Impact on character and amenity • Impact on pollution • Impact on leisure and recreation • Topography and ground conditions	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H59) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

• Flood risk/drainage • Impact on trees • Housing mix and design • Housing density/ Proposed site yield • Impact on health and wellbeing • Proposed site allocation • Proposed site boundary • Flood risk/drainage	

Objections:
1. Development of Green Belt/greenfield land: • Site located within the Green Belt and strong objection to its use. Was designated for a particular reason – to prevent urban sprawl and stop development from spreading outwards. Plan offered a lack of protection for it. • Development should not be allowed and not necessary. It should be protected to safeguard natural resource and allow future generations to enjoy it. • Area noted as being highly valued by the community and should not be encroached upon. It would extend the town boundary into the countryside. • Green Belt should only be developed in “exceptional circumstances”. No evidence has been produced to set out the strategic case and show that “exceptional circumstances” exist in accordance with the NPPF. Alternative sites considered to be available. • Reference made to a recent court case involving the Leeds Local Plan and proposed Green Belt sites. Considered relevant for Bradford. Site did not meet the policy tests for release from the Green Belt and should be deleted from the Plan. • Site and the Green Belt acts as a buffer between the built up area and the valley. • A wider strategic approach with neighbouring authorities to Green Belt should be adopted to address issues of housing development and prevent its loss. • Would lead to urban sprawl and have a significant effect on the Green Belt, resulting in the loss of open space and environmental and landscape impacts as well as impacts on openness. • Would set a precedent for further encroachment.
2. Green Belt Assessment: • Reference made to the conclusions of the Site Specific Green Belt Assessment to support objections.

- Noted that the Assessments highlights site as having a “major” potential impact on the Green Belt and suggesting that there would be possible sprawl, a “major” impact on openness and no opportunity to create a stronger boundary.
- Site plays a “major” role in safeguarding the countryside from encroachment.

3. Previous planning history:

- A previous planning decision concluded development would be very obtrusive and extend the urban area too far into the Green Belt.

4. Impact on landscape:

- Site (and surrounding area) considered to be an area of outstanding natural beauty in an unspoilt landscape that is highly valued by the community and those who use it.
- Its natural beauty and character/nature would be altered on a permanent basis, whilst the wider landscape would be impacted upon due to loss of open space and openness.
- Area should be retained and retained to provide opportunities for recreation and improved health/wellbeing.
- Area forms a buffer between the built up area and the Tong Valley. It should be established as an “Area of Natural Beauty”. Encroachment would be environmentally irresponsible.

5. Impact on visual amenity:

- Visual impacts would be caused by loss of views over the countryside.
- Development would be highly visible from the valley and further afield.

6. Consistency with the Local Area Strategy/policy:

- Contrary and/or inconsistent with a range of Council policies, strategies and objectives, including the emerging Local Area Strategy.
- Inconsistent with the declaration of a climate emergency as well as commitments to create a green economy and achieve net zero carbon. Contrary to core principal of the Council’s Sustainable Development Plan – living within environmental limits.
- Contrary to stated policies prioritising biodiversity, (including conservation/enhancement of critical habitats and biodiversity net gain), protection of green spaces, exercising environmental stewardship, promoting health and wellbeing, and active/sustainable travel.
- Contrary to principle of 15 minute neighbourhoods regarding access to services.
- Would not make the District a greener place to live as it would add to urban sprawl and was not a brownfield site or in a regeneration area – two key principals of the Local Plan. Contrary to Core Strategy Policies EN1, EN2 and EN8.
- Concerns expressed relating to the impact on climate change, need to support habitats, loss of open spaces, views and landscape changes.

7. Impact on biodiversity/wildlife:

- Site and surrounding area (Gill Beck valley; Tong Park) is off significant biodiversity/wildlife interest, and home to a wide range of animals, birds, insects, plants and trees together with the habitats that sustain them.
- Green Belt allows wildlife to flourish and ensures it protection and preservation. Development should not be allowed.
- Would be significant negative and severe impacts on wildlife and biodiversity on the site and the wider area due to loss of, and/or disruption to, habitats that supports the various animal, birds and insects. Overall environmental and ecological balance would be affected,
- Potential for loss of, or disruption to, wildlife feeding and foraging grounds.
- Wildflower meadows noted as being present in the wider area, which were viewed as being crucial in supporting biodiversity and forming part of an environmentally and recreationally import area within the wider green landscape.
- The meadows would be lost or damaged. Many of the wildflowers present rely on specific ground conditions, including good drainage. Development would affect natural drainage risking the loss of the flowers and associated wildlife that depends on the wildflower meadow habitat.

8. Impact on designated nature conservation sites/areas:

- Site located within close proximity to Tong Park & Hawksworth Spring Wood Local Wildlife Site (LWS) as well as other areas designated as Bradford Wildlife Areas (BWA) and Sites of Ecological & Geological Interest (SEGI).
- Development closer to these designated areas and encroaching into the valley would have a detrimental on them.
- Concern regarding potential impacts on the South Pennine Moors SPA/SAC and SSSI. Suggested that the site falls within SPA/SAC Zone B, or that it forms part of the SAC.
- Should be similar, if not stronger, protections for Baildon Moor and Baildon Bank.

9. Impact on wildlife and Green/Blue Infrastructure corridor:

- Site forms part of an important wildlife corridor running from Baildon Moors towards Spring Woods and the Aire Valley.
- Gill Beck valley was a key green/blue infrastructure corridor, whilst an adjacent Public Right of Way acted as a wildlife corridor.

10. Impact on agricultural land:

- Would be a loss of agricultural land.

11. Location of development:

- Considered that there were/are better and more appropriate sites/areas in Baildon and the elsewhere in the District that should be allocated instead of the proposed site.
- Focus should be on brownfield sites, derelict land/buildings, non-Green Belt sites and sites with less environmental impact. These should be developed first, meaning no requirement for greenfield/Green Belt land.

- Better use of sites with good public transport access should be made, whilst housing densities could be increased and sites with less environmental impact examined.
- Bradford District has a plentiful supply of brownfield sites, with several being present in Baildon.
- Suggested that former mill buildings, commercial and retail premises as well as redevelopment in town centres should be considered. The pandemic had meant many premises becoming redundant that could be reused for residential development.
- Several specific sites were put forwarded including:
  - Former Esholt Waste Water Treatment Works
  - SHLAA site BA/015 – a site with less impacts on wildlife.
  - Land at the end of Green Lane, Baildon
  - Land at The Knoll, Baildon – a neglected/overgrown wooded area.
  - Land at Baildon Green
  - Ian Clough Hall.

12. Impact on local infrastructure/services:

- Objections relating to the impact of development on demand for local infrastructure and services.
- Existing infrastructure and service viewed as inadequate and not able to support further residential development. It would increase pressure upon them, which will be unsustainable.
- Investment in infrastructure had not taken place and should do so in order to support any proposed growth.
- Approach was contrary to the Local Area Strategy aim of “delivering new or enhanced infrastructure”.
- Primary and secondary schools were over-subscribed or at capacity. Development would create further demand for places at both levels and significant investment would be required. Demand would also be created for early years provision.
- Baildon Church of England Primary School, immediately adjacent to the proposed site was at capacity resulting in local children having difficulty in obtaining places. Concerns were expressed regarding class sizes and the school’s admissions policy.
- No secondary school present within the vicinity. Titus Salt School noted as being under pressure, whilst there was no guarantee of being able to obtain places at schools in Guiseley.
- Would be a need to travel elsewhere to access education provision, leading to increased traffic and congestion on the highway networks.
- Evidence used to examine education capacity was queried. Suggested that the Plan includes further details in this regard. The SA conclusion in relation to impact on education was challenged.
- Similar situation exists in terms of GP/medical and dental services. Significant improvements would be needed to support new residents.

- Area lacks shops and other services in close proximity to the site, with only one small shop nearby. Residents would need to use the car to access more shopping facilities.
- Lack of playgrounds, whilst drainage infrastructure was satisfactory.

13. Impact on public transport network:

- Demand for public transport services would increase.
- Existing provision in the area, in particular bus services, was very limited and/or inadequate as well as infrequent. Residents would use cars, adding to existing traffic issues.
- Baildon railway station noted as being within the vicinity of the site, but did not provide a convenient service. Car parking at the station is also limited
- No realistic options for improving public transport.

14. Impact on the highway network:

- Impact of new development on the highway network around the site and in the wider Baildon was a key issue.
- Between 40 and 80 cars and other vehicles would be added to the local road network, in particular Langley Lane, to get to/from the site, creating more congestion and increasing pollution/emissions levels.
- Would be a large increase of traffic levels.
- Meadowside Road was the only access to site and situated off Langley Lane (a long cul-de-sac), which in turns forms the only route to the area from the main highway network. Langley Lane could not support additional traffic from the proposed site.
- Langley Lane experiences issues with congestion and on-street due the presence of the primary school. Road users have difficulties travelling along this road and have been delayed enter/leaving the area. Further vehicles would make these issues worse and have implications for road safety.
- Dangers to road users and pedestrian including school pupils, together with the risk of accidents would be increased.
- Emergency and other service vehicles e.g. school buses could have difficulty accessing the Langley Lane area due to increased congestion caused by any development on the site as well as school traffic.
- Langley Lane was not suitable for HGVs and large vehicles. Construction traffic would cause noise and light pollution and increase risks to pedestrians as well as damaging the road surface.
- The wider highway network in Baildon experiences congestion and delays, which would be compounded by development.
- Pressures would be placed on other sections of the highway network including the junction of Langley Lane and Roundwood Road, which was already dangerous, the junction of Roundwood Road and Otley Road and Baildon Road (between the town centre and Otley Road)

15. Site access:

- Site access considered to be limited, with no alternative option available due previous decisions.
- Meadowside Road is too steep and too narrow, meaning that it would be unsuitable for heavy traffic.
- May also require the use of third party land.

16. Overall level of development:

- No more housing should be built in Baildon. The area already had more than enough houses.
- On other hand, it was considered that Baildon did require more housing, but the proposed site would push the settlement boundary too far into the countryside.
- 40 dwellings would spoil the area, which had already been subject to considerable development.
- 40 dwellings were unlikely to fit into the site area with sufficient space for gardens, garages and green space.

17. Impact on character and amenity:

- Development would have a significant impact on the character of the area and the amenity of those living nearby or using it for recreation.
- Views and the outlook for adjacent properties and footpath would be blocked. Neighbours would experience loss of privacy.
- Increasing homes and population would create more noise pollution, change the area's character from an idyllic and restful countryside.
- Nature of the surrounding street would be changed, whilst health and wellbeing would be affected.
- The community's character should be protected not destroyed.

18. Impact on pollution:

- Development would give rise to increased levels of pollution for a variety of sources.
- Increased traffic would lead to more air pollution (including NO_2 pollution) and impacts on air quality, which in turn would affect local people and their health.
- Baildon's proximity to the proposed Clean Air Zone (CAZ) was noted together with high levels of pollution experienced in the Aire Valley.
- Retaining Green Belt would help to support a reduction in air pollution, whereas development would increase problems. Heating emissions will also increase.
- Light pollution in the Tong Valley and surrounding area would be increased, adversely affecting natural habitats and wildlife. A similar effect would be expected in relation to noise pollution.
- Potential risk of contamination, in particular to groundwater, during construction. Would be general disruption to an unspoilt area and local people as well as creation of more litter and waste.

19. Impact on leisure and recreation:

- Tong Park, Gill Beck Valley and Spring Woods are popular with, and heavily used by, local residents for leisure and recreation purposes. Uses include walking, cycling, running and horse riding.
- Area viewed as being highly scenic and offering opportunities for quiet and peaceful recreation together with enjoyment of the countryside as well as nature.
- Considered important to the health and wellbeing of local people, something that the COVID-19 pandemic had highlighted.
- Development would have a significant negative impact on the area, resulting in the loss of recreational opportunities as well as the sense of open space and damage to the landscape.
- Ladderbanks Lane, a Public Right of Way, the site's western boundary noted as being a key route to access the wider valley and corridor for trees and wildlife.
- The Lane's rural character would be impact upon or lost, reduce the value/attraction of the area for recreation.
- Paths in the are noted as being muddy, causing potential safety issues. The path from Meadowside Road had been re-routed.
- A local group had undertaken works to improve the environment and pedestrian access to the area.

20. Topography and ground conditions:

- Site is steeply sloping in places and would need considerable civil engineering to allow development to take place, adding to environmental and financial costs.
- Concerns raised regarding land stability.
- Steep gradient on Meadowside Road may cause issues accessing the site during winter periods.
- Site was poorly drained and prone to waterlogging and flooding as well as having boggy areas, which could affect its suitability for development.

21. Flood risk/drainage:

- Site prone to waterlogging and flooding as well as affected by surface water run-off for the surrounding area.
- Springs and an underground watercourse are present within the site and in the surrounding area.
- Development increase and exacerbate flooding in the area, including to neighbouring properties.
- Removing a greenfield site would increase surface water run-off, adding to flooding lower in the Tong Valley. Gill Beck was noted as flooding on a regular basis.
- Contamination and groundwater would run downhill from the site affecting the wider area.

22. Impact on trees:

- Ancient woodland and ancient trees are present in the area and could be impacted upon by development.
- TPO woodland designation present along the boundary formed by Ladderbanks Lane, whilst a single tree within the site has a Tree Preservation Order.

- Plan includes a lack of protection for these features and that they would be lost.
- Fewer trees would lead to more flooding.

23. Housing mix and design:

- Cost of developing the site would be unlikely to make the dwellings affordable.
- Developers should be required be work to the highest standards in terms of building and infrastructure design, sustaining/encouraging natural habitats for wildlife and allowing public access.
- Housing should be required to be carbon neutral during construction and once occupied.

24. Housing density:

- Proposed housing densities on proposed site allocations, including those in the Green Belt, considered to be lower than expected/required by emerging planning policy.
- Not accepted that there was a sound rationale for releasing Green Belt land if it would result in 5,000 homes being developed at non-compliant densities.

25. Impact on health and wellbeing:

- Increased use of vehicles and loss of open would impact upon the health and wellbeing of the community.

Support:

1. Proposed site allocation:

- Proposed site allocation supported.
- Considered to be a natural extension to the settlement, in a highly sustainable location and provides an opportunity to provide market and affordable housing to meet Baildon's needs.
- Has no know environmental (natural and built), physical or technical constraints that would preclude or prevent development.
- Site is deliverable, available and suitable for development. Has developer interest.

2. Proposed site boundary:

- Site boundary shown on Local Plan mapping was incorrect and should be amended to show that it has direct access from Meadowside Road.

Comment:

1. Proposed site yield:

- Proposed number of dwellings should be reduced to protect the lower section of Ladderbanks Lane (Bridleway Baildon 17).
- Upper section of the lane had been encroached upon by domestic settings over recent years.

• Lower section was surrounding by mature trees and stone walling and has an open aspect. • The lane should have protected status and wide buffer around it.
2. Flood risk/drainage: • Site is located within Flood Zone 1 (FZ1) • Further guidance provided on flood risk mitigation measures and surface water discharge rates.
3. Proposed site boundary: • Site boundary shown on Local Plan mapping was incorrect and should be amended to show that it has direct access from Meadowside Road.

Representation IDs: 101, 326, 361, 362, 412, 420, 438, 630, 701, 770, 779, 802, 805, 826, 851, 856, 869, 874, 902, 907, 921, 928, 932, 936, 957, 961, 994, 995, 997, 1002, 1027, 1107, 1108, 1144, 1165, 1174, 1184, 1195, 1203, 1242, 1259, 1358, 1360, 1362, 1371, 1864, 2046, 2309, 2424, 2795, 3141, 3257, 3282, 3367, 3463, 3514, 4128, 4182, 4923, 5080, 5163, 5581, 5694, 5778, 5833, 5958, 5974, 5998, 6065, 6066, 6068, 6080, 6101, 6171, 6187, 6201, 6716, 6863, 7230, 7289, 7308, 7365, 7450, 7451, 7452, 7924, 8013, 8106, 8125, 8634, 9824, 10707, 11469, 11498, 11827, 11837, 12304, 12915, 13078, 13470, 13662, 13979, 14881, 15536, 15662, 16100, 16256, 17095, 17100, 17112, 17196, 17770, 17771, 18228, 18251, 18274, 18483, 19536, 20173, 20331, 20583, 21104, 21362, 21483, 23487, 23838, 24908, 25461, 25511, 25542, 25658, 26655, 27546, 27967, 28017, 28235, 28557, 28571, 28592, 28754, 29135, 29296, 29591, 29594, 29595, 30137

BA6/H: West Lane (2)

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BA6/H: West Lane	150	148	140	3	7

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land and Green Belt Assessment • Location of development • Site boundary • Overall level of development • Impact on the highway network • Impact on the transport network • Impact on local infrastructure/services • Impact on character • Impact on green space/open space • Impact on leisure/recreation • Impact on landscape • Impact on visual amenity • Impact on amenity • Flood risk/drainage • Ground conditions • Pollution • Impact on biodiversity/wildlife • Loss of agricultural land • Loss of/impact on trees and hedgerows • Consistency with policy	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H60) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

• Impact on Saltaire World Heritage Site • Design quality • Housing Mix/Provision of affordable housing • Sustainability • Deliverability • Proposed site allocation	

Objections:
1. Development of Green Belt land: • Site is located within the Green Belt, which had been designated for a particular reason – to prevent urban sprawl as well as to protect the countryside. • Should not be allowed to be used or encroached upon, and retained and protected for its intended purpose instead as well as remaining a buffer between the built up area and the countryside It should also be protected for future generations to enjoy. • The Green Belt was highly valued by the community for its natural beauty and the opportunities provided to access the countryside as well as allowing nature to thrive – attributes that would be lost were development to occur, having a negative impact on residents. • Green Belt boundaries could only be altered in “exceptional circumstances”. No evidence provided to demonstrate that there were “exceptional circumstances” why the fields should be removed from the Green Belt to meet the housing requirement. It should remain Green belt until such evidence was forthcoming. Suggested that exceptional circumstances did not exist. • Area was one of the last remaining Green Belt areas in Baildon, providing a break in the built up area between the town centre and Shipley Glen. • It was important to the settlement’s character as well as that of the West Lane area. • Would lead to urban sprawl and a major impact on openness and impact on settlement character. It would close the gap between Honey Pot Lane and Dene Hill, creating a continuous stretch of housing on both sides of the road between the centre of Baildon and Shipley Glen, filling in the break un the urban area. • Would impact on the environment and leave no green space as well as setting a precedent for development on remaining fields in the area as well as have no benefit for the community.
2. Green Belt Assessment:

- Reference was made to the conclusions for the Green Belt Parcel Assessment and Site Specific Green Belt Assessment, some of which were challenged.
- Site noted as being located in a “major” parcel of Green Belt and that makes a significant contribution to openness. The site assessment had not taken the latter into account.
- Considered that the site’s overall Green Belt impact should be classed as “major” rather than “moderate”, whilst it was agreed that there would a “major” impact on openness.
- Green Belt boundary would be weakened as potential new ones would not be less defined than the existing road.
- Area strategy and allocations for Baildon were based on a fundamentally flawed Green Belt review as inconsistent ratings were applied to site. Evidence base and allocations fail to meet the policy test for Green Belt release.

3. Location of development:

- Considered that the Plan approach was not “sound” in terms of meeting the requirements of National Planning Policy Framework (NPPF).
- Highlighted that there are many non-Green Belt sites suitable for development in the Baildon area that had not been taken into consideration in the Plan to meet housing needs.
- Considered that housing should be focussed in other locations with the use of brownfield sites, together with derelict land and buildings being prioritised rather than using/allocating Green Belt and/or greenfield land including the proposed site and others in the West Lane area.
- Highlighted that the NPPF required councils to make as much use as possible of suitable brownfield sites. There were several queries regarding why the Plan did not focus on brownfield land in Baildon.
- Area had plenty of brownfield sites available that had not been considered for inclusion within the Plan in Baildon, Bradford and Shipley as well as in the Airedale corridor that could be developed or redeveloped. Using these sites would not be detrimental and could enhance the wider area as well as allowing Green Belt/greenfield sites and open spaces, particularly in the West Lane area, to be protected.
- Suggested that more effort should be placed on finding brownfield sites and developing them first.
- Queried why brownfield sites were not being used in Baildon as development of greenfield land would have an impact and why brownfield land was not being prioritised.

- Brownfield sites were likely to be distributed to and situated in locations where they could take advantage of transport links and provided access to the amenities and schools that future residents will need.
- Suggestions were made as to the sort of brownfield sites that could be used.
- Suggested that due to changing working and shopping patterns, including those arising from the COVID-19 pandemic, former commercial and retail premises could be repurposed for residential use. Other locations suggested include Bradford City Centre and the inner city which is in need of large scale regeneration and improvement.
- With regard to Baildon, it was suggested that the industrial/employment around Otley Road or other sites such as the Ian Clough Centre should be considered. Baildon Mill was viewed as a site that is ready for development.
- Highlighted that the Bradford Council area will be part of a review by the West Yorkshire Combined Authority (WYCA) that will likely result in further parcels of non-Green Belt land becoming available in the near future for development, meaning that there was no need to remove sites from the Green Belt to meet housing targets

4. Site boundary:

- Suggested that the Green Belt Assessment had not taken into account the significance of the site on opennes.
- Western and eastern boundaries of sites BA2/H and BA6/H should be amended to allow for a significant degree of openness and to demonstrate a link between the urban area and the countryside.
- Would result in a need to find additional land elsewhere in Baildon for 40 to 50 dwellings.

4. Overall level of development:

- Concerns expressed regarding the overall level of development proposed of Baildon, including the West Lane area.
- Baildon had seen significant development in recent years, some of which had resulted in the loss of Green Belt or greenfield land and it becoming over-developed.
- Suggested that Baildon had too much or enough housing
- Queried why the Plan identifies land for 217 dwellings when the requirement is 170 dwellings when those with planning permission had been discounted.
- West Lane had seen significant development recently, with further growth damaging the area and it turning it into a large housing estate.
- 127 dwellings considered to be too many for the area, and would result in most of Baildon's housing requirement being provided in one location – a disproportionate amount.

- Need to provide housing was recognised, however the proposed locations were questioned.

5. Impact on the highway network:

- Concerns expressed over the impact of further development on the highway network near the site and in the wider Baildon area, together with its ability to cope.
- Further concerns raised in relation to the impact on safety of road users and pedestrians that may arise.
- Would be an increase in traffic using the roads, particularly West Lane and the main routes in/out of Baildon, causing increase pressures on the network, more congestion, more delays, more noise, pollution and a reduction in air quality.
- West Lane noted as a busy route through the area, becoming a "bottle neck" at certain times of the day, in particular school pick up/drop off times. It also suffers from speeding vehicles. Development would add further traffic to West Lane and exacerbate existing issues and create more standing traffic.
- West Lane suffered poor visibility and limited pavements, generating risks to pedestrians and motorists due to increased traffic.
- The road serves Sandal Primary School that has issues with congestion and parking. More traffic would increase risks to the safety of school children.
- Highway network in Baildon was considered to be at capacity and unable to support development and the increase traffic that it would create. It is inadequate with no further capacity.
- Major improvements to the network would be needed to accommodate development.
- Baildon has one main access route leading from the town centre towards Shipley. It becomes congested at peak times, affecting West Lane. Development would exacerbate this problem and increase delays.
- Baildon roundabout, junction of Baildon Road/Otley Road and the river crossing to Shipley noted as a key pressure points. A6038 was heavily used and would need to accommodate traffic arising from developments in Wharfedale.

6. Impact on the transport network:

- Public transport provision limited and poor quality – only one bus per hour. Means that residents will use cars to travel to work and elsewhere adding to congestion and pollution. Also a lack of services to Guiseley, Ilkley and Otley,
- Access to Saltaire railway station is difficult via a steep bridleway/path. Would dissuade potential passengers from using the train. Baildon station noted as being distant from the site (2 miles and 25/30 minutes' walk) with insufficient parking and no direct services to Leeds.
- Guiseley and Shipley stations were potential alternative options but also had limited parking.

- Unrealistic to assume residents will walk or cycle to access services and facilities, whilst they would not use public transport. Buses empty and people drive short distances to schools.

7. Impact on local infrastructure/services:

- Ability of local infrastructure, services and amenities in Baildon to support further development was questioned. Plan had not addressed or considered the need for additional infrastructure.
- Existing infrastructure – schools, health services, dental services and other public services/amenities e.g. shops and pharmacies – was insufficient to cope with more residential development.
- Residents already experience issues accessing services/facilities such as school places or GP appointments. Further development would place an increase burden and pressure on local infrastructure and services.
- Schools (primary and secondary) considered to be at capacity and/or oversubscribed with no places available for additional pupils.
- Sandal Primary School had no places and would need investment to expand to accommodate more pupils. A similar issue affects Titus Salt School – the nearest secondary school. Pupils would, therefore have to travel elsewhere to access education, adding to the amount of traffic on the roads.
- Further detail was sought on ow the impacts on Sandal Primary School would be addressed, whilst the SA scoring for impact one education was questioned.
- GP/medical services were also considered to be at capacity and insufficient to meet current and future needs. Baildon noted as having two GP surgeries for its current population. Pressure would be placed upon them, impacting current patients and the quality of service. Dental services had no vacancies.
- Pressures would be placed on other Council/public services e.g. waste collection/disposal, highways, parking and policing as well as the utilities networks (water supply, drainage, power supply). Utilities were viewed as being unreliable and unsound.
- Area lacked children's playgrounds as well as other facilities for children and young people.
- Town centre had experience the loss of a range of shops and services. Development may have a further impact on its vitality and viability. Other concerns related to the loss of community facilities e.g. the local library and the Ian Clough Hall. Further investment was required in the town centre to expand its offer.
- Water supply would need to be upgraded and local amenities (playgrounds, parking, school places, library retention, community centres) to support developments needed to be provided and/or guaranteed.
- Had been a general lack of investment in infrastructure and amenities in recent decades, in particular to accompany the 300 dwellings built in the West Lane/Lucy Hall Drive area during the past 30 years.

8. Impact on character:

- Baildon considered to be a small town and not able to accommodate more residents. Development would bring overcrowding. Area was already heavily built up.
- Would result in the loss of Baildon's village/semi-rural feel with it becoming more urbanised. A degree of community identity would be lost. It would be a commuter based dormitory settlement, contrary to the community's wishes. Community interest had not been considered.
- West Lane sites (BA2/H & BA6/H) together with the Moors and fields considered to represent a key part of the settlement's character.
- West Lane had been subject to a large quantity of development in recent year and was already heavily built up. More development would alter its character.
- A large housing estate and "concrete jungle" would be created, contrary to wishes of the community.
- Maintaining green spaces on West Lane and retaining the land considered vital and having value for the aesthetics of the area. Noted as being the last remaining area of green space in the a rea.
- Development would create sprawl along both sides of West Lane changing its character and affecting the natural beauty of the Moor and the character and appearance of the area as well as a negative effect on the community.
- Suggested that the site would be natural infill and better than some of the other sites proposed.

9. Impact on green space/open space:

- Development would impact on, and result in the loss of, open and green spaces.
- The site is one of the last remaining green spaces along West Lane, which would be lost were it to be developed. This area should be retained to benefit local people and the wider environment.
- It would result in ribbon development along the length of West Lane changing its character and nature.
- There would be an impact on Baildon Moor as its quality along with the space around it would be reduced/diminished.
- Open space was required between the centre of Baildon and Shipley Glen.
- The Plan's approach does not protect/enhance open spaces and green areas.
- The open spaces are highly valued by the community and important for health and wellbeing, and much needed in the area for residents as well as protecting wildlife. If lost, there would be an impact on the quality of life.
- Open spaces/green spaces should be provided as part of any development schemes, were they to take place.

10. Impact on leisure/recreation:

- Site's surrounding area is valued and well-used by the community and visitors for leisure and recreation purposes, in particular walking and enjoyment of the countryside. Generally, it was considered important for the health and wellbeing of the community.
- Site located close to several Public Rights of Way running across Baildon Moor. Walkers also use West Lane/Lucy Hall Drive to reach Bracken Hall Green and Shipley Glen.
- Would be a negative impact on views from these walking routes and on the openness of the area, spoiling its amenity and damaging a beauty spot as well impacts on health and wellbeing.
- Green spaces should be maintained to continue to provide offer opportunities for leisure, recreation and relaxation, and benefit the health and wellbeing of local people and visitors.
- Would detract from the quality of the countryside and visitor experience to Baildon Moor and Shipley Glen.
- Developer should maintain public rights of way into the wider Green Belt, were development to take place.

11. Impact on landscape:

- Would be a major impact on the landscape and was adjacent to the valued/protected Baildon Moor and Shipley Glen.
- Area was part of a valued landscape – the last green buffer between the built up area, Shipley Glen and Baildon Moor and last visual connection with the moors. Was part of the area's agricultural character.
- Should be protected, whilst there was a view that the landscape was an area of outstanding natural beauty. It was also felt to be unique and irreplaceable.
- Landscape is varied, visually stimulating and open, providing enjoyment for the community.
- Site rises steeply towards Baildon Moor, meaning that there would an impact on the wider Aire Valley.
- Would be impossible to develop on the site in a manner that was sympathetic to the surrounding area.
- Integrity of Baildon Moor would be impacted upon and natural field patterns destroyed.

12. Impact on visual amenity:

- Would be impacts on visual amenity, views and vistas, together with the community's enjoyment of them.
- Impacts would be felt in the immediate surrounding area as well as over longer distances.
- Views of the Aire Valley and the countryside from adjacent residential areas would be lost or damaged.
- The site's steep gradient meant that visual impacts would be increased.
- The open aspect of the and views towards Baildon Moor from West Lane would be obscured.

- Views from upper sections of Baildon Moor would be severely impaired or reduced due the site's prominence in the landscape.
- Could include impacts on views to/from the Saltaire World Heritage Site.
- No compensatory improvements or landscape buffering would make good any loss of views and improve the sprawl encroaching into the area, despite the requirement for sensitive design.

13. Impact on amenity:

- Existing residents would be impacted upon negatively, particularly during the construction phase due to increased traffic and pollution levels.
- Property values would be negatively affected.
- Residents and visitors would be affected by a change in character of the area to a more urban form.
- Neighbouring properties would experience a loss of light and privacy as well as restricted views and overlooking.

14. Flood risk/drainage:

- Development would increase the risk of flooding to the surrounding area and spread the effect to other areas (including the River Aire). New and existing properties would also be affected.
- Would be a reduction in natural drainage and water storage, whilst the springs and watercourse could be affected causing more issues due to disruption or re-routing. These had already been affected by recent developments.
- There would be more pluvial flooding during periods of heavy and surface water would flow off the site faster due to increased amounts of hard surfacing causing flood to surrounding streets.
- Drainage network was unable to cope with existing water flows. Development and increase levels of surface water run-off from the moors would add to these problems.
- Improved drainage systems would need to be put in place and surface water issues dealt with.

15. Ground conditions:

- Concerns regarding the effects of development ground stability.
- Parts of the site were boggy and/or wet due the presence of watercourses and springs.

16. Pollution:

- Development would lead to increased levels of pollution from a range of sources – air pollution, noise pollution, light pollution, as well as an adverse impact on air quality.

17. Impact on biodiversity/wildlife:

- Would be a significant negative impact on local wildlife and biodiversity, as well as the countryside and landscape more generally.
- Site should not be developed and retained/protected as green space including to support wildlife.
- Site noted as being home to a range of animals, birds, insects and plants – some of which are considered to be “at risk” or “endangered” – as well as habitats that support them.
- Bats, bees, buzzards, curlew, deer, duck, fieldfares, foxes, geese, herons, kestrels, lapwings, owls and pheasant present in the area.
- Development close to the moors will inhibit and reduce the environment that supports wildlife via loss of biodiversity, habitats, feeding grounds and nesting grounds. Wildlife would be displaced.
- Site within close proximity to the South Pennine Moors SPA/SAC and SSSI, and the Shipley Glen Local Wildlife Site (LWS). The LWS was considered to be a SSSI.
- Site forms part of wildlife and green infrastructure corridor lining Walker Wood/Midgeley Woods with Baildon Moor and beyond towards Ilkley Moor.
- Development would disrupt the corridor.
- Will be loss of opportunity for residents to engage with wildlife as well as impacts on Baildon Moor and the need to retain green spaces, trees and vegetation to support the plant.
- No logical argument for developing ancient woodland and Green Belt fields.

17. Loss of agricultural land:

- Site currently in agricultural use (livestock grazing)
- Would result in the loss of high quality agricultural land.
- Should be left as agricultural land.
- Considered that the UK needed more farming land. As such, the site should not be developed

18. Loss of/impact on trees and hedgerows:

- Would result in the loss of trees, as well as hedgerows and greenery on the site.
- Adverse impacts on any protected trees.
- Suggested that Tree Preservation Orders (TPOs) should be placed on the larger trees.
- Concerns regarding the lack protection within the Plan for ancient woodland that is protected by TPOs.

19. Consistency with policy:

- Contravenes one of the Council's Sustainable Development Plan Action Plan core principles - "Living within Environmental Limits"
- Would not meet/contravenes the emerging Local Plan's overarching environmental objective of enhancing or protecting the environment including valued landscapes.

20. Impact on Saltaire World Heritage Site:

- Site located within the buffer zone for, and in proximity to, the Saltaire World Heritage Site (WHS).
- Development would have an adverse impact on the WHS's setting as well as on views into it.
- Would also be visible from the WHS and adversely affect views from it.
- Would have an impact on residents of Baildon and Saltaire as well as visitors to the area. Could jeopardise the status of this economically and culturally important site.
- Development would encroach into the important landscape setting of the WHS.
- One of the views across the site towards the WHS was identified in the WHS Management Plan as being "critical", and that the accompanying Heritage Impact Assessment (HIA) had undervalued the contribution that the site makes to the WHS's setting, and as result, the harm that its loss and subsequent development might have upon its significance.
- The provision of green buffer, as a mitigation measure, along the northern boundary would only service to further interrupt views of the WHS and the ability to appreciate its planning layout.
- The loss of the site was considered likely cause considerable harm to one of the key elements which contributes to the significance of Saltaire.
- Its allocation and eventual development would run contrary to the advice set out in the National Planning Policy Framework (NPPF). The site should not be allocated for development.

21. Design quality:

- Recent developments in the area were poorly built and lacked sufficient parking provision.
- Design was not in keeping with the surrounding area.
- New housing should include solar panels, whilst the Council should seek to ensure housing is sustainable with a low carbon footprint.
- Should development occur, caveats must be included to ensure it is beneficial, within an emphasis on the provision of green areas.

22. Housing Mix/Provision of affordable housing:

- Questioned whether development would result in the delivery of affordable housing that is required to meet local needs.
- West Lane highlighted as being a high value/high price residential area, where it is expensive to buy homes.
- Any new homes it was felt, would be not be affordable, particularly for first time buyers.
- Would not meet the social housing needs of Bradford.
- Social housing would be out character for the area.
- Houses provided would not be eco-friendly.

23. Sustainability:

- Concern expressed about the wider environmental, economic and social, as well as climate change impacts that the development would have.
- Addressing/understanding the environmental impacts were considered paramount.
- SA scoring for the proposed site was identical to that for the adjacent site BA2/H.
- Local Plan's conclusion that the site is a sustainable location for development was challenged.
- Considered that in planning for housing there should be an aim to reduce use of natural resources and reduce the impact on the environment

24. Deliverability:

- Queries raised regarding the site ownership and potential for covenants that would prevent development.
- Residents of the area should have been informed.
- Sites BA2/H and BA6/H should be considered as a whole.

Support:

1. Proposed site allocation:

- Conditional support, despite objections to development in the West Lane.
- If housing is required, the West Lane sites appeared to the most natural area for development, despite being Green Belt.
- Would join up two existing areas and not extend the town boundary very far into the Green Belt.
- Several issues needed to addressed including dealing with increased in traffic, undertaking an analysis of flood risk, and the need for investment in community facilities.

2. Proposed site allocation:

- Support for proposed site allocation (as well as proposed site BA2/H).
- Suggested that further land immediately to the north was available, meaning that should the housing requirement Baildon be increased it could be accommodated.
- Site considered to be deliverable within the plan period, with no ownership constraints or known viability issues.
- Would represent infill development that can be accessed from West Lane and sensitively designed masterplanned to retain key features, provide additional landscaped open space and new connections to the wider landscape.
- Sensitive design would minimise potential visual, landscape and heritage impacts. No environmental constraints or ecological enhances that could not be addressed via design.

Comment:

1. Development of Green Belt land:

- Concerns expressed regarding the development of Green Belt land, particularly in the West Lane area to deliver the proposed housing requirement.
- Site considered to function well as part of the Green Belt and provides the only link from West Lane to adjacent moorland, as well as preventing sprawl. Also provides good views and openness.
- Development would ruin the rural character of the immediate area as well as Baildon as a whole, impair existing open spaces and impact on the semi-rural nature and openness of West Lane as well as creating sprawl.
- Green Belt was well-used during COVID-19 pandemic and valuable resource for the community and visitors in its existing form.
- Suggested that development could accommodated in other locations including brownfield sites that were more suitable instead using Green Belt. Plan should be reconsidered.
- Includes areas of derelict land, disused buildings or premises that have become available for conversion due to changing shopping and working pattern. Their using would enhance such areas.

2. Impact on the highway network:

- Concerns expressed regarding the impact of development in the West Lane area on the local highway network and traffic levels in Baildon.
- Would lead to further traffic using the local road network, adding to existing issues with traffic and congestion on main road to/from Baildon.

- West Lane considered to be narrow in places and experiencing congestion at Sandal Primary School during drop off/pick up times.
- Development add to congestion and have implications for road safety, whilst the condition of the road was questioned.
- Suggested that a post-COVID-19 traffic survey should be carried out before further consideration is given to the sites.

3. Impact on local infrastructure/services:

- Baildon considered not to have enough facilities/services to cope with demands from an increased population.
- GP surgeries, dental services and schools would be stretched.
- Considered that development, if permitted, should benefit the area. e.g. there should be provision of or, a contribution should be sought towards, additional public transport services in the area.
- Bus services considered to be limited.

4. Provision of open space:

- West Lane area has deficiencies in the amount of park and allotment space.
- Suggested that green spaces or a park space should be included within any development on the site.

5. Flood risk/drainage:

- Flooding and surface water run-off need to be taken into account.
- West Lane area experiences flooding due to surface water run-off during periods of heavy rain.
- Site forms main area for water to run-off Baildon Moor and absorbs some it. When overloaded it spills onto West Lane.
- Area would be lost and water displaced, causing flooding in other locations.
- Streams also appear on the site, adding to flooding issues.
- Local drainage network would need to be improved.
- Suggested the only way building could occur would be to insist on the inclusion of expensive water capture/holding systems which would not happen.
- Site noted as being with Flood Zone (FZ) 1.
- Further guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required

6. Impact on biodiversity/wildlife:

- Area is home to range of wildlife, including bats, deer, hares, owls and pheasants as well as cattle and sheep.

• Development would result in the loss of habitats that support them
7. Impact on landscape: • Development would have an impact on the landscape.
8. Housing mix: • Suggested that housing should take the form of low level/bungalow style dwellings with appropriate screening. • Would be similar to existing housing to the west and would minimise impact on the Green Belt. • Would attract older people to the area, releasing family size homes to the local housing stock.
9. Impact on Saltaire World Heritage Site: • Consideration should be given to the site being within the Saltaire World Heritage Site (WHS) buffer zone. • Development would encroach into the landscape setting of the WHS. • One of the views across the site towards the WHS was identified in the WHS Management Plan as being "critical", and that the accompanying Heritage Impact Assessment (HIA) had undervalued the contribution that the site makes to the WHS's setting, and as result, the harm that its loss and subsequent development might have upon its significance. • The provision of green buffer, as a mitigation measure, along the northern boundary would only service to further interrupt views of the WHS and the ability to appreciate its planning layout. • The loss of the site was considered likely cause considerable harm to one of the key elements which contributes to the significance of Saltaire. • Its allocation and eventual development would run contrary to the advice set out in the National Planning Policy Framework (NPPF). The site should not be allocated for development.

Representation IDs: 439, 629, 769, 771, 809, 946, 1010, 1022, 1028, 1163, 1196, 1286, 1378, 1860, 2049, 2192, 2194, 2336, 2425, 2636, 2786, 2836, 2908, 3152, 3153, 3234, 3369, 3513, 3783, 3798, 3837, 4052, 4400, 4648, 4741, 4836, 5036, 5081, 5120, 5353, 5458, 5589, 5775, 5954, 5961, 6082, 6166, 6197, 6330, 6404, 6414, 6763, 6937, 6949, 7101, 7520, 7921, 7923, 7926, 7968, 8105, 8110, 8132, 8165, 8241, 8376, 8424, 9553, 9716, 10179, 10331, 10491, 10628, 10690, 10757, 10838, 10860, 10871, 10947, 10971, 10978, 11265, 11365, 11377, 11382, 11479, 11499, 11557, 11844, 11958, 12065, 12076, 12813, 13077, 13244, 13362, 13741, 14175, 14313, 15380, 15835, 16350, 16381, 16476, 16606, 16612, 16617, 17267, 17489, 18416, 18546, 18565, 18650, 18748, 18770, 18915, 19537, 20061, 20089, 20109, 20137, 20392, 20398, 20699, 21259, 21364, 21367, 21387, 21414, 21485, 21782, 22779, 23484, 23486, 23674, 23988, 24023, 24496, 24684, 24790, 24907, 25462, 25522, 28563, 28572, 28593, 28755, 29381, 29496, 29915, 4789, 27933, 28701, 19922, 28702, 692, 1206, 2137, 2303, 2774,

3090, 28703, 335, 1065, 1208, 1760, 2132, 2183, 2301, 2789, 3101, 3342, 3892, 3907, 3927, 4049, 4543, 4695, 4795, 4849, 4865, 4954, 5611, 5675, 5755, 6533, 13595, 16103, 19533, 19878

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 99 within the consultation document.

Summary of Consultation

A total of **10** representations were received in relation to Question 99 from **10** respondents. Respondents included Highways England, local residents, the Bradford Local Access Forum and a Ward Councillor. **Table 77.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 77.6**.

Consultation Question 99 - Baildon Preferred Site Allocations

Table 77.5: Consultation Question 99: Baildon Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q99	10	10	6	1	3

Table 77.6: Consultation Question 99: Baildon Preferred Site Allocations - Summary of Representations Received

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Proposed site allocation BA5/H • Objection to proposed site allocations BA2/H, BA4/H, BA5/H and BA6/H, and exclusion of SHLAA site BA/004 • Impact on the highway network • Proposed site allocation BA1/H • Proposed additional site • Proposed site allocation BA2/H	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

Summary of Representations
Objections
1. Development of Green Belt land: • Objection to the use of Green Belt land in Baildon. It should be protected, as should ancient trees and wildlife/wild spaces present within the sites. • Concern that an unacceptably heavy weight was placed on the use of Green Belt sites in Baildon and that no brownfield sites had been identified. • Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed. • Considered that Bradford and Baildon has a number of brownfield sites that could be developed. • Highlighted that the Ian Clough Hall site would become available with the plan period.
2. Proposed site allocation BA5/H: • Would impact on the Green Belt in the immediate surrounding area and endanger wildlife. Specific reference was made to the presence of bats, red kites and owls in the area. • Would destroy views of the Tong Valley and result in encroachment towards a SSSI. • Local infrastructure to support development considered not to be in place. • Local roads viewed as being busy, particularly at peak times, whilst other services/infrastructure are under pressure. • Would increase traffic levels and be a danger. • Issues with drainage and surface water run-off render the site unsuitable. • Other brownfield sites could take the proposed 40 dwellings.
3. Objection to proposed site allocations BA2/H, BA4/H, BA5/H and BA6/H, and exclusion of SHLAA site BA/004: • Flawed evidence based used to the assessment for the site selection, whilst the methodology and site rating underlying the Green Belt review had been applied inconsistently. Flawed evidence base should be corrected. • Resulting in site proposals to allocate sites for development that would result in greater negative Green Belt impacts that some of those rejected. • Site allocation BA5/H should be deleted from the Plan. Would have a significant negative effect on openness and fails to meet the policy tests for release. • Site allocations BA2/H and BA6/H should be reduced in area to retain significant openness on West Lane.

Summary of Representations

- Site allocation BA4/H considered to be undeliverable and should be removed from the Plan and housing trajectory.
- SHLAA site BA/004 should be allocated within the Plan.
- Would represent a "logical rounding off of the existing settlement pattern" and offers a better site with lesser Green Belt impact that some other proposed allocations.

4. Impact on the highway network:

- Already too many houses for the local road network to support at present.
- Additional housing will cause greater congestion, noise pollution and more.

5. Proposed site allocation BA1/H:

- Proposed allocation strongly objected to by local residents.
- Previous planning application (14 dwellings) objected to by over 100 residents and associations (including the Woodland Trust and World Heritage Site). Further reference to these objections should be sought and considered.
- Site is a location of importance for nature and considered unfit for development.

Support

1. Proposed site allocation BA5/H:

- Proposed allocation supported.
- Would provide a sustainable extension to Baildon, in a highly accessible location. No significant constraints to development.
- Site boundary should be amended to reflect the fact that it adjoins Meadowside Road and has direct access from it.

Comments

1. Impact on the highway network

- Development in Baildon would not on its own have a severe impact on the Strategic Road Network.
- It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

2. Proposed additional site:

- Land between Footpath Baildon 64 & Esso Petrol Station, Otley Road proposed as an additional site.
- Would provide a development site and help to improve the PROW network.
- Land not useable due to fly grazing and would provide a good multi-user link.
- Would support opening up of a route from Buck Lane (Ancient Highway/Bridleway). A proposed future intended project.

Summary of Representations
3. Proposed site allocation BA2/H: • Proposed allocation supported. • Viewed as representing a logical and sustainable location for residential development due to its associated with the existing built form. • Site area should be extended to include western section of the garden to Oakleigh House. • Would represent a rational and logical extension to the site. • Could help to ensure a stronger boundary to the Green Belt to the north. • Oakleigh House and its garden considered to make a strong contribution to any of the five Green Belt purposes.

Representation IDs: 466, 820 ,4426, 6794, 12917, 15446, 16761, 24905, 25316, 25456

BINGLEY

Introduction

Plan settlement hierarchy identifies Bingley as one of Bradford district's three principal towns. This means that it will be a main local focus, outside of the Regional City of Bradford, for growth in terms of housing, employment, shopping, leisure, education, health and cultural activities and facilities. Based on this it is proposed that the settlement has a housing target of 850 dwellings. A total of ten site allocations (2 employment sites and 8 residential) were proposed to deliver the development requirement.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Bingley's characteristics and sets out a Local Area Strategy for its future growth and development. As a Principal Town, it will be a key focus for housing and employment growth as well as important service centre to meet the need of existing and future residents. There is also a focus on protecting, enhancing and conserving the natural and built environment and the provision of infrastructure. This was listed as question 100 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **17** representations were received in relation to the Bingley portrait and Local Area Strategy (Question 100) from **14** respondents. Respondents included Highways England, Bingley Town Council, a Ward Member and local residents. **Table 0.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in

Representations focused upon the following key issues: • Objection to Development on Green Belt land which should be protected • Location of development should focus on Brownfield land and undeveloped urban areas. • Impact on local infrastructure/services and non-existent support or provision of investments for improvements to services • Loss of Green Field land	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BI1: Bingley, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Development of the Sty Lane site (BI2/HC) would result in greenfield land being developed and impact on narrow roads and canal crossings • Ensuring that the Crosley Wood Road site (BI5/H) was used for affordable housing seen as essential. • Concerns expressed that despite Bingley being a Principal Town, there had been no/limited public investment in Bingley. • Level of housing growth, Scale of the proposed housing (850 dwellings) considered to be in excess of the community's needs • Support for Green Belt removal and site allocations BI4/H & BI8/H • Emerging Bingley Neighbourhood Plan • Bingley highlighted as a having specific housing needs include the affordable and social housing need	

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Table 0.1: Consultation Question 100: Bingley Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
100	Bingley Portrait & Local Area Strategy	17	14	13	1	3
	Totals	**17**	**14**	**13**	**1**	**3**

Bingley Portrait & Local Area Strategy

Table 0.2: Bingley Portrait & Local Area Strategy - Summary of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
100	Bingley Portrait & Local Area Strategy	17	14	13	1	3

Consultation Question 100 – Bingley Portrait & Local Area Strategy

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objection to Development on Green Belt land which should be protected • Location of development should focus on Brownfield land and undeveloped urban areas. • Impact on local infrastructure/services and non-existent support or provision of investments for improvements to services • Loss of Green Field land • Development of the Sty Lane site (BI2/HC) would result in greenfield land being developed and impact on narrow roads and canal crossings • Ensuring that the Crosley Wood Road site (BI5/H) was used for affordable housing seen as essential. • Concerns expressed that despite Bingley being a Principal Town, there had been no/limited public investment in Bingley.	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BI1: Bingley, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Level of housing growth, Scale of the proposed housing (850 dwellings) considered to be in excess of the community's needs • Support for Green Belt removal and site allocations BI4/H & BI8/H • Emerging Bingley Neighbourhood Plan • Bingley highlighted as a having specific housing needs include the affordable and social housing need	

Summary of Representations
Objections
1. Site allocations (BI2/HC, BI4/H, BI5/H, BI7/H & BI8/H): • Development of the Sty Lane site (BI2/HC) would result in greenfield land being developed and has access constraints caused by narrow roads and swing bridge over the canal. • Heights Lane sites (BI4/H & BI8/H) are located in a green infrastructure corridor that would be blocked as a result of development. Various animals and birds are present within them. • Ensuring that the Crosley Wood Road site (BI5/H) was used for affordable housing seen as essential. • Concerns expressed regarding the Whitley Street site (BI7/H) and potential loss of employment space.
2. Level of investment/provision in Bingley: • Concerns expressed that that despite being a Principal Town, there had been no/limited public investment in Bingley. • Highlighted that a key facility (the swimming pool) is likely to close and a local park needs a make-over. • Considered that more green space should be allocated in centre of the town including the Priestthorpe area as there is no park within walking distance.
3. Level of housing growth: • Housing target could not be met without adversely affecting green spaces on the character of the town.

- Suggested that options should be explored for reducing the town centre area and repurposing it for housing, e.g. Chapel Walk could be turned into residential with the shops being relocated to the shopping centre. An alternative would be for the north end of the High Street being reduced with it becoming quality housing.
- Scale of the proposed housing (850 dwellings) considered to be in excess of the community's needs and inconsistent with the aims of meeting its housing needs and aspirations.
- Represents a 10% increase on the number dwellings in the settlement – excessive and disproportionate to local need.
-
- Noted that Bingley had experienced large scale growth in the last 20 years. Council should adopt a strategy that focusses on harmonious community development for existing population.

Support

1. **Proposed site allocations BI4/H & BI8/H**
   - Support for removing the proposed sites from the Green Belt.
   - Would address housing issues in Bingley, whilst leaving plenty of Green Belt land.
   - Timescales for decision on the proposed sites and how it will be communicated was queried.

Comments:

1. **Impact on highway network:**
   - Development in Bingley would not on its own have a severe impact on the Strategic Road Network.
   - It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
2. **Emerging Bingley Neighbourhood Plan:**
   - Community in the process of preparing a Neighbourhood Plan for the Bingley Town Council area.
   - Several aspects of the proposed housing options in the Local Plan were considered to conflict with the policies of the emerging Neighbourhood Plan.
3. **Housing mix:**
   - Bingley highlighted as a having specific housing needs include the affordable and social housing needs.

- Data from the Housing Needs Assessment, prepared to support the Neighbourhood Plan should be examined and reflected in the proposed housing allocations for Bingley.

Representation IDs: 333, 345, 506, 1205, 1670, 2167, 3881, 3954, 4673, 13036, 15489, 16977, 16978, 16989, 16990, 16991, 18489

Sites

As highlighted above, five sites were put forward in the Preferred Options document to meet the proposed development requirements for Bingley (4 for residential and 2 for employment). Under Q101 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **469** representations were received in relation to policies BI1/H to BI10/E from **458** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents and a Ward Councillor. **Table 0.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.4**.

Table 0.3: Bingley Proposed Sites (BI1/H to BI10/E) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BI1/H: Coolgardie, Keighley Road	7	7	6	0	1
BI2/HC: Sty Lane	32	31	28	0	4
BI3/H: Greenhill Barn, Lady Lane	32	30	29	1	2
BI4/H: Heights Lane (West Side), Eldwick	197	194	186	6	5
BI5/H: Crossley Wood Road, Gilstead	8	8	3	2	3
BI6/H: Marley Court, Crossflatts	6	6	2	2	2
BI7/H: Whitley Street	4	4	1	2	1
BI8/H: Land west of Heights Lane, Eldwick	178	173	164	8	6
BI9/E: Castlefields Road	3	3	2	1	0
BI10/E: John Escritt Road	2	2	0	0	2
Totals	**469**	**458**	**421**	**22**	**26**

Table 0.4: Bingley Proposed Sites (BI1/H to BI10/E) - Summary of Representations Received

BI1/H: Coolgardie, Keighley Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BI1/H: Coolgardie, Keighley Road	7	7	6	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on character • Impact on biodiversity/wildlife • Development of Green Belt/greenfield land • Ground conditions • Flood risk/drainage • Impact on the highway network • Proposed alternative use	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission.

Objections:
1. Impact on character: • Site provides a valuable area of separation between Bingley and Crossflatts, creating a rural feeling that is attractive to residents and visitors.
2. Impact on biodiversity/wildlife: • A range of wildlife is often sighted on the site.
3. Development of Green Belt/greenfield land: • Green Belt/greenfield land should not be developed.

4. Ground conditions:

- Site is bog land (part of Bingley North Bog). Would be difficult to developed successfully without underpinning.
- Being bog land means that it would flood easily and exacerbate flooding in the surrounding area.

5. Flood risk/drainage:

- Objection to continued development for flood land in an already under strain in the event of flooding.
- Considered that until flood defences are improved, development would be unsuitable and irresponsible as well as being a burden.

6. Impact on the highway network:

- Site located opposite the Bingley Grammar School, which experiences congestion issues at its entrance and on the adjacent road at drop off/pick up times causing significant problems.
- 135 dwellings would cause additional traffic issues.
- Traffic considered to be an issue in the wider area.

7. Proposed alternative use:

- Suggested that the site should be used to provide additional facilities for the school (and the community) or office/light industrial accommodation to bring more jobs to the area (as proposed in a previous plan).

Support:

No representations received in support

Comments:

1. Flood risk/drainage:

- Parts of the site are located with Flood Zones 2 (FZ2), 3 (FZ3) and current/draft 3b (FZ3b).
- No development should take place in FZ3 and FZ3b unless water compatible or essential.
- Development should follow a sequential approach to prevent un-necessary development in FZ2 & FZ3b.
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates.

Representation IDs: 692, 1206, 2137, 2303, 2774, 3090, 28703

BI2/HC: Sty Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BI2/HC: Sty Lane	32	31	28	0	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of greenfield/Green Belt land: • Impact on the highway network: • Impact on the wider environment/character: • Impact on visual amenity: • Impact on leisure/recreation: • Loss of agricultural land: • Impact on biodiversity/wildlife • Location of development • Impact on local infrastructure/services • Flood risk/drainage • Impact on water quality • Site accessibility/sustainability • Planning application • Proximity to South Pennine Moors (Phase 2) SPA	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H105 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Development of greenfield/Green Belt land:

- Objection to the development, and potential loss, of Green Belt/greenfield land. Such areas should be protected and not developed upon. Green Belt not as being designated for a reason and should remain so.
- Site is an attractive, large green, open. If developed, it would increase urban sprawl and pollution as well as destroying the natural beauty of the countryside.
- Felt that there are sufficient houses in the surrounding area and that remaining fields and woodland should not be built upon. Suggested there were other areas across the District that are in need of redevelopment.
- Site provides an area of separation between Bingley and Crossflatts, prevent them from becoming one large town. Suggested that they should remain separate.

2. Impact on the highway network:

- Surrounding road/highway network within the vicinity is inadequate to cope with further development and the corresponding increase in traffic.
- Width of the roads were a constraint, whilst the bridge over the Canal was viewed as unsuitable.
- Additional traffic volumes would result in further adverse impacts – congestion, accident rates and air pollution would increase.
- Concerns regarding road safety – some routes in the area are popular with pedestrians, runners, cyclists and horse riders.
- Ease of access for emergency vehicles was raised.

3. Impact on the wider environment/character:

- Concerns regarding the impact of development on the wider environment, the character of the area and the local community.
- Site is a beautiful, open area of rural countryside that would be spoiled by development.
- Wider negative environment impacts arising from development would be irreversible, whilst bring little benefit to the community.
- Concerns regarding loss of community identity, overall scale of development and impacts on the historic character of Micklethwaite.
- Area would become busier with more traffic giving rise to increased noise pollution.

4. Impact on visual amenity:

- The vista of the Aire Valley in the Bingley area would be destroyed, whilst the proposed incinerator near Keighley would affect views from the new homes.

5. Impact on leisure/recreation:

- Canal is a key tourist attraction and popular location for walking amongst local residents.
- Asset would be damaged by development and make it less pleasurable for people to spend time in the area**.**

6. Loss of agricultural land:

- Site is in agricultural use and provides an opportunity for carbon sequestration. Development would result in the sequestered carbon being released.

7. Impact on biodiversity/wildlife:

- Site is home of a range of diverse wildlife and provides an extensive and valuable habitat that supports it.
- Development would result in it being lost, destroyed or heavily impacted upon.
- Specific reference was made to potential impacts on the local toad population resulting from development.
- The canal and adjoining land is part of substantial wildlife corridor, providing a haven from the the built up area.
- Would be adverse impacts on the South Pennine Moors SPA/SAC.
- Much needed green space would be lost.

8. Location of development:

- Considered that there are better areas for development other than greenfield sites.
- New housing should be built primary on brownfield land, where possible.
- Suggested that there is a sufficient quantity of brownfield sites that could be developed, with green spaces left alone.
- 440 dwellings were not required in the area.
- Considered that the area could not cope with such a volume of new homes.

9. Impact on local infrastructure/services:

- Existing schools and medical facilities considered to be over-subscribed or full, or insufficient in quantity.
- Would not be able to support additional demands arising from new homes leading more pressures and less favourable outcomes for users.
- Plan does not provide sufficient detail on how infrastructure impacts would be addressed nor outlines how the local area will be benefit. Suggested that that no extra facilities or amenities were planned.
- Site is not within a priority area for the local school, meaning more car journeys taking place to transport pupils to schools elsewhere.

10. **Flood risk/drainage**:

- Aire Valley is prone to flooding. Development would exacerbate and increase flooding issues in the area.
- Less land would be available to absorb and hold water, particularly that arising from changing and increasing levels of rain.

11. Impact on water quality:

- Would have impacts on water quality in the adjacent canal.

12. Site accessibility/sustainability: • Not located in a public transport corridor or within 15 minutes' walk of a railway station or town centre. • Would be contrary to the Council's sustainability policies. • Would lead to an increase in traffic in the surrounding area.
Support:
No representations received in support
Comments:
1. Planning application: • Noted that a statutory body had previously provided comments on planning applications on the site covering a number of issues included the replacement of a bridge of the canal.
2. Proximity to South Pennine Moors (Phase 2) SPA: • Potential to lead to loss of functionally linked land for SPA birds. • Support expressed for the approach being adopted in the emerging Local Plan, SPD and assessment to loss of such land. • Recommended that allocations should be screened against the model uses to identify the suitability of sites for SPA Golden Plover.
3. Flooding/drainage: • The site located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates.

Representation IDs: 335, 1065, 1208, 1760, 2132, 2183, 2301, 2789, 3101, 3342, 3892, 3907, 3927, 4049, 4543, 4695, 4795, 4849, 4865, 4954, 5611, 5675, 5755, 6533, 13595, 16103, 19533, 19878, 21633, 23676, 25639, 28704

BI3/H: Greenhill Barn, Lady Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BI3/H: Greenhill Barn, Lady Lane	32	30	29	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Impact on trees • Impact on the highway network • Flood risk/drainage • Sustainability/Accessibility • Location of development • Impact on character • Impact on biodiversity/wildlife • Impact on designated heritage assets • Impact on local infrastructure/services • Pollution • Conflict with national policy • Overall level of development • The proposed allocation was supported • Site Specific Green Belt Assessment	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H106 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Development of Green Belt land:**
   - Objection to the development of Green Belt. Should not be developed or lost.
   - Designated as Green Belt for a reason and should not be released as there were other spaces in Bingley that could be developed.
   - Would lead to urban sprawl and set a precedent for further erosion of the Green Belt.
   - Site makes a major contribution to Green Belt, Development would have a major potential for sprawl and major impact on openness.
   - No specific features that could be used to create a more logical or potentially stronger Green Belt boundary.
   - Specific reference was made to the results of the site specific Green Belt Assessment.
   - Site situated in a location that plays a key role in ensuring separation between Bingley and Eldwick, and contributes to transition between urban area and the countryside.
   - No special circumstances to demonstrate that site was required.

2. **Impact on trees:**
   - Site planted with mature/semi-mature conifer trees that would be lost as a result of development. Area covered by a Tree Preservation Order.
   - Trees provide a habitat and cover for wildlife, that would be lost.
   - Not all trees were conifers. Queried whether or not a tree survey had been undertaken.
   - Loss of trees directly conflicts with the concept of planting 2 million trees
   - Trees help to mitigate the effects of greenhouse gases, provide oxygen and sequester carbon as well as help to improve local air quality. More were needed to help achieve carbon neutrality.
   - Suggested that, if development was permitted, as many trees as possible should remain with the level of housing reduced.

3. **Impact on the highway network:**
   - Would result in increased traffic volumes on an already busy network, which cannot cope, creating more congestion and air pollution. Add odds with a proposed zero carbon future.
   - Specific reference made to network within the site's immediate vicinity (Lady Lane, Greenhill Lane, Sty Lane, Walsh Lane, Micklethwaite Bridge) and its various contraints.

- Roads considered to be too narrow and dangerous in places as well as already busy. Increased traffic from any development would increase dangers to users and add to existing problem.
- Lady Lane viewed as being busy and suffering from speeding vehicles as well as having dangerous bend close to the proposed site entrance. Greenhill Lane has a tight bend that cannot accommodate more vehicles, leading to more accidents. Sty Lane also has a dangerous bend. Micklethwaite Bridge is a bottleneck.
- Junction of Greenhill Lane/Walsh Lane/Lady Lane and entrance to Dene Bank are both difficult. More development would exacerbate the situation.
- Site access is poorly sited, just after a sharp bend.

4. Flood risk/drainage:

- Potential for an increase in flooding due to development and removal of trees/vegetation.
- Area already affected by flood water running off the site onto the highway, which would be exacerbated.
- Site noted as being wet and holding water.

5. Sustainability/Accessibility:

- Site sustainability and accessibility questioned.
- Lack of public transport services and distance from local services/amenities means residents would rely on the car to access them**.** Would result in increased traffic volumes on local roads and more air pollution.
- Contrary to the local authority's sustainability policies.

6. Location of development:

- Development should be primarily focussed on brownfield sites, wherever possible, before greenfield/Green Belt sites are used.
- Suggested that there are sufficient abandoned mills in/around Bradford City Centre that should be purchased under CPO powers and their development enforced.

7. Impact on character:

- Eldwick's built environment and village character would be altered by need to accommodate additional traffic.
- Would impact on Bingley's historic environment and result in the loss of community identity,

- Would have a major detrimental visual impact on the area and a negative impact on the local landscape (as highlighted in the Council's assessment).
- Would blur the boundary between the town and the open countryside**.**

8. Impact on biodiversity/wildlife:

- Site contains significant nature, wildlife, flora and fauna (including bats and bored) as well as provided a habitat for them**.** As such, it should not be destroyed or lost.
- Need to provide biodiversity net gain.
- Site within a green wildlife corridor between the urban area and the countryside. Would be degraded if blocked by development.
- Would impact on adjacent priority woodland habitats and loss of agricultural land.
- Site located within 2.5km buffer of South Pennine Moors SPA/SAC with potential for adverse impacts to occur due to development.
- Should not be described as scrubland – site is planted with semi-mature conifer trees. With proper management it would provide a haven for wildlife, contribute towards biodiversity and lock away significant quantities of carbon.

9. Impact on designated heritage assets:

- Site located within close proximity to two Grade II Listed Buildings. Impact on their setting not taken into account.
- Development of tall buildings could impact on the setting of the Saltaire World Heritage Site.
- Before allocation an assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the designated heritage asset and the impact that development would have.

10. Impact on local infrastructure/services:

- Concerns regarding the ability and capacity of local infrastructure (schools, transport, roads, healthcare services) to support further development in Bingley.
- Existing infrastructure considered to be at capacity and unable to cope as well as being generally insufficient.
- Would result in increased pressure and demand for school places (will not be enough, GP and dental services, which will be overloaded.
- Suggested that due to infrastructure issues, development should be limited unless further improvements take place.

11. Pollution:

• Development would increase pollution levels and cause disruption, particularly due to road closures, noise pollutions and construction traffic**.**
12. Conflict with national policy: • Allocation of the site would conflict with national planning policy**.**
13. Overall level of development: • Concerns over the level of housing development that had already taken place in Bingley and Eldwick in recent years. • Further growth was likely to increase the pressure for more development, particular infill development**.**
Support:
1. Proposed site allocation • The proposed allocation was supported.
Comments:
1. Flood risk/drainage: • Site located within Flood Zone 1 (FZ1). • Guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required.
2. Site Specific Green Belt Assessment: • Suggested that the assessment against Green Belt purposes 1 and 3 should be re-assessed as being “moderate” rather than “major”. • Would align them with the wider Green Belt parcel assessment. • Site felt to be one of the least important within Green Belt parcel 44.

Representation IDs: 3361535, 1588, 1671, 1772, 2304, 3103, 3334, 3893, 3928, 4101, 4796, 4866, 5016, 5488, 5705, 5738, 5762, 8345, 11404, 16113, 16983, 18275, 18490, 21280, 21634 ,23677, 24492, 28600, 28705, 29382, 29859

BI4/H: Heights Lane (west side), Eldwick

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BI4/H: Heights Lane (West Side), Eldwick	197	194	186	6	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Proposed housing density • Location of development • Overall level of development • Impact on local infrastructure/services • Impact on the highway network and road safety • Impact on biodiversity/wildlife/environment • Proximity of Prince of Wales Park • Landscape/visual impact • Loss of open space/green space • Pollution • Impact on leisure/recreation • Conflict with emerging Local Area Strategy • Impact on climate change/carbon • Flood risk/drainage • Impact on character and amenity • Sustainability/Accessibility • Housing mix	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H107) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

• Loss of agricultural land • Emerging Bingley Neighbourhood Plan • Support for the Proposed site allocation • Site deliverability • Proximity to/impact on designated heritage asset • Proximity to South Pennine Moors (Phase 2) SPA	

Objections:
1. Development of Green Belt land: • Objection to development of Green Belt land. Has been designated for several reasons include to prevent sprawl and provides a function to protect wildlife habitats and the countryside. Should not be development and protected/preserved into the future. • Council has not produced evidence to demonstrate/justify that there are "exceptional circumstances" for releasing the site from the Green Belt to deliver the area's housing requirement. Suggested that such circumstances did not exist. • Bingley area has many non-Green Belt sites (including brownfield sites) that have not been taken into consideration in preparing the Local Plan. • Local Plan considered to be contrary to the requirements of the NPPF and therefore "unsound". • Noted that the Site Specific Green Assessment state that the site was in moderately performing parcel, making a major contribution to Green Belt purposes with development have major potential for sprawl and moderate impact on openness with no opportunity to create a stronger boundary. • Development would also result in impacts on Prince of Wales Park, wildlife habitats, countryside views, loss of open space, loss of a gateway feature and create sprawl as well a reduction in openness. Would set a precedent for further encroachment and/or pressure for development in the Heights Lane area.
2. Proposed housing density: • Proposed density on Green Belt sites was noted as being much lower than expected/required under Policy HO2. • Not accepted that the level of greenfield allocations was necessary to support the delivery of development outlined in the Local Plan, including in Bingley.

- Suggested that densities should be increased on other more sustainable sites and the size of the Green Belt/greenfield allocations reduced.

3. Location of development:

- Other, more suitable sites/areas where development could take place without the need to use Green Belt sites, including proposed site BI4/H.
- Development should take place on brownfield/previously developed areas of land, or using existing/derelict buildings as well as in areas requiring regeneration.
- The District, including Bingley and the centre of Bradford, has sufficient brownfield land available to accommodate new housing. Would help to rejuvenate towns and cities, attracting people to live and work in them. Such areas have better as access to services and facilities as well as infrastructure and transport. Would also meet the requirements of the NPPF and the Council's wider objectives.
- Reference was made to using former mill complexes and the need to address the 4,000 empty dwellings in the District that should be brought back into use.
- 7 specific sites in Bingley were suggested – former Police Station/Law Courts, Redundant Church between Alexander Court/Poplar Terrace; land to the rear of Premier Inn; the overflow car park for Computershare; land opposite Bingley Grammar School; Doctors surgery on Kingway; former Chuch at Sandbeds.
- Land made available by redevelopment of the District's hospitals – Bradford Royal Infirmary and Airedale General Hosptial – could be used.
- In addition, redundant office, business and retail space should be used to provide new housing, as due to changing working and retail habits there would be less demand for new space. These premises could then be converted.
- Noted that a review was being undertaken by the West Yorkshire Combined Authority (WYCA) will result in further parcels of non-Green Belt land becoming available for development in the near future, negating the need for Green Belt release to meet housing requirements.

4. Overall level of development:

- Eldwick and Gilstead (and other nearby settlements) had experienced a significant amount of residential over recent years/decades. Considered that they did not need further development.

- Recent development had altered the character of the area turning two distinct villages into a suburban type area, with the loss of greenfield sites and coalescence taking place. Area has become overdeveloped and unable to accommodate further housing development.
- Would be a first step towards the coalescence of Eldwick and Micklethwaite and create pressure to release more land and encourage ribbon development.
- National housing targets requiring the release of Green Belt were unreasonable and un-necessary. Queried whether action could be taken locally and nationally to reduce the housing requiring.
- Case of piecemeal allocations on greenfield sites was not cohesive as part of the overall plan.

5. Impact on local infrastructure/services:

- Concerns over the impact of further development in Eldwick as well as Bingley, more generally, would have on local infrastructure and services (schools, early years provision, medical/dental services, retail, public transport, roads and utilities).
- Existing infrastructure considered unable to cope with existing demands placed upon it.
- Eldwick Primary School highlighted as being over-subscribed with no capacity and has been expanded to address requirements resulting from recent development. Children living in the priority catchment area already have difficulties in obtaining places.
- Development would mean children having to travel further to reach schools, primarily by car, impacting on the highway network and creating pollution and congestion.
- Proposed site is not within the priority area for admissions to the school.
- Secondary schools (Bingley Grammar and Beckfoot) are also oversubscribed.
- Local medical practices are oversubscribed or at capacity, with further development bringing increase demand for GP registrations, place a greater strain on resources and negatively impacting on local people's access to services. Similar situation applies to dental services.
- Public transport services were poor quality and infrequent, meaning residents would use the car to access services and travel to/from work, generating more traffic. This would add to existing issues on highway network in Bingley including creating more congestion. Eldwick noted as lacking a railway station.
- Traffic volumes and the ability of local roads to cope are a key issue, whilst parking is inadequate, adding to/creating congestion

- Development would impact on water supply and waste water infrastructure as it be overload them. Flooding problems relating to the sewage system, particularly on Heights Lanes were noted, whilst the area suffers from low water pressures, low quality mobile and internet connections. Local shops are inadequate for the current population
- Suggested that no further development should occur given infrastructure capacity constrained or that it should not take place without improvements.

6. Impact on the highway network and road safety:

- Significant concerns raised in relation to the impact on the highway network and road safety in the Eldwick/Gilstead area. Local roads considered to be unsuitable.
- Area experiences heavy traffic levels to/from and passing through it. Development would add more traffic to the network, exacerbating existing issues.
- Would create more congestion as well as noise and air pollution resulting from standing traffic, which would impact on the health and wellbeing of residents.
- More traffic would also impact on the character of the area, and create more parking problems.
- Park Lane Roundabout (five leg mini roundabout) experiences high volumes of traffic and viewed as being dangerous. Development would exacerbate these issues. It would not be able to cope.
- Specific concerns raised in relation to dangers to pedestrian crossing the road at/near the roundabout. There are also issues with visibility on the approaches to it, particularly from Heights Lane. There is also a history of accidents.
- Heights Lane considered unsuitable to support increases in traffic arising from development of the site due to its narrow width and limited visibility in places. It does not have any pavements/footpaths, with limited room for one to be provided, as well as not lighting
- Heights Lane used by pedestrians, cyclists, runners and horse riders to access the countryside. Providing a path would reduce available road space and create issues for other users.
- Heights Lane presents a risk to the safety of users and resulted in several accidents. Increasing traffic would create further dangers to user's safety and a greater risk of accidents. Vehicle speed is also an issue.
- Lack of pavements would result in new residents using cars to access services and facilities safely. Also it is the only route to reach public transport services. This together with increase danger renders the site unsuitable.
- Noted that Heights Lane had been considered unsuitable in the past as an access to development.

7. Impact on biodiversity/wildlife:

- Site, and the surrounding area (including Prince of Wales Park) considered to be an important wildlife habitat and home to a range of animals and birds.
- Curlews, Lapwings, Thrushes, Pheasants, Owls, birds of prey, deer, bat, hedgehogs, palamate newts and stoats highlighted as being present on the site or in the surrounding area.
- Development would result in negative and/or significant impacts on wildlife and biodiversity including a reduction/loss of habitats and feeding opportunities as well as plants and animals.
- Wildlife, habitats, trees, plants and the countryside should be protected for the future. Green space/open space is also important for the community's health and wellbeing. Suggested that the site should be maintained to preserve habitats for moorland mammals and birds.
- Site is part of wildlife corridor providing a link for species present in Prince of Wales to/from the wider countryside and the moorland beyond.
- Increased noise and transport pollution from additional housing would impact on local wildlife.
- Site is located with the 2.5km buffer zone for the South Pennine Moors SPA/SAC and SSSI. Concerns over potential adverse impacts of development on these protected areas.
- Obligations to safeguard the South Pennine Moors not met within the Plan, meaning it was not sound.

8. Proximity of Prince of Wales Park:

- Site located adjacent to Prince of Wales Park (a Grade II Lister Registered Park). Site would result in adverse or negative impacts on, or damage to the park and its immediate surroundings.
- Park was noted as an important resource and space for the community, providing opportunities for recreation and relaxation, and supporting health and wellbeing. Development would result in the loss of the sense of peace and tranquillity it provides.
- Park considered to be wildlife habitat, being home to a range of birds and animals, and forming part of green/nature corridor linking the urban area with the countryside.
- Green/nature corridor would be inhibited by development, which would have a negative on the wildlife present in the park. Would be a loss of the sense of nature that the park provides.
- Proposed buffer zone between the site and the park was insufficient.

- Long distance views over the countryside to/from the park would be spoiled by, or lost as a result of, development. Visual amenity would be reduced.
- Potential impact on the heritage asset formed by the park. Council's assessment states that loss of the greenfield site would be likely to have a negative impact upon the local landscape and townscape, particularly with the potential to impact heavily on its setting. Historic significance should be protected.

9. Landscape/visual impact:

- Development would have a negative impact on the appearance of the landscape as well as the adjoining townscape.
- Area has a natural beauty that is much valued and should not be lost.
- Development would lead to an increase sprawl, taking growth beyond the natural boundary for the settlement, blurring the interface between the urban and rural areas. In addition, there would be impacts on Prince of Wales Park.
- Would have negative impacts of, or result in loss of views across the wider landscape and countryside, in particular to/from Prince of Wales Park. These views were considered important to local people and visitors.

10. Loss of open space/green space:

- Concerns over the loss of green spaces/open spaces due to development.
- Proposed site and surrounding countryside is valued by the community and something could not afford to be lost. Once lost, it could not be regained.
- Area is important for recreation, contributing to wider health and wellbeing.
- Forms part of a green corridor between the adjacent park and the moors. Development would impact on habitat networks and ecology.

11. Pollution:

- Would result in increased pollution levels in the area from a range of sources – noise, air, traffic and environmental pollution.
- Presence of a historic landfill site in the area that emits radon noted**.**

12. Impact on leisure/recreation:

- Heights Lane noted as being well-used by residents for recreational activities (walking, cycling, running and horse riding) and providing access to the open countryside.

- Development would impact negatively on those using the area for exercise, recreation and accessing the countryside.
- Would affect long distance views and wildlife.
- Reference made to the presence of a riding club on Heights Lane. Concerns that development would adversely affect it and make access to it more difficult.

13. Conflict with emerging Local Area Strategy:

- Development would not meet and/or conflict with elements of the proposed Local Area Strategy for Bingley, particularly those relating to the overall environmental objective of protecting or enhancing the natural/green environment including valued landscapes, and the conservation/enhancement of heritage assets and their settings

14. Impact on climate change/carbon:

- Would contribute towards climate change rather than helping to achieve carbon zero.
- Fields play a role in absorbing carbon and should be left to do so.
- Is a need to invest in existing buildings, together with new sustainable housing that supports a commitment to the natural world and the climate emergency.

15. Flood risk/drainage:

- Site and surrounding area experiences flooding and issues with the drainage being overloaded. Specific reference made to flooding on Heights Lane and Otley Road during periods of heavy rain and the inability of the drainage network to cope.
- Issues experienced with run-off from the site and major drainage problem at the south eastern corner, which required the installation of new pipes along Heights Lane.
- Underground springs present on the site. Also forms an area of bog land.
- Green Belt areas provide opportunities to absorb water and reduce flood risk elsewhere. Should be retained and remain impact.
- New drainage networks must be maintained.
- Would increase the risk of flooding due to loss of open fields and introduction of hard materials. Drainage network would become overwhelmed.
- Concerns development would lead to flooding elsewhere in Bingley and the Aire Valley.

16. Impact on character and amenity:

- Development would impact on the character and amenity of Eldwick village and those living in the immediate vicinity, and have a disproportionate impact on the community.
- Would result in the loss of the area's village feel and unique identity as well as spoiling its character, creating overpopulation, and impacting on Eldwick's historical, cultural and environmental importance.
- Fields valued by the community for leisure, recreation and enjoyment of the countryside, which would be lost or adversely affected were development to take place.
- Would affect the health and wellbeing of local people, therefore should not be built on a preserved for the future.
- Those living immediately adjacent to the site would be overlooked, experience loss of privacy and overshadowing, which is felt to be unacceptable. Concern potential reductions in property values.
- Objection to potential impacts during and after construction. During construction it was considered that local residents would be experience increased levels of disruption and inconvenience in terms of noise pollution and increased traffic that any works would bring, particularly when installing utilities. Post construction, it is felt that there would be increased levels of traffic, pollution, light pollution, noise, disruption and overloading of local infrastructure**.**
- New development would result in in ceases in crime rates. In addition, it would bring no value to the local community

17. Sustainability/Accessibility:

- Site located more than 15 minutes' walk for the nearest town centre or railway station – contrary to the Council's accessibility targets. Public transport (bus) services viewed as being slow and not well used.
- Due to distance from town centre and railway station, together with topography means residents would use the car to access them**.** Would result in increased traffic volumes on local roads and more air pollution.
- Would contribute towards climate change and impact on the quality of life of residents.
- Site scores a minor positive effects for most socio-economic themed Sustainability Appraisal objects that do not outweigh the disadvantages of allocating it.

18. Housing mix:

- Concerns expressed regarding the whether housing on the site would provide the affordable housing and correct type of housing needed in the area.

- Suggested that affordable housing would not be delivered or make a contribution towards doing so. Homes provided would also be unsuitable and not the correct type for the area.

19. Loss of agricultural land:

- Would result in the loss agricultural/pasture land.
- Land used for animal grazing. Any loss would impact on the food chain and food production, as well as affecting the local farming sector, which is suffering due to lack of pasture land. Green Belt development would exacerbate these issues.
- Moral duty to safeguard the countryside to guarantee the future of the plant.

20. Emerging Bingley Neighbourhood Plan:

- Queried why it had not been taken into account in preparing the Local Plan.

Support:

1. **Proposed site allocation**:
   - Site allocation supported. Would help to address housing issues in Bingley, whilst leaving plenty Green Belt.
   - Would bring benefits to the community in terms of allowing more people to enjoy living in Eldwick and spending their money in local businesses.
   - Hoped that development would include affordable housing.
   - Site noted as being in private ownership and not available for public access.
2. **Site deliverability:**
   - Site allocation supported. Considered to be well located and a logical extension to Eldwick.
   - Exceptional circumstances exist for the site to be released from the Green Belt for development.
   - Would have a moderate impact on the Green Belt.
   - Heritage and environment impacts could be addressed via appropriate design.
   - Site is available, suitable and deliverable with no viability issues.
3. **Proximity to/impact on designated heritage asset:**
   - Site located adjacent to Prince of Wales Park (a Grade II Registered Park & Garden)

- Analysis of the Heritage Impact Assessment and the mitigation proposed within it supported. Are likely to be effective in reducing harm to the asset.

Comment:

1. **Impact on the highway network and road safety:**
   - Heights Lane not wide enough to accommodate additional traffic and did not pavements for pedestrians.
   - Nearby mini-roundabout viewed as being too small and dangerous.

2. **Impact on local infrastructure/services:**
   - Local schools and GP surgeries considered to be overloaded

4. **Proximity to South Pennine Moors (Phase 2) SPA:**
   - Potential to lead to loss of functionally linked land for SPA birds.
   - Support expressed for the approach being adopted in the emerging Local Plan, SPD and assessment to loss of such land.
   - Recommended that allocations should be screened against the model uses to identify the suitability of sites for SPA Golden Plover.
   - Where loss of functionally linked land cannot be ruled out, the plan should include additional text as part of the site allocation requirement

5. **Impact on biodiversity/wildlife and the environment:**
   - Would be an impact on wildlife and increased levels of pollution.

6. **Development of Green Belt land:**
   - Green belt should be protected and left for farming and wildlife.
   - Would result in sprawl.
   - Suggested that there are sufficient alternative, brownfield sites that could be used instead.

7. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

- Adjacent properties experience issues with drainage and flooding.

Representation IDs: 339, 343, 358, 359, 389, 406, 553, 566, 572, 573, 578, 591, 605, 620, 638, 680, 726, 732, 830, 934, 941, 1061, 1157, 1158, 1176, 1185, 1209, 1257, 1262, 1267, 1313, 1320, 1341, 1342, 1356, 1359, 1361, 1420, 1456, 1483, 1589, 1590, 1668, 1673, 1674, 1754, 1844, 1849, 1984, 2154, 2212, 2214, 2302, 2313, 2370, 2377, 2378, 2384, 2757, 2766, 2775, 2791, 3062, 3104, 3348, 3830, 3875, 3896, 3930, 4048, 4063, 4113, 4846, 4947, 5045, 5725, 5741, 5764, 5965, 6047, 6050, 6400, 6964, 7214, 7280, 7320, 7778, 7868, 8026, 8064, 8068, 8111, 8163, 8253, 8417, 8419, 8574, 8636, 8817, 8968, 9191, 9756, 9937, 10038, 10420, 10432, 10471, 10729, 10914, 11013, 11246, 11295, 11308, 11369, 11373, 11751, 11845, 11886, 11888, 11890, 11892, 11894, 11934, 11979, 12148, 12374, 12498, 13065, 13967, 13991, 14176, 14315, 14926, 15486, 15701, 16099, 16114, 16362, 16625, 16731, 16760, 16984, 16999, 17000, 17003, 17686, 17750, 18125, 18158, 18491, 18524, 18660, 18716, 18749, 18780, 18821, 18902, 19041, 19182, 19392, 19393, 19879, 20158, 20162, 20190, 20439, 20577, 20997, 21232, 21278, 21411, 21478, 21491, 21496, 21635, 23669, 23869, 23949, 24002, 24024, 24493, 25319, 25596, 25618, 26557, 26653, 27464, 27647, 28301, 28405, 28573, 28601, 28655, 28706, 29383, 29515, 29530

BI5/H: Crossley Wood Road, Gilstead

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BI5/H: Crossley Wood Road, Gilstead	8	8	3	2	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on biodiversity/wildlife • Impact on air quality • Impact on visual amenity • Impact on Prince of Wales Park • Proximity to and impact on heritage assets • Support for the proposed site allocation • Impact on Leeds and Liverpool Canal • Proximity to Bingley South Bog SSSI • Flood risk/drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission.

Objections:
1. Impact on biodiversity/wildlife: • Site located in close proximity to Bingley South Bog SSSI. • Concern regarding the impact of development on its biodiversity/ecology.
2. Impact on air quality: • Concerns regarding air quality impacts due to the potential for increased traffic.
3. Impact on visual amenity:

- Would be detrimental to the visual amenity of the canal and its surrounding area.

4. Impact on Prince of Wales Park:

- Concern over potential impacts on Prince of Wales Park.

5. Proximity to/impact on heritage assets:

- Site adjacent to the Leeds and Liverpool Canal Conservation Area and a Scheduled Monument.
- Concerns that development harm elements that contribute to the significance of these designated heritage assets.
- An assessment should be undertaken before allocation of the site's contribution towards those elements that contribute towards the assets significance and the impact that development would have.

Support:

1. Proposed site allocation:

- Site considered to be suitable for development,
- Supported subject to care being taken to protecting the canal and its environment, the adjacent woodland and green fields and impacts of construction being minimised.
- Could help to avoid the use of Green Belt land.

Comment:

1. Impact on Leeds and Liverpool Canal:

- Site located at the top of the principal cutting on the Leeds and Liverpool Canal.
- Need to ensure development would not create a surcharge onto the cutting.
- Land stability should be a development consideration.

2. Proximity to Bingley South Bog SSSI:

- References in the site pro-forma to the proximity of the Bingley South Bog SSSI welcomed.
- Suggested that allocation requirements should be clear that planning permission will only be granted if impacts on the SSSI can be avoided or adequately mitigated for.

3. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

- Adjacent properties experience issues with drainage and flooding.

Representation IDs: 2184, 3525, 4697, 4843, 13593, 19919, 28707, 29385

BI6/H: Marley Court, Crossflatts

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BI6/H: Marley Court, Crossflatts	6	6	2	2	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on biodiversity/wildlife • Impact on local infrastructure/services • Proximity of proposed incinerator • Support for the proposed site allocation • Proximity to designated heritage asset • Proximity of the Leeds and Liverpool Canal • Design of development	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission.

Objections:
1. Impact on biodiversity/wildlife: • Site considered to be a wildlife habitat.
2. Impact on local infrastructure/services: • Concerns regarding the suitability of the area's infrastructure (roads, schools, doctors) to cope with additional development.
3. Proximity of proposed incinerator: • Site located within proximity of the proposed incinerator at Marley. • May result in health implications for residents on the site.
Support:
1. Proposed site allocation:

• Site was previously occupied by flats and therefore considered suitable for development. • Will provide high quality affordable homes.
2. Proximity to designated heritage asset: • Site located adjacent to the Leeds and Liverpool Canal Conservation Area. • Reference to the proximity of the Conservation Area in the site pro-forma welcomed. However, it should be re-worded to be more positive.
Comment:
1. Proximity of the Leeds and Liverpool Canal: • Site located at a lower level than the Canal. • May be vulnerable to a breach or leakage. Should be considered in any future flood risk assessment and identified as a development consideration. • Stability of the canal embankment should also be a development consideration.
2. Design of development: • Suggested the policy wording should encourage development with an active frontage to the canal. • Would ensure development has a positive relationship with it and accord with principles relating to the development of Green Infrastructure.

Representation IDs: 1758, 4696, 6534, 13594, 28708, 29387

BI7/H: Whitley Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BI7/H: Whitley Street	4	4	1	2	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on designated heritage assets • Support for the proposed site allocation • Flood risk/drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission.

Objections:

1. **Impact on designated heritage assets:**
   - Site located within the Leeds and Liverpool Canal Conservation Area, but outside the Saltaire World Heritage Site (WHS) buffer area.
   - Concerns that development harm elements that contribute to the significance of these designated heritage assets.
   - An assessment should be undertaken before allocation of the site's contribution towards those elements that contribute towards the assets significance and the impact that development would have.

Support:

1. **Proposed site allocation**:
   - Site allocation supported. Would be a good use of brownfield land.
   - Requested that further consideration be given to the expanding Bingley Grammar School to support housing growth.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 693, 3898, 28709, 29388

BI8/H: West of Heights Lane, Eldwick

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BI8/H: Land west of Heights Lane, Eldwick	178	173	164	8	6

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Location of development • Overall level of development • Impact on the highway network and road safety • Impact on local infrastructure/services • Proximity of Prince of Wales Park and impact on designated heritage asset • Loss of open space/green space • Impact on leisure/recreation • Impact on character and amenity • Impact on landscape and visual amenity • Flood risk/drainage • Pollution • Impact on biodiversity/wildlife and the environment • Conflict with emerging Local Area Strategy and wider policy context • Loss of agricultural land • Sustainability/Accessibility • Impact on climate change/carbon	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H109) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

• Proposed housing density • Housing mix • Local plan consultation process • Support for the proposed site allocation • Site deliverability • Proximity to South Pennine Moors (Phase 2) SPA	

Objections:

1. Development of Green Belt land:

- Objection to development of Green Belt land. Has been designated for several reasons including to prevent sprawl. Should not be developed and continued to be protected/preserved. It was untouchable.
- Green Belt also provides a function to protect wildlife habitats and the countryside. Any loss would cause urban sprawl and encroachment into the countryside and landscape, which is highly valued by the community
- Would be a negative impact on openness. Would set a precedent for further expansion into the Green Belt.
- Council has not produced evidence to demonstrate/justify that there are “exceptional circumstances” for releasing the site from the Green Belt to deliver the area’s housing requirement. The Plan’s approach was “unsound”.
- Suggested that exceptional circumstances did not exist and the proposal was unjustified when there are other brownfield sites that could be used in the area, meaning the that the proposed site could remain as Green Belt.
- Local Plan considered to be contrary to the requirements of the NPPF and therefore “unsound” as there are many non-Green Belt sites in the area that had not been taken into account.
- Noted that the Site Specific Green Assessment state that the site was in moderately performing parcel, making a major contribution to Green Belt purposes with development have major potential for sprawl and moderate impact on openness with no opportunity to create a stronger boundary.
- Proposed site forms part of a buffer on the edge of the village forming a natural boundary to the urban area. Development would result in the erosion of the village boundary and loss an open gateway to the countryside.

- Site noted a being one of the few remaining open spaces left in the community. Felt to be important for the community health and wellbeing, and preserving local character. Development would impact on the village and its surroundings, as well as resulting in a loss for countryside.

2. Location of development:

- There were other, more suitable sites/areas where development could take place without the need to use Green Belt sites.
- Should take place on brownfield/previously developed land, or make use of existing/derelict buildings as well as areas requiring regeneration and other non-Green Belt land.
- Brownfield and previously developed land should be prioritised and the primary focus in line with national policy.
- District has significant quantity of brownfield/previously developed land available to accommodate new housing to meet local needs without using Green Belt/greenfield land or open space, developing the countryside or creating urban sprawl. Would allow the proposed site to remain protected as Green Belt.
- Brownfield/previously developed land (and other non-Green Belt land) had not been taken into consideration when identifying sites in the Local Plan.
- Not using brownfield/previously developed land and buildings would encourage dereliction and emptiness in urban area with consequential issues of crime and vandalism as well as creating a depressing aspect.
- Reference was made to using former mill complexes and the need to address the 4,000 empty dwellings in the District that should be brought back into use.
- There were a number of brownfield and other non-Green Belt sites in Bingley that should be examined and/or allocated.
- Specific sites suggested included the former Police Station/Law Courts, Redundant Church between Alexander Court/Poplar Terrace; land to the rear of Premier Inn; the overflow car park for Computershare; land opposite Bingley Grammar School; Doctors surgery on Kingway; former Chuch at Sandbeds.
- Land made available by redevelopment of the District's hospitals – Bradford Royal Infirmary and Airedale General Hosptial – could be used.
- Suggested that there was available brownfield land and disused buildings in the centre of Bradford that could be converted for housing. Would have better access to transport links, which would to help reduce pollution and traffic congestion, and be close to available infrastructure.

- Redundant office, business and retail space should be used to provide new housing, as due to changing working and retail habits there would be less demand for new space. These premises could then be converted, meaning Green Belt land would not be needed.
- Land identified solely for office development/use should be re-allocated for dual use (housing and offices), whilst town centre diversification has an important to play.
- Noted that several retail developments had taken place in recent years. Land should have been developed for housing instead.
- SHLAA was not complete and not fit for purpose.
- Noted that a review was being undertaken by the West Yorkshire Combined Authority (WYCA) will result in further parcels of non-Green Belt land becoming available for development in the near future, negating the need for Green Belt release to meet housing requirements.

3. Overall level of development:

- Eldwick and Gilstead had experienced a significant amount of residential over recent decades and therefore, did not need further development.
- The area's character had been altered as a result, turning two distinct villages into a suburban type area, with the loss of greenfield sites and coalescence taking place.
- Bingley had had more development in recent years that the other parts of the District. Surrounding areas had also experienced development with the consequent loss of countryside.
- Developed has had a negative impact on the area, resulting in it becoming overpopulated, overdeveloped and unable to accommodate further housing development.
- Would be a first step towards the coalescence of Eldwick and Micklethwaite and create pressure to release more land and encourage ribbon development.
- Further development would impact on the village's character. 40 dwellings, whilst being a relatively number, would create a disproportionate impact on the community.
- National housing targets requiring the release of Green Belt were unreasonable and un-necessary. Queried whether action could be taken locally and nationally to reduce the housing requiring.
- Would be no benefit to the community and further damage to the environment would occur.

- Case of piecemeal allocations on greenfield sites was not cohesive as part of the overall plan. Sites were only included to make up the numbers to meet the overall requirement.
- Sites BI4/H and BI8/H should be considered as a whole as one could not happen without the other.
- Overall requirement was questioned.

4. Impact on the highway network and road safety:

- Significant concerns raised in relation to the impact on the highway network and road safety in the Eldwick/Gilstead area together with its ability to support development. Local roads considered to be unsuitable.
- Area experiences heavy traffic levels to/from and passing through it. Development would add more traffic to the network, exacerbating existing issues. Reference was made to the level of traffic using Otley Road.
- Would create more congestion as well as noise and air pollution resulting from standing traffic, which would impact on the health and wellbeing of residents.
- More traffic would also impact on the character of the area, and create more parking problems.
- Park Lane Roundabout (five leg mini roundabout) experiences high volumes of traffic and viewed as being dangerous. Development would exacerbate these issues. It would not be able to cope and there is not space to expand or improve it.
- Specific concerns raised in relation to dangers to pedestrian crossing the road at/near the roundabout. There are also issues with visibility on the approaches to it, particularly from Heights Lane. There is also a history of accidents.
- Heights Lane considered unsuitable to support increases in traffic arising from development of the site due to its narrow width and limited visibility in places. It does not have any pavements/footpaths, with limited room for one to be provided, as well as not lighting
- Heights Lane used by pedestrians, cyclists, runners and horse riders to access the countryside. Providing a path would reduce available road space and create issues for other users. Reference made to potential impacts on the local riding club.
- Heights Lane presents a risk to the safety of users and resulted in several accidents. Increasing traffic would create further dangers to user's safety and a greater risk of accidents. Vehicle speed is also an issue.
- Lack of pavements would result in new residents using cars to access services and facilities safely. Also it is the only route to reach public transport services. This together with increase danger renders the site unsuitable.
- Noted that Heights Lane had been considered unsuitable in the past as an access to development.

5. Impact on local infrastructure/services:

- Concerns over the impact of further development in Eldwick as well as Bingley, more generally, would have on local infrastructure and services (schools, early years provision, medical/dental services, retail, public transport, roads and utilities).
- Existing infrastructure considered unable to cope with existing demands placed upon it.
- Eldwick Primary School highlighted as being over-subscribed with no capacity and has been expanded to address requirements resulting from recent development. Children living in the priority catchment area already have difficulties in obtaining places.
- Development would mean children having to travel further to reach schools, primarily by car, impacting on the highway network and creating pollution and congestion.
- Secondary schools (Bingley Grammar and Beckfoot) are also oversubscribed.
- Local medical practices are oversubscribed or at capacity, with further development bringing increase demand for GP registrations, place a greater strain on resources and negatively impacting on local people's access to services. Similar situation applies to dental services.
- Public transport services were poor quality and infrequent, meaning residents would use the car to access services and travel to/from work, generating more traffic. This would add to existing issues on highway network in Bingley including creating more congestion contrary to sustainability objcetives/policies.
- Eldwick noted as lacking a railway station, with the nearest (Bingley and Crossflatts) not being accessible on foot. Developing housing within 15 minutes' walk of transport links was not applicable for the Heights Lane sites.
- Traffic volumes and the ability of local roads to cope are a key issue, whilst parking is inadequate, adding to/creating congestion
- Development would impact on water supply and waste water infrastructure as it be overload them. Flooding problems relating to the sewage system, particularly on Heights Lanes were noted, whilst the area suffers from low water pressures, low quality mobile and internet connections. Local shops are inadequate for the current population
- Suggested that no further development should occur given infrastructure capacity constrained or that it should not take place without improvements.

6. Proximity of Prince of Wales Park:

- Site located adjacent to Prince of Wales Park (a Grade II Lister Registered Park). Site would result in adverse or negative impacts on, or damage to the park, its setting and immediate surroundings. Considered to be a sensitive heritage asset.

- Park was noted as an important amenity/resource and space for the community, providing opportunities for recreation and relaxation, and supporting health and wellbeing. Development would spoil the park and result in the loss of the sense of peace and tranquillity it provides.
- Further housing and increased traffic accompanying it would negatively affect the park in terms of noise and air pollution.
- Park considered to be wildlife habitat, being home to a range of birds and animals, and forming part of green/nature corridor linking the urban area with the countryside.
- Green/nature corridor would be inhibited by development, which would have a negative on the wildlife present in the park. Would be a loss of the sense of nature that the park provides.
- Long distance views over the countryside to/from the park would be spoiled by, or lost as a result of, development. Visual amenity would be reduced.
- Potential impact on the heritage asset formed by the park. Council's assessment states that loss of the greenfield site would be likely to have a negative impact upon the local landscape and townscape, particularly with the potential to impact heavily on its setting. Historic significance should be protected.

7. Loss of open space/green space:

- Concerns over the loss of green spaces/open spaces due to development.
- Proposed site and surrounding countryside is valued by the community.
- Would impact on those using the area for recreation,
- Space helps to distinguish Bingley from Eldwick.
- Open spaces and landscapes should be protected.

8. Impact on leisure/recreation:

- Heights Lane noted as being well-used by residents for recreational activities (walking, cycling, running and horse riding) and providing access to the open countryside.
- Development would impact negatively on those using the area for exercise, recreation and accessing the countryside.
- Would affect long distance views and wildlife.
- Reference made to the presence of a riding club on Heights Lane. Concerns that development would adversely affect it and make access to it more difficult.

- Site should not be allocated and remain accessible for outdoor activities and countryside leisure.

9. Impact on character and amenity:

- Development would impact on the community including those living in the immediate vicinity. This impact would be negative for the whole community and detrimental to surrounding area.
- Would also have a detrimental impact on residents as well as the village, nature and the wider environment.
- Would result in the loss of community identity, adverse impacts on health and wellbeing and add to a feeling of being crowded by housing. Peace and enjoyment of the area would also be impacted upon.
- Would also affect Eldwick's historical, cultural and environmental importance, whilst the unique identity of the Airedale area would be impacted by increased housing growth.
- Culture would be devalued and Bingley's historic environment further altered.
- Those living immediately adjacent to the site would be overlooked, experience loss of privacy and overshadowing – something that would be unacceptable. New housing would be out of scale and overbearing. Concern potential reductions in property values.
- Objection to potential impacts during and after construction. During construction it was considered that local residents would be experience disruption. Post construction, there would be increased levels of traffic, pollution and noise**.**
- New development would result in increases in crime rates. In addition, it would bring no value or gain to the local community
- Benefits provided by this area outweigh any possible advantages from the proposals within the Plan

10. Impact on landscape and visual amenity:

- Development would have a negative impact on the appearance of the landscape as well as the adjoining townscape.
- Area has a natural beauty that is much valued and should not be lost.
- Development would lead to an increase sprawl, taking growth beyond the natural boundary for the settlement, blurring the interface between the urban and rural areas. In addition, there would be impacts on Prince of Wales Park.
- Would have negative impacts of, or result in loss of views across the wider landscape and countryside, in particular to/from Prince of Wales Park and from Heights Lane. These views were considered important to local people and their wellbeing.
- Would also result in the loss of longer distance views, including between the site and East Morton/Micklethwaite.

11. Flood risk/drainage:

- Site and surrounding area experiences flooding and problems with the drainage being overloaded, affecting nearby properties.
- Specific reference made to flooding on Heights Lane and Otley Road during periods of heavy rain and the inability of the drainage network to cope. More houses would add to these problems.
- Issues experienced with run-off from the site and major drainage problem at the south eastern corner of site BI4/H, which necessitate the installation of new pipes along Heights Lane.
- Underground springs present on the site. Also forms an area of bog land.
- Green Belt areas provide opportunities to absorb water and reduce flood risk elsewhere. Should be retained and remain intact.
- New drainage networks must be maintained.
- Would generally result in increased flood, in particular pluvial flooding due to loss of open fields and introduction of hard materials. More flooding would damage properties.
- Surface water run-off would also increase, whilst there were concerns development would lead to flooding elsewhere in Bingley and the Aire Valley.
- Drainage network would be overloaded/overwhelmed, as would the sewage system.

12. Pollution:

- Would result in increased pollution levels in the area from a range of sources – noise, air, traffic and environmental pollution.
- Light pollution for buildings would harm local wildlife.
- Presence of a historic landfill site in the area that emits radon noted**.**
- Potential for ground contamination to occur resulting from development at the nearby Local Wildlife Site and Listed Park.

13. Impact on biodiversity/wildlife:

- Proposed and surrounding area (including Prince of Wales Park) was an important wildlife habitat and home to range of animals, birds, insects, plants and trees, some of which are endangered.
- Curlews, Lapwings, Thrushes, Pheasants, Owls, birds of prey, deer, bat, hedgehogs, palamate newts and stoats highlighted as being present on the site or in the surrounding area.
- Development would result in negative and/or significant impacts on wildlife and biodiversity including a reduction/loss of biodiversity habitats, species and feeding opportunities for wildlife. Recent development (the Swan Estate) had seen a reduction in wildlife.

- Wildlife would be affected by increased noise and transport pollution, whilst there was concern about the introduction of domestic pets to the area and their impacts.
- Wildlife, habitats, trees, plants and the countryside should be protected for the future. Green space/open spaces were also important for the community's health and wellbeing.
- Site is part of wildlife corridor providing a link for species present in Prince of Wales to/from the wider countryside and the moorland beyond. The corridor would be obstructed and impact on the habitat network.
- Site is located with the 2.5km buffer zone for the South Pennine Moors SPA/SAC and SSSI. Concerns over potential adverse impacts of development on these protected areas.
- Site close to a Local Wildlife Site (LWS) with potential to impact on its setting.
- Obligations to safeguard the South Pennine Moors not met within the Plan, meaning it was not sound.
- Site should be maintain to preserve habitats for moorland mammals and birds.

14. Conflict with emerging Local Area Strategy and wider policy context:

- Development would not meet and/or conflict with elements of the proposed Local Area Strategy for Bingley, particularly those relating to the overall environmental objective of protecting or enhancing the natural/green environment including valued landscapes, and the conservation/enhancement of heritage assets and their settings.
- Site conflicts with Core Strategy Policy SC5.
- Inconsistent with green policies and the broader concept of the Green Belt.
- Queried why the site was being considered when under greater understanding of the ecological and environmental necessity of the countryside and preserving nature.
- Other concerns were the detrimental effect on global warming and ecosystems caused by the loss of wildlife, impacts on the open countryside and the effect of light pollution from new dwellings.
- Plan does not take into account societal, economic and demographic shifts resulting from Brexit and COVID-19.

15. Loss of agricultural land:

- Would result in the loss agricultural/pasture land.
- Land used for animal grazing. Any loss would impact on the food chain and food production, as well as affecting the local farming sector, which is suffering due to lack of pasture land. Green Belt development would exacerbate these issues.

16. Sustainability/Accessibility:

- Site located more than 15 minutes' walk for the nearest town centre or railway station – contrary to the Council's accessibility targets.
- Due to distance from town centre and railway station, together with topography means residents would use the car to access them**.** Would result in increased traffic volumes on local roads and more air pollution.
- Would contribute towards climate change and impact on the quality of life of residents.
- Site scores a minor positive effects for most socio-economic themed Sustainability Appraisal objectives that do not outweigh the disadvantages of allocating it.

17. Impact on climate change/carbon:

- Would contribute towards climate change.
- Fields play a role in absorbing and storing carbon, contributing towards achieving a low or zero emissions target. Queried how the Council could justify the removal of land that contributes to carbon capture.
- Is a need to invest in existing buildings, together with new sustainable housing that supports a commitment to the natural world and the climate emergency.
- Natural resources should be protected.
- Was a moral duty to safeguard the countryside to guarantee the planet's future.

18. Proposed housing density:

- Proposed density on Green Belt sites was noted as being much lower than expected/required under Policy HO2.
- Not accepted that the level of greenfield allocations was necessary to support the delivery of development outlined in the Local Plan, including in Bingley.
- Suggested that densities should be increased on other more sustainable sites and the size of the Green Belt/greenfield allocations reduced.

19. Housing mix:

- Concerns expressed regarding the whether housing on the site would provide the affordable housing and correct type of housing needed in the area.

- Suggested that affordable housing would not be delivered or make a contribution towards doing so. Homes provided would also be unsuitable and not the correct type for the area. They would be larger and more expensive as the land is a prime building plot.
- Sites BI4/H and BI8/H should not be treated separately. Treating them individually would allow the need to provide affordable housing to be avoided.

14. Local plan consultation process:

- Had not been undertaken in accordance with procedural requirement, and therefore, was not sound.
- Was of poor quality and had taken place too quickly
- Decisions should be based on correct information.

Support:

1. Proposed site allocation:

- Site allocation supported. Would help to address housing issues in Bingley, whilst leaving plenty Green Belt.
- Would bring benefits to the community in terms of allowing more people to enjoy living in Eldwick and spending their money in local businesses.
- Hoped that development would include affordable housing.
- Site noted as being in private ownership and not available for public access.

2. Site deliverability:

- Site allocation supported. Considered to be well located and a logical extension to Eldwick.
- Exceptional circumstances exist for the site to be released from the Green Belt for development.
- Would have a moderate impact on the Green Belt.
- Heritage and environment impacts could be addressed via appropriate design.
- Site is available, suitable and deliverable with no viability issues.

3. Proximity to/impact on designated heritage asset:

- Site located adjacent to Prince of Wales Park (a Grade II Registered Park & Garden)

- Analysis of the Heritage Impact Assessment and the mitigation proposed within it supported. Are likely to be effective in reducing harm to the asset.

Comment:

1. **Impact on the highway network and road safety:**
   - Concern raised in relation to the impact on the highway network and road safety in the area.
   - Area experiences constant busy traffic flows. Development would add more traffic to the network, exacerbating the issue.
   - Heights Lane not wide enough to accommodate additional traffic and did not pavements for pedestrians.
   - Nearby mini-roundabout viewed as being too small and dangerous.
2. **Impact on local infrastructure/services:**
   - Local schools and GP surgeries considered to be overloaded
3. **Impact on biodiversity/wildlife and the environment:**
   - Would be an impact on wildlife and increased levels of pollution.
4. **Development of Green Belt land:**
   - Green Belt should be protected and left for farming and wildlife.
   - Development would result in sprawl.
   - Sufficient alternative, brownfield sites that could be used instead.
5. **Proximity to South Pennine Moors (Phase 2) SPA:**
   - Potential to lead to loss of functionally linked land for SPA birds.
   - Recommended that allocations should be screened against the model uses to identify the suitability of sites for SPA Golden Plover.
   - Where loss of functionally linked land cannot be ruled out, the plan should include additional text as part of the site allocation requirement
6. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
- Adjacent properties experience issues with drainage and flooding.

Representation IDs: 344, 357, 360, 390, 405, 407, 424, 554, 567, 571, 592, 606, 621, 681, 725, 727, 733, 933, 944, 1062, 1137, 1159, 1190, 1258, 1263, 1316, 1321, 1343, 1372, 1669, 1755, 1985, 2156, 2300, 2315, 2371, 2379, 2385, 2388, 2397, 2767, 3069, 3105, 3370, 3535, 3841, 3897, 3931, 4114, 4214, 4941, 5046, 5735, 5742, 5747, 5966, 5992, 6026, 6048, 6051, 6109, 6111, 6401, 6914, 6966, 7078, 7215, 7260, 7282, 7287, 7779, 7869, 8069, 8112, 8164, 8254, 8418, 8420, 8575, 8637, 8818, 8969, 9192, 9757, 9938, 10039, 10429, 10435, 10472, 10915, 11014, 11247, 11296, 11309, 11374, 11752, 11846, 11887, 11889, 11891, 11893, 11895, 11935, 11980, 12149, 12375, 12501, 13033, 13066, 13968, 13995, 14177, 14316, 14927, 15487, 15702, 16101, 16115, 16363, 16626, 16758, 16789, 16985, 17001, 17004, 17687, 17760, 18115, 18126, 18159, 18492, 18525, 18661, 18715, 18750, 18781, 18822, 18903, 19042, 19183, 19394, 19880, 20159, 20163, 20191, 20440, 20578, 20998, 21233, 21279, 21412, 21479, 21492, 21497, 21636, 23670, 23870, 23950, 24003, 24025, 24494, 25320, 25597, 25619, 26558, 26654, 27465, 27648, 28302, 28363, 28406, 28574, 28602, 28657, 28710, 29389, 29516, 29548

BI9/E: Castlefields Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BI9/E: Castlefields Road	3	3	2	1	0

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage • Support the employment site allocation	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission

Objections:

1. **Flood risk/drainage:**
   - Area floods regularly and should remain as a flood area rather than increasing the risk to homes and businesses.
   - Site is wholly or mostly within current/draft Flood Zones 3b (FZ3b) or 3a(i) (FZ3a(i)) and known to be at risk.
   - Should not be allocated until the SFRA provides sufficient data on flooding and a clear FZ3b designation.

Support:

1. **Site allocation:**
   - Would be a good employment site with access from Castlefields Road.
   - Heritage aspects of the site should be given due consideration, in particular conservation of the mill race running through the site.

Comment:

No representations received setting out comments.

Representation IDs: 4789, 27933, 28701

BI10/E: John Escritt Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BI10/E: John Escritt Road	2	2	0	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proximity to Bingley South Bog SSSI • Flood risk/drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission

Objections:

No representations received in objection.

Support:

No representations received in support.

Comment:

1. **Proximity to Bingley South Bog SSSI:**
   - Site is within 200m of Bingley South Bog SSSI.
   - Further assessment of the likely impacts relating to air pollution, discharges and water supply should be undertaken.
   - Recommended that site requirements identify this constraint and include requirements for habitats to be avoided, mitigate or adequately compensated, for where appropriate.
2. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
   - Adjacent properties experience issues with drainage and flooding.

Representation IDs: 19922, 28702

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 101 within the consultation document.

Summary of Consultation

A total of **46** representations were received in relation to Question 101 from **13** respondents. Respondents included Highways England, local residents, the Town Council and a landowner/agent (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.6**.

Question 101 – Bingley Preferred Site Allocations

Table 0.5: Consultation Question 101: Bingley Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q101	13	13	11	1	1

Table 0.6: Consultation Question 101: Bingley Preferred Site Allocations -Summary of Representations Received

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Proposed site allocations BI4/H & BI8/H • Impacts on the community • Impact on local infrastructure/services • Exclusion of site - West of Heights Lane (SHLAA Ref: BI/013) • Exclusion of site – Gilstead Water Works (SHLAA Ref: BI/021)	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

• Exclusion of site – Land off Micklethwaite Lane (SHLAA Ref: BI/050) • Exclusion of site – West of Heights Lane (SHLAA Ref: BI/059): • Support for the proposed site allocations • Comment on impact on the highway network	

Objections
1. Development of Green Belt land: • Green Belt/greenfield land should be protected/preserved to stop urban sprawl, adverse impacts on the natural environment and landscape, impacts on biodiversity, wildlife habitats and species. • Considered to be sufficient brownfield sites within Bradford had yet be developed and as such should be the main focus. • Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed.
2. Proposed site allocations BI4/H & BI8/H: • Sites are important wildlife habitats and home to a range of animals and birds, supported by them. • Each field represented an eco-system. • Important areas of local residents to walk.
3. Impacts on the community: • Eldwick/Gilstead considered to be over-crowded and suffering from traffic congestion. • Would lead to more traffic car use/ with implications for air quality, climate change and quality of life**.**
4. Impact on local infrastructure/services: • Local infrastructure was considered to be at capacity, meaning that development should be limited without further improvements
5. Exclusion of sites:

- **West of Heights Lane (SHLAA Ref: BI/013):**
    - Object the exclusion of the remainder of the site (western section) when it was considered suitable in the Strategic Land Assessment (SLA).
    - Considered to be well located and a logical extension to Eldwick.
    - Exceptional circumstances exist for the site to be released from the Green Belt for development.
    - Would have a moderate impact on the Green Belt.
    - Heritage and environment impacts could be addressed via appropriate design.
    - Site is available, suitable and deliverable with no viability issues.
- **Gilstead Water Works (SHLAA Ref: BI/021):**
    - Identified as having potential for residential development in the Masterplan work support the emerging Neighbourhood Plan, but rejected from the Local Plan process.
    - Site is not Green Belt and could provide the dwellings proposed on site allocations BI3/H, BI4/H and BI8/H instead.
- **Land off Micklethwaite Lane (SHLAA Ref: BI/050)**
    - Should be added as a housing allocation in the Local Plan and released from the Green Belt.
    - Considered to have minimal landscape impact and would not have an impact on the setting of a Listed Building or on both Conservation Areas.
- **West of Heights Lane (SHLAA Ref: BI/059):**
    - Object the exclusion of the remainder of the site (western section) when it was considered suitable in the Strategic Land Assessment (SLA).
    - Considered to be well located and a logical extension to Eldwick.
    - Exceptional circumstances exist for the site to be released from the Green Belt for development.
    - Would have a moderate impact on the Green Belt.
    - Heritage and environment impacts could be addressed via appropriate design.
    - Site is available, suitable and deliverable with no viability issues.

Support

1. Proposed site allocations: • Considered that there were no locations in Bingley parish to build housing that were not in the Green Belt. • Sensible development on the Green Belt would create homes for future residents and result in Bingley still being surrounded by fields and Green Belt. • Settlement coalescence was not supported, whilst development must be supported by suitable road infrastructure.
Comments
1. Impact on the highway network: • Development in Bingley would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

Representation IDs: 334, 467, 1204, 1351, 2334, 2483, 3891, 4359, 15490, 16988, 23671, 23672, 30026

2.79 COTTINGLEY

Introduction

The Local Plan settlement hierarchy identifies Cottingley as a Local Service Centre. The District's Local Service Centres form the fourth element of the settlement hierarchy in the local plan (Policy SP3) and provide services and facilities that serve the needs of, and are accessible to, people living in the surrounding rural areas. Based on this it is proposed that the settlement has a housing target of 150 dwellings. A single housing allocation was proposed to deliver this development requirement.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Cottingley's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as question 102 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **35** representations were received in relation to the Cottingley portrait and Local Area Strategy (Question 102) from **33** respondents. Respondents included Highways England, local residents, a local Conservation Green Belt group, a housebuilder and a Ward Councillor. **Table 0.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.2**.

Table 0.1: Consultation Question 102: Cottingley Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
102	Cottingley Portrait & Local Area Strategy	35	33	31	1	2
	Totals	**35**	**33**	**31**	**1**	**2**

Table 0.2: Summary of Representations Received - Cottingley Portrait & Local Area Strategy

Cottingley Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
102	Cottingley Portrait & Local Area Strategy	35	33	31	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Location of development • Overall level of development • Proposed site allocation • Impact on the highway network • Impact on road safety • Impact on local infrastructure/services • Flood risk/drainage • Impact on biodiversity/wildlife • Pending planning application and planning history • Impact on pollution and health/wellbeing • Consultation process • Local Area Strategy • Overall level of growth • Site access to proposed site CO1/H • Existing planning permission granted at Sun Inn for 18 dwellings	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy CO1: Cottingley, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

Summary of Representations
Objections
1. Location of development: • No need to develop on Green Belt/greenfield land (including the proposed site) as there are plenty of suitable, available brownfield sites including derelict/vacant land and buildings across the Bradford area especially in the City Centre and Shipley. These could be used through conversion and/or redevelopment. • Brownfield sites should be a priority for the Council with greater efforts put into reusing them, rather than focussing on Green Belt. Would be more beneficial to the community. • Greater consideration should be given to more residential development within the City Centre utilising former retail and office/business premises left vacant due to the impact of changing shopping and working patterns arising from the COVID-19 pandemic. • Other suggestions include using funding to make improvements to derelict buildings to render them suitable for residential use, use unoccupied dwellings and reuse of mill sites. Would allow for smaller, more sympathetic developments to take place. • Brownfield sites were overlooked as they were not viewed as attractive to the development industry.
2. Overall level of development: • Concerns expressed the overall level of development being proposed for Cottingley and the surrounding area. Queried whether further housing was needed, with some conclusion that it was not required. • Plan for Cottingley needed to be examined in the context for proposals in the surrounding area – Allerton, Bingley, Heaton, Sandy Lane and Shipley, particularly in relation to the wider impacts on infrastructure, green space and highways. • Considered that parts of the electoral ward were the subject of larger quantities of Green Belt release than others – Cottingley with 150 dwellings compare to Harden with 44 dwellings. • Suggested that there was no need for further housing development on brownfield or Green Belt sites in the BD16 postcode area as there were other areas where capacity should be used instead e.g. the Hallmark Cards site or in Baildon and Shipley. • Proposed requirement of 150 dwellings was queried. • Mismatch between the proposed requirement and the proposed capacity of the March Cote Lane site (155 dwellings) • Noted that the recent planning permission for 18 dwellings on the site of the former Sun Inn public house and other potential developments had not been taken into as part of the Plan.
3. Proposed site allocation:

- Considered to be an ill-thought out proposal and when combined with the proposals for Shipley would be unacceptable. Developing the site viewed as being contentious in the local area.
- Provision of a single site allocation (site CO1/H) considered to be inappropriate.
- Would be inappropriate in terms of meeting the overall housing requirement and providing a mix of sites.
- Suggested that two site allocations should be include as part of the Local Area Strategy. Would help to ensure that the plan is effective and justified
- Land at Hazel Beck/Shipley Golf Course (SHLAA Ref: CO/006) put forward as this additional site and should be allocated in the Plan.

4. Impact on the highway network:

- Objection to further development in Cottingley (including proposed site CO1/H) and the surrounding area due to the ability of the local highway network to support it and the impacts that it would have.
- Queried whether any assessment of the impacts on the highway network had been undertaken. Clarification was sought regarding whether plans would be put in place to improve vehicular access and whether more roads would be built to ease congestion.
- Existing highway network considered to be heavily trafficked and congested, especially at peak times, causing difficulties travelling through the area.
- Existing roads cannot cope with current traffic levels. The junction of Manor Road/Cottingley New Road and entry to Lysander Way were highlighted as two points were congestion regularly occurs.
- Development would result in a significant increase in traffic levels in the area, adding to existing problems and creating more delays and congestion. Particular reference was made to potential impacts of the level of traffic that would use Cottingley Cliffe Road.
- Due to levels of car ownership and lack of public transport, residents would drive to access jobs or services. More traffic would lead to increases air and traffic pollution.
- Roads surrounding the March Cote Lane site considered to be congested and difficult to navigate due to on-street parking. They are also narrow in nature. Concerns were expressed regarding the ability of emergency vehicles to access the site due to this.

5. Impact on road safety:

- Concerns expressed regarding road safety, in particular that of pupils walking to the primary school. The area has experienced several serious accidents in recent years.
- Accidents would increase, as would the risk to pupils walking to the primary due to greater levels of traffic from the construction and occupation of the proposed dwellings. Queried how these pupils would be protected.
- Other safety concerns derive from the parking issues during school drop of/pick up times. Lack of parking causes vehicles to park on the surrounding roads, causing passing vehicles to use the wrong side of the road.

6. Impact on local infrastructure/services:

- Concerns regarding the ability of local infrastructure and services to support further development in Cottingley and the surrounding area
- Existing infrastructure including schools, GP services, public transport, local amenities (shops etc), waste collection and roads cannot cope or was considered to be lacking. It was noted that the existing infrastructure was designed to cater for a village. Further development would place increased pressure upon it.
- Queried whether any assessment had been undertaken to identify and address the impacts on local infrastructure and services. Suggested that the plan had not mentioned the need to improve local amenities such as the need for new play equipment at the local playground.
- Local schools (primary and secondary) considered to be at capacity or oversubscribed, with existing residents struggling to obtain places**.** Noted that schools in the area drew pupils from a wider catchment, creating traffic problems.
- Similar concerns expressed in relation to GP/medical and dental provision. Queried how additional capacity to support schools and GPs would be obtained and delivered.
- Transport was not considered to be good due issues with road network and limited public transport services. Other infrastructure such as drainage also requires improvement.
- Insufficient or capacity in the area to accommodate more cars, more roads, more schools and more GP surgeries.

7. Flood risk/drainage:

- Cottingley area, including proposed site allocation CO1/H, highlighted as experiencing issues with flood risk, particularly during periods of heavy rain.
- Queried wither any risk assessment in relation to flooding in the area and within the vicinity of the River Aire had been undertake. Also questioned what mitigation measures would be put in place to protecting existing and future dwellings from flooding and reduce problems elsewhere.
- Proposed site CO1/H floods regularly and acts an area to hold run-off from higher ground. Water was known to run-off into adjacent gardens and has affected nearby properties.
- Development would result in increased flood risk as the fields would no longer be available to hold water, meaning new dwellings would susceptible to flooding. Existing properties would also be adversely affected.
- Suggested that development would have the potential to increase flooding elsewhere in the area, particularly downstream of the proposed site (CO1/H) as well as along the River Aire.
- Ground conditions mean that the use of soakaways within proposed site CO1/H would not be a viable drainage option. Raised floor levels, no under floor electrics and landscaping to allow water to pond would not address impacts on adjacent properties.

- Existing drainage network considered unable to cope with increased water levels and had not been managed appropriately. Development would have implications for the drainage network.
- Area, including proposed site CO1/H, already experiences issues with surface water flowing onto the surrounding road network through adjacent properties during heavy rain. Development meant the loss of natural drainage, making the issue worse.
- Cottingley Beck cannot accommodate increase water levels and run-off. Noted that a retaining wall had been damaged, please adjacent properties at risk.
- Existing residents should not be made to pay for "riparian ownership" issues relating to excess water flow or blockages that could compromise existing culverts that may arise from the construction and occupation of any dwellings

8. Impact on biodiversity/wildlife:

- Development would impact on wildlife and biodiversity
- The fields (including proposed site CO1/H) noted as being home to a range of animals, birds (some of which are considered threatened), and plants that would be impacted upon, lost or driven out by development. Habitats and food sources would also negatively be impacted upon. Specific reference was made to deer, hedgehogs, amphibians, reptiles, owls, otters, butterflies, moths, curlews, lapwings and skylarks being present**.**
- Queried whether any wildlife habitat assessment had been undertaken.
- The area around Cottingley was highlighted as acting as a wildlife corridor.
- Agricultural land would be lost together with naturals view and community identity.
- Removal trees in Cottingley Wood had resulted in flooding to nearby properties.

9. Location of development:

- Suggested that there are sites in other locations that should be developed instead of using greenfield land in the Cottingley area.
- there were brownfield sites available in Shipley and derelict places in Bradford that could be developed.
- Greenfield sites were being developed when run down properties were being left.

10. Pending planning application:

- Over 200 objections were previously registered against the recent planning application submitted in 2019 on proposed site CO1/H. A number of unresolved issues and objections still remain and have not been addressed.

11. Impact on pollution and health/wellbeing:

- Concerns expressed over the impact of proposals on pollution and the health/wellbeing of local residents.

- Increases in traffic resulting from development would be coupled with harmful rises in air and noise pollution. The latter would be detrimental to wildlife.
- Physical and mental health would also be affected negatively – more vehicles will equal more air pollution which in turn could impact on those with respiratory conditions.

12. Planning history:

- Issues raised in objection to proposals put forward in the mid 1980's relating to highways and drainage were still relevant and had not been addressed.

13. Consultation process:

- Should have been delay to all residents to be informed and wider methods of publicity used e.g. writing to residents to outline the plan and its implications.
- Community not sufficiently engaged.

Support

1. Local Area Strategy:

- Local Area Strategy was supported, however the proposed housing requirement – 150 dwellings – was questioned, as it appeared to be more than the identified need.
- Plan suggested that the remaining requirement is 147 dwellings at most.
- Encouraging more dwellings than identified requirement would mean more land is removed from the Green Belt than needed and be inconsistent with the Council's objectives as well as contradicting the direction of other strategies for Cottingley.

Comments

1. Impact on the highway network:

- Considered that development in Cottingley on its own would not have a severe impact on the capacity, operation and safety of the Strategic Road Network.
- Noted that any impacts would be identified as part of the transport evidence being prepared by the Council, including wider cumulative impacts of growth outlined in the Plan
- Area suffers from congestion from residential traffic, and plan does not provide improved roads. Increase in traffic would be bad for air quality, health and living standards.

2. Overall level of growth:

- Concerns over the proposed level of growth for Cottingley, in particular the impacts of proposed site allocation CO1/H.

- Proposal for 155 dwellings too large for the area. Would increase the size of the village by almost 10%.

3. Flood risk/drainage:

- Development of proposed site allocation CO1/H would have implications for surface water flooding and the need to expand existing culverts with the potential for riparian ownership implications.

4. Impact on local infrastructure/services:

- The ability of local infrastructure (local schools and GP provision) to support further growth was also raised. Both were considered to be at capacity.
- Children would have to travel further to access school provision whilst there would be a long term impact on the NHS Trust's ability to provide services as required.
- An increase in population would not supported by the local infrastructure.

5. Site access to proposed site CO1/H:

- Access to site CO1/H from the highway network within its vicinity and the surrounding area was a key concern, in particular from March Cote Lane and/or the surrounding narrow estate roads.
- Not considered suitable or feasible to accommodate more traffic. Would have implications on the surrounding highway network e.g. at Cottingley Bar.
- Improvements not proposed or possible within the wider area e.g. widening of Cottingley Moor Road/Lee Lane or inability to improve the road through Sandy Lane village.
- Previous highway authorities had opposed development on the site due to traffic and road safety issues, with March Cote Lane and Lysander Way not being used as exits for additional dwellings. This approach should be taken into account rather than disregarded.

6. Existing planning permission:

- Plan does not take into consideration, the planning permission granted at Sun Inn for 18 dwellings.

Representation IDs: 130, 468, 871 ,1063 1186, 1846, 2092, 2383, 2398, 2472, 2621, 3497, 3566 ,3894, 4137, 4284, 4416, 4427, 4534, 4576, 4768, 4808 ,4929, 5121, 5398, 5719, 5790, 5955, 9699, 15491,17058, 17175, 21384, 23574, 28989

Sites

As highlighted above, a single site was put forward in the Preferred Options document to meet the proposed residential development requirements for Cottingley. Respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **130** representations were received in relation to proposed site allocation CO1/H: March Cote Lane from **124** respondents. Respondents included Government bodies (Environment Agency, Historic England and Natural England), local residents, Bingley Town Council, CPRE, a local conservation group, a developer, a Member of Parliament and two Ward Councillors. **Table 0.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.4**.

Table 0.3: Cottingley Proposed Site (CO1/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CO1/H: March Cote Lane	130	124	124	1	5
Totals	**130**	**124**	**124**	**1**	**5**

Table 0.4: Cottingley Proposed Site (CO1/H) - Summary of Representations Received

CO1/H: March Cote Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CO1/H: March Cote Lane	130	124	124	1	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Overall level of development • Housing mix • Impact on local infrastructure/services • Impact on the highway network • Site access • Impact on highway safety • Flood risk/drainage • Impact on biodiversity/wildlife • Loss of open space/green space and impact on health/wellbeing • Impact on character and amenity • Design of new housing • Loss of agricultural land • Impact on the wider environment and climate change • Consistency with policy • Pending planning application • Impact on designated heritage assets • Support for the proposed site allocation	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H249 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

• Existing planning permission granted at Sun Inn for 18 dwellings.	

Summary of Representations
Objections:
1. Development of Green Belt land: • Site is located within the Green Belt, and as such development should not be permitted, meaning that it should continue to remain as it is and protected for the future. • It seeks to check unrestricted sprawl and prevent settlements merging, and should continue to be preserved for these purposes. Would help to prevent settlements, like Cottingley, from their unique identities. • Development would of the site affect the Green Belt's openness and its permanence as well as leading major risk of sprawl. It is not considered a natural infill area. • Contrary to the Local Plan's strategic objectives as well as local/national priorities on sustainability, climate change and the environment. • Noted that there were a number of other proposals in the Local Plan for development in the Green Belt on the western edge of Shipley and several recent developments in the Nab Wood (a new crematorium) and Allerton Lane areas, resulting in the erosion of the Green Belt in the wider area. • It had not been demonstrated that were exceptional circumstances for releasing Green Belt land and was considered that there were other sites that could be used instead. The Local Plan indicating a preference for the redevelopment of brownfield sites. • Every brownfield should be developed first before Green Belt areas were identified. Would mean that development of the proposed site would be unsustainable before every other brownfield site in Bingley is used. • Green Belt and the countryside were valued by the community, contributing to its attractiveness as a place to live as well as supporting health/wellbeing and allowing access to the countryside and wildlife. The site should be preserved for local people to enjoy. More Green Belt was needed to provide more open/green spaces. • Development would set a precedent for further encroachment into the Green Belt, particularly between Cottingley and Sandy Lane, resulting in the loss of open space between settlements, something that was deemed unacceptable. Preserving it would maintain the gap between the settlements. • Site Specific Green Assessment noted that the site would have a major potential for sprawl and have a major impact on openness with no opportunity to create a stronger boundary.

- Suggested that to create a stronger boundary, development could be restricted to western section of the site with a buffer being provided in the eastern section.
- The value of the Green Belt designation was questioned, when decisions could be taken to change it contrary to the views of local people, whilst the differing levels of proposed development in Green Belt and the reasoning for it in different parts of the electoral ward was queried.
- Would be wrong to remove the Green Belt status solely to provide affordable/social housing.

2. Overall level of development:

- Concerns over the overall level of housing growth proposed in Cottingley and the surrounding area, as well as the need for it.
- Cottingley cannot handle further growth at the level proposed and the overall approach of the Local Plan was poorly thought out.
- Further housing should not take place in the area there was no need. There were plenty homes in the area, meaning no need for building on fields or woodlands. New housing would not be positive of sustainable.
- Cottingley considered to be large enough without 155 dwellings being added to the settlement. It was noted that there were 700 homes for sale within a three-mile radius of the site, obviating the need to develop on the Green Belt.
- The housing requirement should be area would be a maximum of 135 dwellings rather than 155. Proposed site CO1/H was considered to be too large.
- A number of site were proposed in Cottingley, Shipley and Bradford that would have a range of impacts on Cottingley. In addition, a number of developments had been granted planning permission or were under construction in neighbouring areas.
- The number of dwellings being built at the Sun Inn should be removed from the overall requirement.

3. Housing mix:

- Should ensure that if development takes place, it includes sufficient quantities of social housing.

4. Impact on local infrastructure/services:

- Concerns expressed regarding the ability of local infrastructure and services to accommodate further growth and the impact that it would have upon them.
- Existing infrastructure is considered to be insufficient and could not cope with/support the scale of housing proposed. In some cases, it was felt to unavailable or at saturation point.
- Queried how much consideration had been given to the requirements for health and education provision arising from development. Was considered adding further housing to the settlement without investment in infrastructure would result in long term damage to the community.

- References were made to the capacity of local primary and secondary schools and the availability of places. The schools, particularly Cottingley Primary School, were felt to be full/at capacity or over-subscribed. The primary school was noted as having a waiting list for places.
- Further development in Cottingley and Shipley would overload the school and result in it struggling to cope with increased demands. Combined with existing capacity issues, education provision was inadequate, meaning local people being unable to obtain places for children, leading them to travel to attend schools elsewhere.
- Specific reference made to comment from the Council's Education Service on the recent planning regarding school capacity.
- Noted that the schools are attended by pupils from a wide catchment area, which causes traffic and congestion around the primary school. Parking at the primary school is also an issue, with further cars adding to existing difficulties.
- GP/medical and dental services were also considered to constrained. The GP surgery was viewed as being full and/or oversubscribed, with residents having difficulties in obtaining appointments.
- Further development in Cottingley and on the western edge of Shipley would result in the GPs becoming overloaded, and struggling to cope due increased demand. This would impact on existing residents and make the current situation worse.
- A similar situation is considered to exist in relation to dental services, whilst there would be further pressure on pharmacy services.
- Local shops were considered to be inadequate to support further growth and an increase in population. More people would impact on the local shopping centre, as it would become busier, affecting existing residents.
- Public transport services are poor/limited, meaning residents would be more likely to use the car, contrary to the aim of reducing car use. Further development would also have a negative impact on public transport services due to increased number of users. Noted that there is no railway station within walking distance of the site.
- More vehicle movements would increase air pollution and affecting congestion.
- Concerns regarding the ability of the utilities networks to support additional housing, specifically in relation to power supply and what measures would be put in place to prevent loss of power to the area. Noted that a water main crosses the sites, with some concern that development would mean a risk of supply being interrupted.
- Suggested that instead of development in the area, further investment in infrastructure should take place, e.g. upgrading the local play area and provide more footpaths for walking.
- Concerns over the impact of recent Green Belt development off Allerton Lane on infrastructure provision, noting that it was not provided in advance.
- A water main is noted crossing the site.

5. Impact on the highway network:

- Wider highway network was considered to experience significant levels of traffic passing through it and congestion, particularly during peak periods/school start and finish time, resulting in delays to road users and affecting public transport services.
- Existing network is considered to be unsuitable to accommodate existing traffic levels. Particular issues with congestion and queuing are experienced at several points – Cottingley New Road, the junction of Cottingley Moor Road/Lysander Way, and around the primary and secondary schools.
- Issues occur with parking associated with the schools and on-street parking affects the network and its ability to perform as well as the safety of pedestrians.
- Area is noted as having a number of road traffic accidents due to levels of vehicles using the network and congestion, which would be increased by new housing. The area also suffers from "rat running". Development would result in an increase in that phenomenon, particular if there was any through access via any new development.
- The highway network was viewed as being unable to cope with or support any increase in housing development. 155 dwellings would lead to a significant increase in traffic levels and the number of vehicles using the network, adding to existing issues/concerns, making them worse.
- Would be increased congestion and delays as well as more pollution from vehicle emissions and traffic noise, which would impact on local residents.
- Increased vehicle emissions would be detrimental to health and wellbeing through reduced air quality and contrary to the Council's aim of reducing the area's carbon footprint as well as the principles behind the introduction of the Clean Air Zone.
- Suggested that before any further development is permitted in Cottingley, consideration should be given to examining how the road network could be improved to accommodate it to ensure that there is no detrimental impact on residents.
- A thorough traffic survey should be carried out to assess traffic density and the effect on the wellbeing/safety of pedestrians and residents.
- Monitoring of the number of cars should be undertaken at the local schools and that a pollution monitoring station should be built on/near school grounds.
- Access to the development should be permitted via an alternative route – either via Main Street or across the B6146 to Sandy Lane

6. Site access:

- March Cote Lane and the surrounding roads (Coppy Close, Rycroft Avenue) were considered to be unsuitable due to their width and the issues with on street parking, which affects existing traffic flows creating bottlenecks and causing potential hazards. They are also felt to be at capacity. Further development would exacerbate these issues.
- Were particular concerns that emergency and service vehicles would find difficult to access the proposed site due the issues with the immediate road network.

- The route from March Cote Lane feeds onto Manor Road, the only route to/from the centre of Cottingley to reach the main highway network. The junction of the Manor Road and Cottingley New Road was considered to experience congestion, particularly at peak times. Additional traffic from the proposed site would add to these issues, affecting local residents and vehicles travelling along Cottingley New Road as well as creating more pollution.
- Manor Road highlighted as having a number of problems, including speeding vehicles and ineffectual traffic calming measures. The later could be solved by full width traffic calming/speed bumps. Staybright Avenue also experience similar issues, which would be compounded by more development.
- Objection to any access to the site being taken from Lysander Way. Allowing additional traffic from any future development would alter the estate's character and impact on residents.
- Permission for the Lysander Way estate was granted on the understanding with local/national government that no additional traffic could go through Cottingley village. Also, it would contrary to principles set out in a 1985 Local Plan for the area, which states that using Lysander Way would not be feasible, and that March Cote Lane could not be used due to traffic safety concerns.
- Adding further traffic to Lysander Way would impact upon its junction with Cottingley Moor Road and have implications for road safety around the primary school. The estate has parking restrictions in place at school start and finish times to reduce congestion and traffic in the area

7. Impact on highway safety:

- Concern over potential impacts on highway safety.
- Has been a number of accidents/near misses in recent years. The existing highway network is also considered to be verging on being dangerous. Narrow roads are also an issue.
- Further development and the associated increase in traffic on the highway network in the area would impact on pedestrian safety, as additional hazards would be created and risks increased.
- Particular concerns expressed regarding the impact of the safety pupils making their way to/from the local schools. Should be given proper consideration. One impact would be the loss of traffic free route to/from the school.

8. Flood risk/drainage:

- Site and the wider Cottingley area highlighted as experiencing flooding on a regular basis, particularly during periods of heavy rain.
- Development would increase the risk of flooding and damage to properties in the surrounding area as well as further afield to areas downhill/downstream towards the River Aire.
- Particular concerns expressed in relation to surface water flooding. March Cote Lane area highlighted as having issues with flooding and drainage, which has affected properties and gardens as well as resulting on water flowing along the highway network as the drains/culverts are unable to cope.

- The drainage network was considered to be unsuitable to manage existing water flows and would not be able to support further development. It has not been upgrading in past twenty years.
- Proposals to address drainage and ground water flooding only referred to the proposed development (subject to a recent planning application) and not how it would address the issues affecting the existing estate. The use Sustainable Urban Drainage systems (SUDS) considered unsuitable for the site due to ground conditions and geology.
- The site provides natural flood attenuation, absorbing water and reducing flooding to the surrounding area. If developed, this would be lost, leading increased flooding in the surrounding area.
- Topography was also highlighted as contributing to the risk of flooding. Other concerns related to the ground stability of the site, as parts of it are prone to waterlogging.
- Cottingley Beck is liable to flood and had seen increased water levels in recent years. As such it could not cope with further large volumes of waters, which would impact on adjacent properties, retaining walls and gardens downstream via increased flood risk and erosion causing undercutting and damage.
- Proposals to pump water from the site into the Beck would exacerbate this problem and increase the number of properties at risk. Particular reference was made to impacts on the integrity of stone wall along the Beck. Assurances were sought regarding any liability or structure put in place to protect against the outcomes of the wall being damaged and causing danger.
- Suggested that the proposed site together with those on the western edge of Shipley should considered in a more joined up manner in relation to flood risk and drainage matters. Development on proposed site would have implications for this further downstream.
- Queried whether any flood risk assessments that had been undertaken and what measures would be put in place by developers to protect properties from flooding.

9. Impact on biodiversity/wildlife:

- Development would have a detrimental and significant impact on biodiversity and wildlife resulting in the loss of range of animals and birds together with habitats support them, nesting sites and feeding grounds.
- Site, and its surrounding area, considered to be an important for wildlife and is home to a range of animal and bird species (some of which are threatened/at risk) as well as native flora. Development would disrupt an important wildlife corridor, whilst pumping more water into Cottingley Beck would affect the wildlife present within it.
- Noted that Bats, Buzzards, Curlews, Deer, Fieldfairs, Foxes, Goldfinches, Hares, Hedgehogs, Kestrels, Lapwings, Nuthatches, Redwings, Skylarks and Woodpeckers were present on the site. These would be lost or be affected by disruption due to construction.
- Queried whether a wildlife habitat assessment had been undertaken. Loss of wildlife would contrary to the wished of local people.
- A number of trees and hedgerows, including a number of oak trees, would also be lost.

- If loss of, or harm to biodiversity resulting from development cannot be avoided, adequately mitigated or, as a last resort, compensated for, permission should be refused in line with the NPPF. Where, it results in the loss or deterioration of irreplaceable habitats, it should be refused, unless there are exceptional reasons and suitable compensation strategy exists.
- Suggested that the more trees should be planted on the site rather than it being developed.

10. Loss of open space/green space and impact on health/wellbeing:

- Development would result in the loss of open and green spaces that are important for the local population, and its physical and mental health/wellbeing.
- Existing footpaths across the site are used by many people for walking and enjoyment of the countryside as well as the views provided from the upper sections.
- Would reduce opportunities for recreation and have a negative impact on health/wellbeing.
- Concerns that the community would not benefit from development.

11. Impact on character and amenity:

- Issues raised relate to the impact of development on the amenity of the surrounding area, adjacent properties, quality of life of residents and the character of Cottingley.
- Potential for impacts arising from noise pollution and emissions during construction and occupation of the new dwellings.
- Would be a loss of open views across the countryside from neighbouring properties as well as a reduction in property values and potential for an increase in crime levels.
- Would be a negative impact on the character of Cottingley including its historic nature and the community as a whole. It character would be changed as a result of development include a loss of community identify as well as removing many of the factors that existing residents enjoy about living in the area and that attract people to move to it.

12. Design of new housing:

- Should development occur, it was suggested that a requirement is place on all new housing to be design and constructed to a “Passivhaus” standard.
- Noted that previous housing development, built nearby, was not of a suitable standard, something that would not be wanted for the site.

13. Loss of agricultural land:

- Development would result in the loss and reduction of agricultural land that is currently used for animal grazing.
- Land should be retained in its current use in order to continue to provide opportunities for grazing and crop growing, which help to provide locally sources food. Would help to avoid the need to import and transport food from elsewhere.

14. Impact on the wider environment and climate change:

- Development would have an impact on the wider environment and contribute towards climate change.
- Air pollution levels would be increased due to more traffic on the local highway network, with concerns that it would spill over into the Clean Air Zone (CAZ).
- Queried why the CAZ had been introduced but developments that would have a lasting impact on health of residents in Bingley and Cottingley were being proposed.
- Urban sprawl would contribute to climate change.
- Development would conflict with the aim of good environmental stewardship.
- Insufficient work/employment opportunities in the area to support further growth.

15. Consistency with policy:

- Development would be contrary to the provisions of the NPPF and not compliant with the Council's policy aim of a zero carbon future. New homes and more cars will increase carbon levels.
- Proposed housing density on Green Belt site allocations considered to be much lower than that expected/required under Local Plan Policy HO2.
- Not accepted that the proposed level of greenfield allocations was necessary to meet the requirements set out in the Local Plan. Suggested that densities are increase and the size of the Green Belt/greenfield allocations reduced.

16. Pending planning application:

- Site is the subject of pending outline planning application, that had already raised a high level of concerns amongst local residents.
- The large quantity of objections submitted in relation to the application were not taken into account as part of the site selection/Local Plan process.
- Applications for development on the site had been refused three occasions as well as dismissed on appeal, for a variety of reasons. It was queried, therefore, why it could be included within the Local Plan.

17. Impact on designated heritage assets:

- Site falls within an area identified by the Saltaire World Heritage Site (WHS) Management Plan as being as being important to its setting and where tall buildings could also affect its setting.
- Several Grade II Listed Buildings located in close proximity to the site – Cottingley Town Hall and Community Centre, Stock-A-Close Farmhouse and Barn.
- Concerns that increased water flows in Cottingley Beck resulting from development would undermine the Town Hall/Community Centre's foundations rendering it unusable.

- Before allocation an assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the designated heritage asset and the impact that development would have.

Support:

1. **Proposed site allocation:**
   - Proposed allocation supported. Would deliver the requirements of the Local Area Strategy for Cottingley.
   - Site felt to be deliverable, with no known viability issues and no environmental constraints that could not be addressed via appropriate design.
   - Will deliver the housing requirement, support the vitality/viability of the local centre, protect/enhance open spaces and green areas, and maintain the Green Belt between Cottingley, Shipley and Bradford.

Comments:

1. **Flood risk/drainage:**
   - Cottingley highlighted as experiencing flood risk issues, which development of the site would exacerbate. It would also get worse due to climate change.
   - Concern expressed relating to the drainage network and surface water flooding in the area, including the proposed site. Expanding culverts would give rise to “riparian ownership” implications for residents.
   - The site located in Flood Zone 1 (FZ1).
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates.
2. **Loss of agricultural land:**
   - Noted that the site may be located on best and most versatile (BMV) agricultural land, which should be safeguarded in line with national policy.
   - Recommended that an Agricultural Land Classification (ALC) survey is undertaken to determine its ALC Grade and inform future master planning and soil handling.
   - Survey would also help to inform the Sustainability Appraisal and assess the impact of the plan on soil resources.
3. **Impact on local infrastructure/services:**
   - Concerns over the ability of local infrastructure (schools and GPs) to support further growth. Both considered to be at capacity.
4. **Impact on the highway network:**
   - Access to the site from the surrounding road network raised as a concern as it was not considered to be suitable or feasible to accommodate more traffic.

• Improvements not proposed or possible within the wider area, e.g. widening of Cottingley Moor Road/Lee Lane or inability to improve the road through Sandy Lane village.
5. Existing planning permission: • Plan does not take into consideration, the planning permission granted at Sun Inn for 18 dwellings.

Representation IDs: 57, 87, 91, 133, 160, 577, 648, 679, 690, 694, 827, 829, 862, 872, 887, 893, 903, 912, 913, 924, 943, 962, 967, 1007, 1048, 1215, 1334, 1370, 1451, 1533, 1611, 1623, 1651, 1714, 1720, 1729, 1891, 2077, 2080, 2093, 2131, 2163, 2180, 2258, 2330, 2367, 2514, 2526, 2649, 2735, 2817, 2853, 3130, 3244, 3311, 3553, 3565, 3784, 3902, 4050, 4088, 4150, 4169, 4282, 4439, 4442, 4448, 4504, 4611, 4614, 4675, 4698, 4706, 4745, 4757, 4761, 4791, 4800, 4891, 4933, 4952, 5047, 5125, 5130, 5169, 5194, 5338, 5362, 5474, 5604, 5655, 5706, 5774, 5911, 5930, 6027, 6049, 6052, 6087, 7533, 7919, 8010, 8016, 8453, 8635, 9402, 9700, 10110, 11253, 11929, 12096, 12138, 16979, 16980, 19721, 19909, 20700, 21659, 23575, 24155, 25510, 27473, 27649, 28124, 28357, 28597, 28756, 28821, 28991, 29390, 30228

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 103 within the consultation document.

Summary of Consultation

A total of **36** representations were received in relation to Question 103 from **36** respondents. Respondents included Highways England, local residents and a Ward Councillor. (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.6**.

Table 0.5: Consultation Question 103: Cottingley Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q103	36	36	33	1	2
Total	**36**	**36**	**33**	**1**	**2**

Table 0.6: Consultation Question 103: Cottingley Preferred Site Allocations - Summary of Representations Received

Consultation Question 103 – Cottingley Preferred Site Allocations

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q103	36	36	33	1	2

Headline Summary:	Council Response:
Representations focused upon the following key issues: • Development in the Green Belt • Location of development • Impact on the highway network • Impact on local infrastructure/services • Flood risk/drainage • Impact on biodiversity/wildlife • Consistency with policy • Impact on health and wellbeing • Pollution • Exclusion of site - Land at Hazel Beck (SHLAA Ref: CO/006) • Exclusion of site - Land at Cottingley Cliffe Road (SHLAA Ref: CO/011) • Support Principle of development • Overall level of development	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

Summary of Representations
Objections
1. Development in the Green Belt: • Objection to development in the Green Belt. It was designated for a reason and should remain protected and not built upon. • Would protect wildlife as well as Cottingley's unique rural setting and maintain the quality of life local residents. • Exceptional circumstances for its release questioned. Suggested that there were many empty homes in Bradford that could be made use of. • Reference made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed.
2. Location of development: • Queried why the Plan was seeking to allocate Green Belt land when there were brownfield and/or derelict sites and buildings including in Bradford and Shipley that could accommodate further housing growth instead. • Would ensure that Green Belt is protected • Such sites and buildings could benefit from recovery and regeneration.
3. Impact on the highway network: • The highway network in Cottingley and in the immediate vicinity of the proposed site, highlighted as being busy and already suffering from congestion (particularly at peak times) as well as issues related to road safety. • Existing highway issues and proposed developments in a number of locations nearby (Nab Wood, Heaton, Shipley) had not been taken into account in preparing the plan. Development in these areas would have a severe effect on Cottingley. • Existing traffic levels considered to be too high. Particular issues with congestion are experienced on Cottingley Moor Road around the primary school at drop off/pick up times due to lack of parking. This has also resulted in problems with the safety of children travel to/from the school on foot or in vehicles. • Development of the proposing site, as well as that proposed in surrounding area would increase the level of traffic flows in Cottingley, placing further pressure on the highway network, particularly at peak times, leading to more congestion as well as more air pollution and more accidents. • Suggested that further work will be required to the road network to cope with development. Other concerns were expressed that the roundabouts on Cottingley Cliffe Road would become more dangerous.

- The roads surrounding the site are narrow and have significant levels of on-street parking, limiting vehicle movement and visibility. Would not cope with increased traffic, both during construction and when the new dwellings are occupied. Road safety would also be reduced.

4. Impact on local infrastructure/services:

- Concern raised regarding the capacity of local infrastructure/services and its ability to accommodate/support further development.
- Infrastructure in Cottingley was considered to insufficient. Development would place additional pressures/burdens upon it, exacerbating existing problems. Recent development in the area had had a significant impact.
- Concerns expressed regarding the capacity of the local school and GP/NHS services, and the impacts that any additional population would bring.
- School is full/over-subscribed with a shortage of places. Would be difficult children of new and existing residents to obtain places, resulting in the travelling elsewhere.
- Difficulties are experienced in accessing and registering for GP/NHS service. Further development would create more pressures. Reference made to the ongoing and potential future construction of retirement flats in Bingley and their potential impact on health services.
- Lack of bus services and shopping facilities were also raised.

5. Flood risk/drainage:

- Flood risk and the suitability of the drainage infrastructure was a key issue affecting the proposed site (CO1/H) and the Cottingley area more generally. Grange Park was highlighted as an area that has flooding problems.
- The site, whilst experiencing flooding acts as a natural drain/sponge to absorb water arising from run-off from the surrounding area as well as during times of rain. However, neighbouring properties had experienced flooding due to run-off. Development would result in increased risk of flooding to these properties as well as the surrounding area resulting in damage.
- Drainage network was considered to be insufficient and unable to cope with existing water levels. An existing culver under March Cote Lane was noted as being unable to carry more water, causing flooding to the highway and hazardous driving conditions.
- Development would increase demands on the drainage network and make the existing situation worse.
- Cottingley Beck and two un-named water courses are located within the vicinity of the proposed site as well as the secondary school. The un-named watercourses are identified as source flooding at their meeting point due the way the course is defined. Water has been finding a new courses/lines o flow the area onto the school and highway network. Cottingley Beck highlighted as struggling to cope with existing water levels.

6. Impact on biodiversity/wildlife:

- Site is home to a range of wildlife including animals and birds, some of which are endangered/threatened, as well as plants.

- Curlew, Deer, Lapwings and Skylarks noted as being present within the site.
- Development would result in the loss of wildlife and habitats that supports it.

7. Consistency with policy:

- Placing large number of new dwellings on a small area of land would be contrary to the Council's priority of having a green environment that promotes clean air.

8. Impact on health and wellbeing:

- Concerns regarding the impact of development on the health and wellbeing of residents.

9. Pollution:

- Concerns regarding potential for increased levels of pollution resulting from development, in particular air and noise pollution, including during construction.

10. Exclusion of sites:

- **Land at Hazel Beck (SHLAA Ref: CO/006):**
  - Considered an appropriate site for sympathetic development with ecological mitigation possible.
  - Makes a weaker contribution to the five Green Belt purposes compared with proposed site allocation CO1/H, having a moderate impact. As such should be sequential preferable in respect of the Green Belt.
  - Should be allocated alongside proposed site CO1/H to provide additional sites to meet the District's housing needs.
  - Considered appropriate and deliverable.
- **Land at Cottingley Cliffe Road (SHLAA Ref: CO/011):**
  - Site considered to be suitable, deliverable and achievable.
  - Reason for rejection – not being attached/adjacent to the built up – was incorrect. It adjoins Cottingley Primary School
  - More logical settlement boundary would include the school and its grounds, removing the reason for rejection.
  - Technical information prepared to support the site demonstrates that it is available, achievable and suitable, representing a deliverable site.
  - Scores similarly to the proposed site allocation CO1/H in the SA.
  - Should be the only allocation in Cottingley replacing proposed site CO1/H or allocated as safeguarded land, forming a reserve site to address issues of non-delivery/under-delivery, maintain a five year land supply and to meet the 35% uplift to the standard method.

Support

1. Principle of development: • Support for development in the Cottingley area. • People should be able to afford to live close to family. Younger, working people should not have to move elsewhere. • Concern that the settlement would become home solely older people. • Attracting working professionals would contribute to economic growth.
Comments
1. Impact on the highway network: • Development in Cottingley would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
2. Overall level of development: • Plan does not take into consideration the planning permission for 18 dwellings granted on the site of the Sun Inn Public House.

Representation IDs: 24, 469, 806 ,811, 814, 815, 866, 882, 889, 911, 925, 947, 1037, 1445, 1572, 2126, 2399, 2442, 2461, 2594, 3285, 3349, 3851, 3887, 4146, 4296, 4585, 4823, 4861, 5132, 5708, 5716, 15492, 17176, 28978, 29697, 29698

2.80 EAST MORTON

Introduction

The Local Plan settlement hierarchy identifies East Morton as a Local Service Centre. This means the emphasis is on a smaller scale of development comprising both market and affordable housing, together with the protection and enhancement of those centres as attractive and vibrant places and communities, providing quality of place and excellent environmental, economic and social conditions. Based on this it is proposed that the settlement has a housing target of 10 dwellings. A single site allocation for residential use is proposed to deliver this development requirement.

Portrait & Local Area Strategy

The Local Plan provides a portrait of the East Morton's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities, protecting/enhancing open spaces, green areas, networks and corridors as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as question 104 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **13** representations were received in relation to the East Morton portrait and Local Area Strategy (Question 114) from **11** respondents. Respondents included local residents, Highways England, a landowner and a Member of Parliament. **Table 0.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.2**.

Table 0.1: Consultation Question 104: East Morton Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
104	East Morton Portrait & Local Area Strategy	13	11	11	0	2
	Totals	**13**	**11**	**11**	**0**	**2**

Table 0.2: Consultation Question 104: East Morton Portrait & Local Area Strategy - Summary of Representations Received

Consultation Question 104 - East Morton Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
104	East Morton Portrait & Local Area Strategy	13	11	11	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Proposed site EM1/H • Impact on local infrastructure/services • Flood risk/drainage • Loss of open space • Impact on the highway network • Proposed level of growth • East Morton portrait	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy EM1: East Morton, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

Summary of Representations

Objections

1. **Development on Green Belt land:**
   - Would be contrary to Government's aims and objectives, and should be not be considered at all.
   - The use of suitable brownfield sites should be maximised, in line with the NPPF, before considering changes to Green Belt boundaries. It was viewed that Bradford had a plentiful supply of brownfield that had not been developed.
   - Use of brownfield land to infill with smaller development should be priority for the Council.
   - Plan lacks information about which brownfield sites had been considered – this should be provided, together with details of the exceptional circumstances precluding their use.
   - Use of brownfield sites would help to protect wildlife habitats and the environment. Such sites could be tidied up with less environmental damage.

Summary of Representations
• Insufficient justification was provided to demonstrate that exceptional circumstances existed for development in the Green Belt. It was viewed that such circumstances did not exist. All other reasonable options should to meet housing needs should be considered. • There was also no justification for the proposed housing numbers to warrant the removal of areas of Green Belt. • Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed.
2. Proposed site EM1/H: • Would extend the village's perimeter and change its character. • Residents live in East Morton to enjoy the countryside and should be consulted before decision making process goes any further.
3. Impact on local infrastructure/services: • Concerns over the ability of the area's infrastructure to support further development and the impacts that it will have. • Available school places are limited as are GP appointments. Primary school has been extended several times, whilst GP services can only be accessed by car. • Inadequate proposals had been presented in the Plan in relation upgrading local infrastructure support proposed housing and extra pressures on services. • No clear vision to increase passenger capacity on local public transport – contrary to Government Decarbonising Transport strategy priority of making public transport and active travel a first choice. • Plan encourages greater car use.
4. Flood risk/drainage: • Flooding causes issues in the surrounding area include with waste water drainage.
5. Loss of open space: • Would result in the loss of green space.
6. Impact on the highway network: • Would be increased traffic using the current route via the canal bridges to access the area.
7. Proposed level of growth: • Objection to proposed levels of growth in East Morton and the surrounding area – around 200 dwellings

Summary of Representations
• No evidence/justification produced stipulating that East Morton and Riddlesden's housing need warrants releasing land for up to 198 dwellings. • No justification or evidence provided for the proposed level of growth to warrant the release of land, including from the Green Belt, for it. • Proposed strategy considered be satisfactory, with no specific issues with the Street Lane site, however wider strategy considered to unsound • Overall District housing requirement and its spatial distribution was considered to fail to deliver the wider settlement strategy. It would not deliver the housing required nor upgrades to open space. • Suggested that revised level of housing growth – 100 dwellings – should be included in the Plan for East Morton. Would the reflect the adopted Core Strategy requirement. • SHLAA site EM/012 proposed for inclusion in the Plan to support an increased level of housing growth. • People live in the East Morton to enjoy the countryside. Residents should be consulted before the decision making process goes any further
Support
No representations received in support.
Comments
1. Impact on highway network: • Development in East Morton would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
2. East Morton portrait: • Village's role in the settlement hierarchy was consistent with the ambition to provide high quality residential development and improved facilities at the Golf Club. • Concern that plan links Green Belt to natural landscape and village landscape – conflating a number of issues • Green Belt viewed as a containment tool and should be considered as a separate topic. • Level of open space provision was noted, however the Plan should clearly distinguish between public and private spaces.

Representation IDs: 470, 1112, 1122, 1133, 1213, 1548, 6427, 6464, 9629, 15493, 27977, 27978, 27979, 28258

Sites

1.1 As highlighted above, five sites were put forward in the Preferred Options document to meet the proposed development requirements for East Morton (1 for residential). Under Q106 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

1.2 A total of **13** representations were received in relation to site EM1/H from **13** respondents. Respondents included local residents, Highways England, a landowner and a Member of Parliament. **Table 0.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.4**.

Table 0.3: East Morton Proposed Site (EM1/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
EM1/H: Street Lane	13	13	9	1	3
Totals	**13**	**13**	**9**	**4**	**3**

Table 0.4: East Morton Proposed Site (EM1/H) - Summary of Representations Received

EM1/H: Street Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
EM1/H: Street Lane	13	13	9	1	3

Headline Summary	Council's Response
Representations focused upon the following key issues: • Development on Green Belt land • Impact on the environment • Impact on local infrastructure/services • Impact on local highway network • Site location • Proposed overall level of growth • Housing mix • Impact on designated heritage asset • Support for the proposed site allocation • Site Access • Proximity to South Pennine Moors SPA • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H306 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Development on Green Belt land: • Objection to the development of Green Belt land

- Exceptional circumstances to allocated the land not demonstrated or properly justified.
- All other reasonable options should be considered e.g. increasing the proportionate of development directed towards urban brownfield sites or further increases in densities to reduce the requirement of greenfield/Green Belt site.
- Would be contrary to Government's aims and objectives as well as local policies on Green Belt and Zero Carbon Futures.
- Use of brownfield land should be maximised before releasing Green Belt land. Considered that there were sufficient brownfield sites within abandoned buildings/warehousing that could be used, whilst there a large number of empty dwellings that should be brought back into use.
- Plan gives insufficient weight to the potential loss of Green Belt. Impact assessment does not recognise the relations with the surrounding area.
- Considered to be little advantage to building on the site, but there were many disadvantages to destroying a greenfield site.

2. Impact on the environment:

- Development impact on the landscape and spoil the view of the village within the landscape.
- Would result in damage to/loss of wildlife and green habitats, loss of natural views and increased pollution, as well as sprawl.

3. **Impact on local infrastructure/services:**

- Infrastructure had not been taken into account in drawing up the Local Plan, with inadequate proposals being presented in relation to upgraded local infrastructure to support additional growth and pressure on services
- Plan lacks a clear vision for increasing passenger capacity on public transport, contrary to the Government's Decarbonising Transport strategic priority.

4. Impact on local highway network:

- Street Lane highlighted as being narrow with limited opportunities for vehicles to pass one another. As such it cannot cope with more vehicles using it.
- Considered dangerous for pedestrians – more vehicles would compound the issue. Road is a popular walking route to reach the moors.
- Narrow nature of the road not reflect in the impact assessment used to determine the site's suitability.

5. Site location:

- Site separated from the built up area of East Morton and not close to any neighbouring properties.
- Development would create the possibility of further urban sprawl,
- Site could accommodate more than seven dwellings.

6. Proposed level of growth:

- No justification or evidence provided for the proposed level of growth to warrant the release of land, including from the Green Belt, for it.
- Suggested that seven dwellings could be provided via smaller single site plots or infill opportunities that may arise.

7. Housing mix:

- Presumed that the housing would not be affordable.
- Should be a stipulation placed on the site that new dwellings should either be affordable housing or experimental eco-housing. Would add to the variety of housing in the village.
- Queried the proportion that would be social housing

8. **Impact on designated heritage asset:**

- Site located within close proximity to three Scheduled Monuments (Pre-Historic Cup, Ring and Groove Marked rock carvings).
- An assessment should be undertaken (before allocation) of the site's contribution towards those elements that contribute towards the designated heritage asset's significance and the impact that development would have.

Support:

1. Proposed site allocation:

- Site allocation was supported.
- Considered to be available, suitable and achievable, and therefore deliverable in the short term.

Comments:

1. Overall level of growth:

- Objective of development in the village supported including the proposed site.
- Would be good if housing was affordable or publically rented accommodation, and designed to "Passiv" house standards.

2. Site Access:

- Concern regarding access from Street Lane – a narrow lane with blind bends
- Increased traffic would cause difficulties unless it is widened.
- Flooding on the road a potential issue.

3. Proximity to South Pennine Moors SPA:

• Site is in close proximity to the South Pennine Moors (Phase 2) SPA and had potential to lead to the loss of functionally linked for SPA birds. • Recommended that the site is screened via the model for identifying suitable sites for SPA Golden Plovers. • Where the loss of functionally linked land cannot be ruled out, it was recommended that allocation requirement text in the plan sets out survey and mitigation requirements clear.
4. Flood risk/drainage: • Site is located within Flood Zone 1 (FZ1) • Further guidance provided on flood risk mitigation measures and surface water discharge rates.

Representation IDs: 1363, 2198,2232, 4802, 5487, 7153, 8633, 16258, 19884, 28257, 28777, 29391, 29517

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 115 within the consultation document.

Summary of Consultation

A total of **8** representations were received in relation to Question 105 from **6** respondents. Respondents included Highways England, local residents and several landowners/agents. **Table 0.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.6**.

Table 0.5: Consultation Question 105: East Morton Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q105	8	6	7	0	1

Table 0.6: Consultation Question 105: East Morton Preferred Site Allocations - Summary of Representations Received

Consultation Question 105 – East Morton Preferred Site Allocations	
Headline Summary	**Council's Response**
Representations focused upon the following key issues: • Development of Green Belt land • Impact on local infrastructure • Flood risk/drainage • Loss of open space • Impact on highway network • Alternative site - EM/004: Street Lane • Alternative site - EM/005: Land at Cliffe Delph • Alternative site - EM/012: Land west of Morton Lane	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

Summary of Representations
Objections
1. Development of Green Belt land: • Object to the development of Green Belt. • Considered that Bradford has a plentiful supply of brownfield site that have not been developed. • Reference made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. • Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed.
2. Impact on local infrastructure: • Concern over the impact of development local infrastructure/services • Limited school places and GP appointments available.
3. Flood risk/drainage: • Flooding causes issues in the surrounding area include with waste water drainage.
4. Loss of open space: • Would result in the loss of green space.
5. Impact on highway network: • Would be increased traffic using the current route via the canal bridges to access the area.
6. **Alternative sites**: • Objection to the non-inclusion of three sites – SHLAA references EM/004, EM/007 and EM/012. Proposed as alternative or additional sites to the preferred site (EM1/H). • **EM/004: Street Lane**: • Considered to be available and would assist in meeting a higher housing requirement for the District. • Classed as an alternative in the SA • Appropriate access design drawn up to show that access is achievable and would not prevent delivery

- Development would design with the setting of the Conservation Area as a primary consideration.

- **EM/005: Land at Cliffe Delph**:
  - Should be reconsidered as being preferable to, or in addition to, site EM1/H
  - Would bring a wider range of benefits and be capable of making a meaningful contribution to provision of market and affordable housing as well as meeting the higher component of housing need that should be distributed to East Morton.
  - Site description in the Green Belt review and SA was incorrect as it included a wider area than proposed.
  - Suggested that assessment of purpose 4 should be removed from the Green Belt Assessment and the SA undertake again,
- **EM/012: Land west of Morton Lane**:
  - Three configurations put forward, each of varying extent and level of housing provision (EM/012A: Land to rear of St Luke's Terrace [0.95ha; 30 dwellings; EM/012B: Paddocks and Works, West of Morton Lane [3.36ha; 75 dwellings]; EM/012C: Nursery Farm and Land west of Morton Lane [5.15ha; 100 dwellings).

Support

No representations received in support.

Comments

1. **Impact on the highway network**:
   - Development in East Morton would not on its own have a severe impact on the Strategic Road Network.
   - It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

Representation IDs: 471, 1113, 7473, 11822, 15494, 27980, 27981, 27982

2.81 KEIGHLEY

Introduction

The Local Plan settlement hierarchy identifies Keighley as one of Bradford district's three Principal Towns. This means that it will be a main local focus, outside of the Regional City of Bradford, for growth in terms of housing, employment, shopping, leisure, education, health and cultural activities and facilities. There is a key focus on transforming its economic, environmental, physical and social conditions to support its long term regeneration. Keighley is also identified by the Local Enterprise Partnership's as a Spatial Priority Areas for investment to support growth (housing or commercial) and regeneration via public sector investment. It is also one the towns selected to receive support from the Government's £3.6 billion Towns Fund, from which £33 million has been secured.

Based in this, it is proposed that the settlement has a housing target of 2,200 dwellings, consisting of sites that benefit from planning permission, where construction has yet to commence, or those that are currently under construction and will be delivered within the Local Plan period, and new site allocations, as well as an Area of Search for around 250 dwellings focussed on the Town Centre and Railway Station areas. 4.1ha of new employment land has also been proposed.

Portrait & Local Area Strategy

The Local Plan provides a portrait of the Keighley's key characteristics, and for the purposes of supporting community/neighbourhood approach to the future development strategy, sets out a series of Local Area Strategies for different sub-areas of the town:

- **Keighley Central & Business Development Zones** – covering the town centre as well as the mixed use neighbourhoods of Showfield and Lawkholme together with the established employment areas and Business Development Zones at Royd Ings and Dalton Lane/Worth Village.

- **Riddlesden & Stockbridge** – covering the largely residential neighbourhoods of Riddlesden and Stockbridge which straddle the River Aire.

- **Keighley North West** – covering the residential neighbourhoods to the between North Beck and the Leeds/Bradford to Skipton railway line including Braithwaite, Guard House, Highfield and Utley.

- **Keighley South East** – covering the largely residential neighbourhoods to the east of the River Worth and south of Park Wood, of Hainworth Wood, Hermit Hole, Ingrow (part of) Long Lee, Spring Bank, Thawaites & Thwaites Brow and Woodhouse.

- **Keighley South West** – covering the largely residential and mixed use neighbourhoods to the south west of town and between the River Worth and North Beck, including Bogthorn, Bracken Bank, Damems, Exley Head, Holy Croft, Ingrow (part) and Knowle Park.

These were listed as questions 106 to 110 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategies can be viewed on the Council's website.

Summary of Consultation

A total of **59** representations were received in relation to the Keighley portrait and Local Area Strategies for its sub-areas (Questions 106 to 110) from **57** respondents. Respondents included Highways England, Historic England, landowners/developments (and their agents), a local cycling group, local residents, a Member of Parliament and Ward Councillors. It should be noted that many of same respondents put forward representations on multiple questions. **Table 0.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.2**.

Table 0.1: Consultations Questions 106 to 110: Keighley Portrait & Sub-Areas Local Area Strategies – Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
106	Local Area Strategy – Keighley Central and Business Development Zones	7	7	3	2	2
107	Local Area Strategy – Riddlesden & Stockbridge	19	17	15	1	3
108	Local Area Strategy – Keighley North West	5	5	1	1	3
109	Local Area Strategy – Keighley South East	19	19	14	3	2
110	Local Area Strategy – Keighley South West	9	9	6	1	2
	Totals	**59**	**57**	**39**	**8**	**12**

Table 0.2: Keighley Portrait & Sub-Area Local Area Strategies - Summary of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
106	Local Area Strategy – Keighley Central and Business Development Zones	7	7	3	2	2

Consultation Question 106 - Keighley Central and Business Development Zones Local Area Strategy

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Provision of walking/cycling infrastructure • Development on Green Belt/greenfield land • Impact on climate change/environmental emergency • Impact on local infrastructure/services • Provision of affordable housing • Impact of proposed waste to energy plant • Keighley Town Centre: • Local Area Strategy was broadly supported • Conservation and enhancements to key designated heritage assets and their setting was welcomed • Impact on the highway network • Alternative site - Rejected SHLAA site KY/105	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy KY1: Keighley, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections

Summary of Representations
1. Provision of walking/cycling infrastructure: • Local Area Strategy lacked specific proposals for new walking/cycling infrastructure beyond supporting opportunities to improve connectivity to/from the railway station and employment areas. • Plan should include a positive commitment towards improvements rather than aspirations, via stronger wording. • Airedale Greenway is not well linked to the town centre. On-road cycle lanes did not exist in a meaningful sense and need to be addressed urgently. • No reference to cycling/walking in other Keighley Local Area Strategies.
2. Development on Green Belt/greenfield land • Object to development on Green belt land – contrary to Government policy. • Boundaries can only be change in exceptional circumstances and inappropriate development approved only in very special circumstances. Queried what the circumstances were for releasing Green Belt sites. • Area has enough brownfield (or potential brownfields) sites including abandoned buildings, unused warehousing and industrial land. Suggested that unoccupied properties should be considered and/or compulsory purchased.
3. Impact on climate change/environmental emergency: • Planet is considered to face several crises – biodiversity/ecosystem collapse, climate chaos, flooding, global health crisis). • Plan would smother Green Belt areas, nature reserves and agricultural land. Would not be part of the solution.
4. Impact on local infrastructure/services: • Infrastructure (roads, doctors, schools, sewage, traffic etc.) is never considered when preparing the Local Plan.
5. Provision of affordable housing: • Queried whether any social housing will be built as part of new developments.
6. Impact of proposed waste to energy plant: • Not considered to provide any benefit to the community. • Site would have more appropriate for housing – a community benefit.
Support
1. Keighley Town Centre:

Summary of Representations
• Local Area Strategy was broadly supported • Considered that the town centre required investment and improvement. Reference was made to the number of closed shops, lack of amenities and lack of free parking. Greater consider needed in relation to the type/variety of retail. • Suggested that rents should be lowered to attract businesses and one-hour free parking introduced. Crime/anti-social behaviour around the bus station needs to be addressed.
2. Impact on designated heritage assets: • References to ensuring development conserves and enhances key heritage assets and their setting was welcomed.
Comments
1. Impact on the highway network: • Development in Keighley would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
2. Additional/Alternative site: • Rejected SHLAA site KY/105 should be included within the Plan – it is considered to be highly sustainable, suitable and immediately available. • Will help to address the planned distribution of housing and demonstrate a robust housing supply to meet the District's target. • Will provide a range of housing types/sizes to meet identified local needs as part a sound and planned approach.

Representation IDs: 364, 5523, 7203, 15495, 28362, 29102, 30124

Consultation Question 107 - Stockbridge & Riddlesden Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
107	Local Area Strategy – Riddlesden & Stockbridge	19	17	15	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Level of housing growth • Impact on the highway network • Impact on local infrastructure/services • Flood risk/drainage and ground conditions • Impact on biodiversity/wildlife • Impact on designated heritage assets • Impact on amenity • Loss of green spaces • Environment protection • Impact of proposed incinerator • Settlement boundary • Settlement coalescence between Riddlesden & East Morton • Additional/Alternative Site - SHLAA site KY/039: Banks Lane	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy KY1: Keighley, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections

Summary of Representations
1. Development on Green Belt land: • Objection to the use of Green Belt/greenfield land to deliver the proposed housing requirement. It should not be considered for development or including within the Plan, particularly at the expense of areas of brownfield land. • Development on protected is a line that should not be crossed. • Would diminish the “green lungs” of the Aire Valley. • Suggested that Green Belt land should be preserved for recreational, wildlife and aesthetic purposes. • Would be contrary to Government aims, objectives and policies and only used in exceptional circumstances. • No exceptional circumstances to justify releasing land for the Green Belt, and the strategic case for doing so had not been demonstrated. • Should maximise the use of sustainable brownfield sites before considering changes to Green Belt boundaries. All alternative options should be examined/considered to meet housing needs. • Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed and sites deleted from the plan. • Brownfield land should be used. Bradford District viewed as having plentiful supply of sites that had not been developed. Accessible. • Should be used as infill plot for smaller scale development
2. Level of housing growth: • Objection to the overall level of housing proposed in Riddlesden, Stockbridge and East Morton areas (around 200 dwellings). • No evidence stipulating Riddlesden/East Morton housing need warranting the release of land for 198 dwellings, or justification for them that requires the release of Green Belt land. • Area considered to be over-developed. • Consideration should be given to building a new town instead of developing in/around existing towns and villages.
3. Impact on the highway network: • The Carr Bank area has difficult/poor access, whilst development would result in increased traffic, particularly in East Morton, and more congestion. • Considered that development in the area would need large scale, expensive road infrastructure to delivery it.

Summary of Representations
• It was questioned whether new roads would be built, the existing canal bridge widened/strengthen and estate roads widened with pavements being reduced in width. • It was queried how issues experienced by vehicles turning onto the Bradford Road from Granby Street and parking problems would be addressed and whether roads could accommodate HGVs.
4. Impact on local infrastructure/services: • Development would place increased pressures on local amenities and services.
5. Flood risk/drainage and ground conditions: • Carr Bank area has experienced flooding, affecting the adjacent residential areas, leading to issues with the drainage network. As such, it is considered unsuitable for development. • A number of former mine works are present in the area.
6. Impact on biodiversity/wildlife: • Development would result in the loss of wildlife habitats, trees and meadow areas. • The area forms part of key habitats and feeding grounds for birds and animals. • Any loss would not be in keeping with the aim of protecting habitats.
7. Impact on designated heritage assets: • Concerns expressed regarding the impact of the Carr Bank/Carr Lane proposals on the character and conservation/heritage status of East Morton.
8. Impact on amenity: • Development would increase pollution from a range of sources including noise, impact on the surrounding community.
9. Loss of green spaces: • Objection to the loss of green spaces. • Suggested that more green space was needed rather than less, in particular to mitigate flooding issues.
10. Environment protection: • Greater consideration should be given to protecting the environment and making better use of resources, as well as addressing carbon emissions and global warming.
11. Impact of proposed incinerator:

Summary of Representations
• Concerns over the potential impacts of the incinerator at Keighley on the surrounding area.
12. Settlement boundary: • Carr Bank area should be classed as being part of East Morton rather than the wider Keighley Town/Riddlesden and Stockbridge area for the purposes of the Local Plan.
Support
1. Impact on designated heritage assets: • References to ensuring development conserves and enhances key heritage assets and their setting was welcomed.
Comments
1. Settlement boundaries: • Waterside Fold area and proposed site KY15/H marked as being part of Keighley rather than East Morton, causing confusion. Residents consider themselves as living in East Morton. • Concerns over impact on school boundaries/catchment areas.
2. Settlement coalescence between Riddlesden & East Morton: • Developing the proposed Carr Bank site would result in Riddlesden and East Morton merging • No green boundary between Waterside Fold and Hospital Road with no vehicular link between them • Would lead to loss of distinctive characters and boundaries of these areas.
3. Impact on highway network: • Development in Keighley would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan. • Swine Lane considered to unsuitable to accommodate more traffic.
4. Alternative/Additional Site: • One additional/alternative site put forward for consideration – SHLAA site KY/039: Banks Lane (a rejected site). It is considered to be immediately deliverable.

Representation IDs: 474, 618, 1040, 1114, 1132, 1344, 1355, 5873, 6429, 6462, 6695, 7206, 9630, 10778, 15496, 28255, 28553, 29103, 30130

Consultation Question 108 - Keighley North West Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
108	Local Area Strategy – Keighley North West	5	5	1	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on designated heritage assets • Lack of green/open space provision • Flood risk/drainage • Impact on local infrastructure/services • Impact on the highway network	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy KY1: Keighley, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections

1. Development on Green Belt land:

- Objection to the development of Green Belt land.
- District has a plentiful supply of brownfield sites that had yet to be developed.
- Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed and sites deleted from the plan.

Support

1. Impact on designated heritage assets:

• References to ensuring development conserves and enhances key heritage assets and their setting was welcomed.
Comments
1. Lack of green/open space provision: • Area has no parks and limited open space. Imbalance should be addressed via the Local Plan.
2. Flood risk/drainage: • Recent developments (Former Bronte School & Occupation Lane) in the Oakworth Road area had caused significant drainage issues.
3. Impact on local infrastructure/services: • Area is not equipped to support further development • Availability of services in Guard House/Braithwaite considered to be poorly served – no meeting place, no GP surgery, no parks. • Stipulation should be put place that with new housing, there should be investment in leisure facilities.
4. Impact on the highway network: • Development in Keighley would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

Representation IDs: 476, 9823, 15497, 20750, 29104

Consultation Question 109 - Keighley South East Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
109	Local Area Strategy – Keighley South East	19	19	14	3	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt/greenfield land • Level of development • Impact on local infrastructure/services • Impact on highway network • Provision of open space/green space • Flood risk/drainage • Pollution • Loss of agricultural land • Consultation process was considered to be flawed and discriminated against those who did not have internet access • Proximity to South Pennine Moors SPA/SAC • Provision of affordable housing • Compliance with Local Plan policy • Site access • Impact on designated heritage assets • Impact on the highway network	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy KY1: Keighley, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. Development on Green Belt/greenfield land: • Objection to the development of Green Belt land in the Long Lee/Thwaites Brow area. • Development would contravene Government aims and objectives. • No exceptional circumstances to justify releasing land for the Green Belt, and the strategic case for doing so had not been demonstrated. • District has a plentiful supply of easily available brownfield sites including abandoned buildings and unused warehousing that had yet to be developed and should be considered first. • Should maximise the use of sustainable brownfield sites before considering changes to Green Belt boundaries. All alternative options should be examined/considered to meet housing needs • Suggested that unoccupied properties should be considered and/or compulsory purchased. • Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed and sites deleted from the plan. • Plan was not clear regarding which sites and how many were within the Green Belt, whilst it was noted that 77% were on greenfield/Green Belt land. • Queried as to the grounds being used to determine that Green Belt (and agricultural land) should be developed for housing**.**
2. Level of development: • Should be no building on any greenfield site in Long Lee/Thwaites Brow as there was no need for any more houses. • No justification for the proposed housing numbers identified in the Plan to warrant the removal of areas of Green Belt.
3. Impact on local infrastructure/services: • Impact on local infrastructure (roads, traffic, sewerage, doctors, school) not taken into account in drawing up the Local Plan. • Local infrastructure and services considered to be insufficient and a major drawback to development in the area, in particular within Long Lee/Thwaites Brow**.**

- Long Lee/Thwaites Brow highlighted as being served only by a single shop, primary school, pub and pharmacy as well as a limited (hourly) bus service that did not meeting existing demand.
- The primary school had limited places and issues with parking and road safety at times.
- The GP surgery, which was struggling to meet existing demands, was also noted as not being available for appointments as it was in use as a vaccination centre**.**
- Inadequate proposals were presented in the Plan in relation to upgrading local infrastructure to cope the with proposed extra housing and extra pressures on local services.
- No clear vision to increase passenger capacity on local public transport – contravening the Government's Decarbonising Transport strategic priority.

4. Impact on highway network:

- Road infrastructure in the Long Lee/Thwaites Brow area consider to be a significant issue and a major drawback to development.
- Further development would result in increased traffic through the area, particularly on Park Lane and Long Lee Road.
- Park Lane was highlighted as being the principal route to/from Keighley for residents, but suffered from a number of constraints/issues.
- Coney Lane/Park Lane bridges were highlighted as being a key constraint on the local road network. It is single carriageway, with tight bends and low railway bridge, causing a bottle neck and congestion in the area.
- The bridge would be overwhelmed by increased volumes of traffic from Park Lane, were further development to take place.
- Addressing the issue of Coney Lane bridge had been a requirement in previous Local Plans and when new housing developments were permitted in the area. However, this had not happened, and the constraint has remained.
- Highlighted that a committee decision was made in 2019 to put further development in the area on hold until it was dealt with. Suggested that the sites in the area be removed from the plan until the matter was addressed.
- Other roads in the Long Lee/Thwaites Brow were also experienced issues with their suitability to support growth including Moss Carr Road and The Twines (Thwaites Brow Road).
- Moss Carr Road was a narrow cul-de-sac that experiences issues with on-street parking that restricts its width, effectively reducing it to a single lane. This would make it unsuitable and not safe enough to support 103 dwellings.

• This road was also viewed as being in poor condition and suffering from poor drainage, which would be exacerbated by additional traffic and dwellings, leading damage to existing properties. • The Twines (Thwaites Brow Road) was noted as being a historic cobbled road that was unsuitable for many different vehicles and as route to reach the A650/A629.
5. Provision of open space/green space: • Concern over the lack of green space provision in the area, together with obtaining finance support it. • Community Infrastructure Levy (CIL) monies for open space were not easily obtained.
6. Flood risk/drainage: • Surface water drainage was highlighted as an issue that needed to be resolved in the Long Lee area.
7. Pollution: • Increased traffic coupled with the planned incinerator would add to pollution, in particular increasing air pollution levels, and traffic congestion in the area. • The plan did not take a holistic approach to the cumulative impact of development on the health of residents.
8. Loss of agricultural land: • Highlighted that Long Lee had significant amounts of agricultural land that is farmed by cattle farmers. As such, it would be wrong to replace it with development.
9. Consultation process: • Consultation process was considered to be flawed and discriminated against those who did not have internet access. • Was not enough time allowed for a through consultation process to take place, whilst no individual communications to residents was undertaken to tell them that it was occurring.
10. Proximity to South Pennine Moors SPA/SAC: • Proposed sites were highlighted as being located within the 7km buffer of the South Pennine Moors SPA/SAC.
11. Provision of affordable housing: • Queried whether any social housing will be built as part of new developments.

12. Compliance with Local Plan policy:

- Considered that the proposals were contrary to plan objective of "protecting and enhancing existing open spaces, green spaces, network and corridors"

13. Site access:

- Suggested that there no was no access available to any of the proposed sites.

Support

1. Impact on designated heritage assets:

- References to ensuring development conserves and enhances key heritage assets and their setting was welcomed.

2. Impact on the highway network:

- Accepted that housing sites needed to be identified.
- Highlighted that previous plans had required improvements to Coney Lane bridge before further housing could be developed.
- These improvements had not materialised but would be urgently needed with 500 new homes proposed.
- Suggested that traffic lights at the junction of Parkwood Street/Park Lane and a mini-roundabout at the junction of Coney Lane and Low Street may help with additional traffic volumes

Comments

1. Site KY22/H: Parkwood Rise.

- Site would support the Local Plan's approach to Keighley and contribute to the delivery of the Keighley South East Local Area Strategy and its 495 additional dwellings requirement.

2. Housing mix/tenure:

- Suggested that any new housing provided needed to they type that people want to live in, and that they are freehold.

3. Impact on highway network:

- Development will need to consider the access to Long Lee/Thwaites Brow via Park Lane and Coney Bridge.
- Proposed levels of housing could mean between 750 and 1,000 more cars using this road.

4. Impact on the highway network:

- Development in Keighley would not on its own have a severe impact on the Strategic Road Network.
- It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
- Swine Lane considered to unsuitable to accommodate more traffic.

Representation IDs: 363, 442, 473, 643, 971 ,4333, 4711, 5420, 5684, 7204, 8355, 9631, 15498, 17471, 28264, 28481, 28554, 29105, 29541

Consultation Question 110 - Keighley South West Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
110	Local Area Strategy – Keighley South West	9	9	6	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Provision of green/open space • Impact on the highway network • Impact on designated heritage assets • Impact on local infrastructure/services • Provision of affordable housing • Flood risk/drainage • Conservation and enhancements to key designated heritage assets and their setting was welcomed • Provision of green/open space	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy KY1: Keighley, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. Development on Green Belt land: • Objection to the development of Green Belt land. • District has a plentiful supply of brownfield sites that had yet to be developed.

- Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed and sites deleted from the plan.

2. Provision of green/open space:

- Areas proposed for development could be made better use of by building a park or playing field for recreation.

3. Impact on the highway network:

- Development would increase traffic on the highway network, putting children at increased risk
- Concerns expressed regarding access to existing/ongoing developments and the proposed sites.
- Issues exist in relation to level and speed of construction traffic on Camborne Way. Access to Branshaw Park and proposed sites off Occupation Lane should be taken from Oakworth Road rather than Wheathead Lane. Residents will continue to be impacted upon. Camborne Way considered to be at capacity.
- Full review and strategy required to address traffic issues in Keighley.

4. Impact on designated heritage assets:

- Further investment needed to rejuvenate and/or renovate heritage sites.

5. Impact on local infrastructure/services:

- Concerns about the ability of local infrastructure to support further development.
- Impact on local infrastructure (roads, traffic, sewerage, doctors, school) not taken into account in drawing up the Local Plan.
- Based on current infrastructure issues, the area could not sustain more pressure arising from development.

6. Provision of affordable housing:

- Queried whether any social housing will be provided as part of new development.

7. Flood risk/drainage:

- Existing development has given rise to flooding and drainage issues in the area. Additional, housing would make these problems worse.

Support

1. Impact on designated heritage assets:

- References to ensuring development conserves and enhances key heritage assets and their setting was welcomed.

Comments

1.	**Provision of green/open space:** • Area has no parks and limited open space. Imbalance should be addressed via the Local Plan.
2.	**Flood risk/drainage:** • Recent developments (Former Bronte School & Occupation Lane) in the Oakworth Road area had caused significant drainage issues.
3.	**Impact on local infrastructure/services:** • Area is not equipped to support further development
4.	**Impact on the highway network:** • Development in Keighley would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

Representation IDs: 285, 475, 748, 977, 7205, 15499, 20751, 29106, 29626

Sites

As highlighted above, **48** sites were put forward in the Preferred Options document to meet the proposed development requirements for Keighley (46 for residential and 2 for employment). Under Q111 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **409** representations were received in relation to policies KY1/H to KY50/E from **394** respondents. Respondents included Government bodies (Environment Agency, Historic England and Natural England), local residents, landowners/developers (and their agents), a Member of Parliament, a countryside charity, Canal & Rivers Trust, Keighley Town Council and Ward Councillors. It should be noted that many of the same respondents put forward representations on multiple sites. **Table 0.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.4**.

Table 0.3: Keighley Proposed Sites (KY1/H to KY50/E) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY1/H: Hollins Lane	4	4	1	2	1
KY2/H: Black Hill Lane	8	8	6	0	2
KY3/H: Whinfield Drive	2	2	0	1	1
KY4/H: Braithwaite Avenue/North Dean Road	2	2	0	1	1
KY5/H: North Dean Road	3	3	1	1	1
KY6/H: Holme Mill Lane	2	2	1	0	1
KY7/H: Wheathead Lane	20	19	16	1	3
KY8/H: Higher Wheathead Farm	16	15	12	1	3
KY9/H: Former Bronte School Playing Fields	4	4	3	0	1
KY10/H: Exley Road/Oakworth Road	28	28	27	0	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY11/H: West Lane	1	1	0	0	1
KY12/H: Keighley Road, Exley Head (1)	28	27	27	0	1
KY13/H: Keighley Road, Exley Head (2)	23	23	21	1	1
KY14/H: Bradford Road, Riddlesden	11	11	9	0	2
KY15/H: Carr Bank, Riddlesden	38	35	33	1	4
KY16/H: Carr Bank, Riddlesden	17	16	16	0	1
KY17/H: Former Church of Christ the King, Riddlesden	6	6	4	0	2
KY18/H: Moss Carr Road, Long Lee (1)	40	40	38	1	1
KY19/H: Moss Carr Road, Long Lee (2)	37	37	36	0	1
KY20/HC: Redwood Close	10	10	9	0	1
KY21/HC: Parkwood Rise (1)	2	2	1	0	1
KY22/H: Parkwood Rise (2)	4	4	1	0	3
KY23/H: The Walk	3	2	2	0	1
KY24/H: Marriner Road	2	1	1	0	1
KY25/H: Hainworth Road	2	2	1	0	1
KY26/H: Hainworth Wood Road	2	2	1	0	1
KY27/H: Hainworth Lane/Halifax Road	2	2	1	0	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY28/H: Staveley Way	2	2	1	0	1
KY29/H: Woodhouse Road	2	2	1	0	1
KY30/H: Beck Lane/Bridge Street	3	2	1	0	2
KY31/H: Cark Lane	1	1	0	0	1
KY32/H: James Street East	2	2	1	0	1
KY33/H: Parkwood Rise	2	2	1	0	1
KY34/H: Former Branshaw Special School, Nashville Street	2	2	0	1	1
KY35/H: Land off Golden View Drive, Thwaites	21	21	20	0	1
KY36/H: Long Lee Lane	19	15	12	2	5
KY37/HC: Former Ingrow Corn Mill	2	2	0	1	1
KY38/H: Worthville Farm, Dawson Avenue	1	1	0	0	1
KY39/H: Bradford Road	3	3	1	0	2
KY40/H: The Bungalow, Harden Road, Long Lee	13	13	12	0	1
KY42/HC: Land off Ryan Grove, Braithwaite	2	2	1	0	1
KY43/H: Grange Street	1	1	0	0	1
KY44/H: Parson Street	2	2	1	0	1

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY45/HC: Former Mortuary, Skipton Road	1	1	0	0	1
KY46/H: Land at Woodville Road	2	2	1	0	1
KY47H: Former site of Sandbeds Methodist Church, Swine Lane	1	1	0	0	1
KY49/E: Beechcliffe	6	5	2	1	3
KY50/E: Bradford Road	4	4	2	0	2
Totals	**409**	**394**	**325**	**19**	**65**

Table 0.4: Keighley Proposed Sites (KY1/H to KY50/E) - Summary of Representations Received

KY1/H: Hollins Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY1/H: Hollins Lane	4	4	1	2	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt/greenfield land • Housing mix • Support for the proposed site allocation • Impact on designated heritage assets • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1354 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. Development on Green Belt/greenfield land:

- Objection to the use of Green Belt/greenfield sites for development, when all options for new housing in inner town/city areas had not been exhausted.
- Would be contrary to current thinking and policy on climate change, preserving the environment, nature and wellbeing. Government policy is to protect Green Belt land to prevent urban sprawl.
- Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas

2. Housing mix:

- Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed.

• Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows.
Support:
1. Proposed site allocation: • The allocation is supported and considered to be deliverable as well as available, well-located within the urban with no known viability issues. Heritage constraints can be addressed.
2. Impact on designated heritage assets: • Proximity of Whinburn Lodge (Grade II Listed Building) and Gardens (Grade II Registered Park & Garden) was noted. Development could potentially harm elements that contribute towards their significance. • Conclusion of the Heritage Impact Assessment was supported; however, it was suggested that land identified as being of medium sensitivity should be removed from the allocation. • Development requirement for a Heritage Impact Assessment as part of any planning applications was supported.
Comments:
1. Flood risk/drainage: • The site located in Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 16523 ,28635, 29393, 29513

KY2/H: Black Hill Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY2/H: Black Hill Lane	8	8	6	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt • Potential for urban sprawl • Impact on biodiversity/wildlife • Impact on local infrastructure/services • Impact on amenity • Flooding/drainage • Housing mix • Proximity of South Pennine Moors SPA	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H545 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Development on Green Belt:**
   - Strategic case for exceptional circumstances to release Green Belt land have not been properly justified. No examination of alternative approaches such as increasing the amount of development being directed to urban brownfield sites or increases in densities to reduce the quantity of Green Belt needed.
   - All other options for all options for new housing in inner town/city areas had not been exhausted. The Plan should explore these brownfield options first.
   - Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas.
   - Would be contrary to current thinking and policy on climate change, preserving the environment, nature and wellbeing. Government policy is to protect Green Belt land to prevent urban sprawl.

2. Potential for urban sprawl: • Would increase the potential including opening up other sites in the area for development.
3. Impact on biodiversity/wildlife: • Would result in damage to or loss of wildlife and green habitats as well as natural views. • Green/open spaces should be cherished.
4. Impact on local infrastructure/services: • Additional infrastructure in the surrounding area would need to be provided. • The adjacent narrow land needed to be addressed.
5. Impact on amenity: • Potential impact on the amenity of adjacent properties and residents including loss of views, tranquillity and loss of light/sunlight as well as potential for overlooking. • Property prices would also be impacted upon.
6. Flooding/drainage: • Sloping nature of the site would increase drainage problems in the surrounding area.
7. Housing mix: • Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed. • Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows.
Support:
No representations received in support
Comments:
1. Proximity of South Pennine Moors SPA: • Potential to lead to loss of functionally land for SPA birds. • Site should be screened via model for identifying suitable sites for SPA Golden Plovers. • If loss of functionally linked land cannot be ruled out, it was recommended that the policy/supporting text should clearly set out the survey and mitigation requirements to be addressed.

2. Flooding/drainage:

- The site located in Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 608, 1369, 5485, 16287, 16524, 19891, 28636, 29518

KY3/H: Whinfield Drive

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY3/H: Whinfield Drive	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • The proposed allocation was supported • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H555 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No representations in objection received

Support:

1. **Proposed site allocation**:
   - The proposed allocation was supported.

Comments:

1. Flood risk/drainage:

- Site located within Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 20752, 28637

KY4/H: Braithwaite Avenue/North Dean Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY4/H: Braithwaite Avenue/North Dean Road	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • The proposed allocation was supported • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H563 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No representations in objection received

Support:

1. **Proposed site allocation:**
   - The proposed allocation on former Council operational site was supported.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 20753, 28638

KY5/H: North Dean Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY5/H: North Dean Road	3	3	1	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Loss of green space • The proposed allocation on former Council operational site was supported • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H567 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Loss of green space:**
   - Greenfield site within the urban area used as informal public open space.
   - Located with a Green Infrastructure corridor
   - Should be developed as community green space for residents to enjoy and nurture wellbeing.

Support:

2. **Proposed site allocation:**
   - The proposed allocation on former Council operational site was supported.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 1366, 20754, 28639

KY6/H: Holme Mill Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY6/H: Holme Mill Lane	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt/greenfield land • Housing Mix • Flood risk/drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant outline / full / hybrid planning permission.

Objections:

1. Development on Green Belt/greenfield land:

- Objection to the use of Green Belt/greenfield sites for development, when all options for new housing in inner town/city areas had not been exhausted.
- Would be contrary to current thinking and policy on climate change, preserving the environment, nature and wellbeing. Government policy is to protect Green Belt land to prevent urban sprawl.
- Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas

2. Housing Mix:

- Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed.
- Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows.

Support:

No representation received in support.

Comment:

1. **Flood risk/drainage:**
   - Part of the site is located within Flood Zones 2 (FZ2), 3 (FZ3) and 3ai (FZ3ai).
   - No development should take place within FZ3ai unless water compatible.
   - Development should follow a sequential layout to prevent un-necessary development in FZ2, FZ3 and FZ3ai.
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
   - Appropriate easement strips should be included to allow management/maintenance of the adjacent watercourse.

Representation IDs: 16525 ,28640

KY7/H: Wheathead Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY7/H: Wheathead Lane	20	19	16	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site/Highway Access • Flood risk/drainage • Impact on local infrastructure/services • Development on Green Belt/greenfield land • Impact on amenity • Housing Mix • The proposed site allocation was supported and confirmed as being available • Potential larger site allocation • Site access	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H568 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. Site/Highway Access:

- Concerns regarding ability of surrounding roads (Cambourne Way; Wheathead Lane; Oakworth Road) to accommodate existing and future traffic resulting from development.
- The existing network is already congested, a situation that will be made worse.
- Occupation Lane considered to be unsuitable – it is un-adopted and in poor condition as well as a bridleway that is well used by families, walkers, cyclists and horse riders. Site should only be considered if its adopted at no extra costs to residents.
- Significant number of dwellings are already served by Wheathead Lane.

- Persimmon development has resulting an increase in cars using Cambourne Way together with impacts on road surfaces, verges and drainage.
- Surrounding roads considered to be at capacity. Development would increase existing issues and take traffic to dangerous levels. It would mean the number of homes served by single road would exceed nationally recommended standards.
- Concerns over impact on the safety of local residents (children, pedestrians, cyclists and other road users) in the surrounding area.
- Alternative access options via the existing agricultural access from Wheathead Lane or via Occupation Lane, direct from Oakworth Road, should be considered.

2. Flood risk/drainage:

- Flooding, including surface water flooding is a key issue in the surrounding area. Gardens have suffered flooding.
- Existing drainage/sewerage system are unable to cope. Problem had worsened by the ongoing construction of the Persimmon development.
- Development would overload the system resulting in further flooding.
- Queried how surface water would be managed.

3. Impact on local infrastructure/services:

- Serious consideration needed to be given to the ability of local infrastructure support development including capacity of doctor's surgeries, schools and the highway network.

4. Development on Green Belt/greenfield land:

- No circumstances for amending Green Belt boundaries have been put forward. No clear examination of alternative approaches such as increasing the amount of development being directed to urban brownfield sites or increases in densities to reduce the quantity of Green Belt needed.
- All other options for all options for new housing in inner town/city areas had not been exhausted. The Plan should explore these brownfield options first.
- Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas.
- Would be contrary to current thinking and policy on climate change, preserving the environment, nature/biodiversity/habitats, pollution, loss of views and wellbeing as well as achieving zero carbon. Should be cherished, protected and prevent sprawl.

5. Impact on amenity: • Adjacent properties would be overlooked due the site's higher elevation, resulting in a loss of privacy.
6. Housing Mix: • Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed. • Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows
Support:
1. Proposed site allocation: • The proposed site allocation was supported and confirmed as being available.
Comment:
1. Flood risk/drainage: • The site is located within Flood Zone (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Potential larger site Site Allocation: • Site originally submitted as part of a wider site (SHLAA Ref: KY128), • Was seen as achievable and able to accommodate 135 dwellings. • Larger site would contribute to any additional residential uplift in the District. • Its allocation should be given further consideration.
3. Site access: • Access maybe from Occupation Lane, feeding onto Camborne Way. • Occupation Lane is a bridleway and popular pedestrian route, and not a public road, whilst Camborne Way is considered to be at maximum allowance due to the Persimmon development. • Any site access should not use either road, and be taken via the farm access road from Wheathead Lane.

Representation IDs: 752, 754, 782, 789, 975, 1070, 1336, 1367, 3477, 4709, 6103, 7207, 7493, 7495, 8158, 13492, 16511, 21136, 28641, 29519

KY8/H: Higher Wheathead Farm

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY8/H: Higher Wheathead Farm	16	15	12	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on the highway network • Impact on highway safety • Flood risk/drainage • Impact on local infrastructure/services • Development on Green Belt/greenfield land • Impact on amenity • Housing Mix • The proposed site allocation was supported and confirmed as being available • Potential larger site allocation • Site access	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H569 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Impact on the highway network:**
   - Concerns over the ability of Occupation Lane and surround roads to accommodate existing and future traffic resulting from development.
   - Local highway network is congested, a situation that will be made worse.
   - Occupation Lane considered unsuitable as the site access – it is an unadopted highway in a poor condition and part of bridleway used by families, walkers, cyclists and riders.

- Noted that a significant number of dwellings are already served by Wheathead Lane, whilst the ongoing Persimmon development has increased the number of cars using Camborrne Way and impacted on road surfaces, verges and drains.
- Local roads considered to be at capacity.
- Development would exacerbate these issues and take traffic to dangerous levels, with the number of homes service by a single road exceed nationally recommended standards.
- Suggested that the western end of Occupation Lane should be adopted by the highway authority at no cost to existing residents.
- Suggested that site access should be taken from existing farm access route from Wheathead Lane.
- Suggested that Occupation Lane should be directly accessed from Oakworth Road rather than via Camborne Way.

2. Impact on highway safety:

- Concerns over the impact of further development would have on the safety of local residents in the surrounding area.

3. Flood risk/drainage:

- Drainage a key issue within the site and its vicinity, particular the adjacent residential properties. Existing issues have not been addressed.
- Steeply sloping landscape has resulted in flooding to rear gardens and driveways.
- Existing drainage infrastructure considered inappropriate and does not meet requirements for support more development.
- Development would overload, resulting in further flooding in the surrounding area.
- Queried how surface water would be managed.
- Occupation Lane not connected to the drainage network.

4. Impact on local infrastructure/services:

- Consideration needs to be given to the ability of local infrastructure to support development including capacity of GP surgeries, schools and the highway network.

5. Development on Green Belt/greenfield land:

- All other options for all options for new housing in inner town/city areas had not been exhausted. The Plan should explore these brownfield options first.
- Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas.
- Would be contrary to current thinking and policy on climate change, preserving the environment, nature/biodiversity/habitats, pollution, loss of views and wellbeing as well as achieving zero carbon. Should be cherished, protected and prevent sprawl.

6. Impact on amenity: • Adjacent properties would be overlooked by new development. • Would result in loss of privacy and impacts on views • Loss of ability to enjoy the countryside.
7. Housing Mix: • Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed. • Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows
Support:
1. Proposed site allocation: • The proposed site allocation was supported and confirmed as being available.
Comment:
1. Flood risk/drainage: • The site is located within Flood Zone (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Site Allocation: • Site originally submitted as part of a wider site (SHLAA Ref: KY128), • Was seen as achievable and able to accommodate 135 dwellings. • Larger site would contribute to any additional residential uplift in the District. • Its allocation should be given further consideration.
3. Site access: • Access maybe from Occupation Lane, feeding onto Camborne Way. • Occupation Lane is a bridleway and popular pedestrian route, and not a public road, whilst Camborne Way is considered to be at maximum allowance due to the Persimmon development. • Any site access should not use either road, and be taken via the farm access road from Wheathead Lane.

Representation IDs: 750, 755, 781, 974, 3480, 4707, 6104, 7208 ,7494, 7496, 13493, 14375, 16512 ,21137, 24901, 28642

KY9/H: Former Bronte School Playing Field

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY9/H: Former Bronte School Playing Fields	4	4	3	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on the highway network • Impact on local infrastructure/services • Development on greenfield land • Housing mix • Proposed alternative use – green space • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H570 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Impact on the highway network: • Surrounding area is busy with traffic at all times of day. Further development would add to this, increasing safety risks to local children. • Concern about the number of sites to be served by Keighley Road/Oakworth Road.
2. Impact on local infrastructure/services: • Concerns over the potential impact on local infrastructure and its ability to cope. • Schools are at capacity and there are difficulties accessing medical facilities as well as obtaining dental appointments.
3. Development on greenfield land:

- Objection to development on greenfield land when all other options for new housing in inner town/city areas have not been exhausted
- Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas.

4. Housing mix:

- Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed.
- Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows

5. Proposed alternative use:

- Suggested that the site should be used for green space. This would reduce noise impacts on adjacent properties.

6. Flood risk/drainage:

- Development would increase flooding from surface water run-off.

Support:

No representations received in support.

Comment:

1. Flood risk/drainage:

- The site is located within Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 38, 4076, 16513, 28643

KY10/H: Exley Road/Oakworth Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY10/H: Exley Road/Oakworth Road	28	28	27	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on biodiversity/wildlife • Impact on protected trees • Sustainability Appraisal (SA) assessment • Flood risk/drainage • Impact on amenity • Impact on the highway network • Site access • Proximity to school • Loss of green space • Development of greenfield land • Location of development • Level of development • Housing mix • Alternative use - enhanced with woodland and use to promote community engagement on environmental matters and educations • Impact on local infrastructure/services • Impact on designated heritage assets	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H536) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:
1. Impact on biodiversity/wildlife: • Development would have substantial impact on wildlife, protected trees and wider natural environment. • Would be contrary to approaches to the environment and addressing climate change • Site is a rare green space in a very built up area, and assists in controlling pollution and conserving wildlife • Site home to a variety of wildlife including birds, deer, bats, foxes, hedgehogs and newts as well as grazing cattle.
2. Impact on protected trees: • Reference made to the presence of TPO trees and TPO woodlands within the site. • Considered to be an important woodland habitat to support wildlife • Should be retained/preserved. • Development would result in the loss of woodland.
3. Sustainability Appraisal (SA) assessment: • Considered that the SA assessment conclusions were incorrect as it stated that there would be "*minor adverse effects predicted of the natural environment/ a greenfield site which contains TPO woodland and trees and deciduous woodland priority habitat*"
4. Flood risk/drainage: • Surrounding area suffers from flooding, particularly surface water run-off, during periods of heavy rain. Issue had been exacerbated as resulting of recent developments. Proposed site would increase flood risk, • Concerns expressed regarding potential for flooding in areas to the east of the site (in Ingrow). Surface water noted are running down a footpath towards Ingrow Lane. • Drainage network considered to be overload and not able to support further development sufficiently. Development would place further strain upon it as well as on natural drainage systems. • Drainage network would require a complete and costly upgrade to avoid major flooding.

- Need to clearly demonstrate how surface water could be contained within the site (if this is the intention) before planning permission was granted.
- Not containing it within the site would result in increased flows into the Rivers Worth and Aire, adding to problems in already flood prone areas.
- Water pressures in the area are poor.

5. Impact on amenity:

- Neighbouring properties and community would suffer a reduction/loss of natural light to homes and gardens, loss of privacy due to overlooking, loss of views, increase noise levels/noise pollution and light pollution.
- Negative impacts on the quality of life of existing and future residents by creating an overcrowded space due the scale of development proposed, increased pollution and impact on property values resulting from loss of green space.

6. Impact on the highway network:

- Development would result in increased traffic levels using the local road network, which is considered to be heavily trafficked and in poor condition. Particular reference made to Oakworth Road being busy and congested
- Roads could not support further development. Existing problems would be exacerbated.
- Concern over the impact of construction traffic from previous and current developments. Viewed as a safety risk. Oakworth Road noted as having speeding issues.
- Assessment of impact on air quality and road safety (as well as public transport accessibility) should be undertaken.
- Further traffic would lead to increased levels of air and noise pollution.

7. Site access:

- Potential site access points consider to be inappropriate or unsuitable.
- An access from Oakworth Road would impact on an already busy and dangerous junction where three roads meet. Traffic lights were suggested as a means addressing any impacts.
- Access point for Exley Road considered to be too narrow, whilst one from Oakworth Road would be too steep and impact on road safety around the school.

8. Proximity to school:

- Site located adjacent to Oakbank Secondary School.
- Concerns over the impact of additional traffic arising from construction and occupation of dwellings on the health and safety of pupils making their way to/from school.
- Proposed allocation overlooks the value that the greenfield setting contributes to the wellbeing of the school pupils and staff.
- Serves as a buffer between existing residential areas and the school. New residents on the site would be impacted upon by the school.

9. Loss of green space:

- Objections to the loss of green space
- Keighley West area has limited number of green spaces. The site provides a valuable space and green corridor for the area.
- Site is the only area of open land in densely populated area that had experienced significant housing development in recent years. As such, it should remain as open space.
- Site provides a green lung adjacent to the busy, pollution Oakworth Road and has a positive impact on air pollution.
- Concerns expressed that there would be no open space between Keighley and Haworth left for residents to enjoy. Site is used for recreation, particularly during the COVID 19 pandemic.

10. Development of greenfield land:

- Objection to the development this greenfield land/site
- Such areas should not be eroded and instead protected.
- Considered that other options for housing development should be exhausted, with proposals to build on greenfield site reconsidered.
- Contrary to emerging thinking on climate change, environmental preservation, nature and wellbeing.

11. Location of development:

- Suggested that other locations should be utilised for development instead of the proposed site (and greenfield land more generally).
- Sufficient brownfield sites, vacant buildings and derelict land/buildings available within Keighley and the District as whole, that should be developed or renovated first, with all options being explored.

- Using these sites, building and areas would help to regenerate and improve Keighley. Some of these are an important element of the area's heritage.
- Reference made to using retail premises that may become available in the coming years due to changes in demand.
- Keighley town centre highlighted as having a large number of empty buildings that could be converted. Proposed Aldi site should be considered for housing.

12. Level of development:

- Concerns over the impact that development would have on the level of growth and density in the area. The area is already densely populated.
- Adding 125 dwellings should result a significant increase in housing in a small space. Would create a housing density that would be high compared to the surrounding area.
- Area was viewed as overdeveloped with no need for further housing.
- Noted that a number of developments had already taken place or were under construction in the area.

13. Housing mix:

- Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed.
- Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows.

14. Alternative use:

- Site should be enhanced with woodland being used to promote community engagement on environmental matters and educations.
- Pandemic should be a call to re-assess development, with health, wellbeing and environmental impacts taking precedence.

15. Impact on local infrastructure/services:

- Concern over the impact of development on local infrastructure and services.
- Further strain would be placed on local schools and healthcare facilities as well as local shops. Reference made to the lack of ability of a nearby GP practice to take on more patients
- Queried whether there was infrastructure in place to support development.
- Adjacent footpath is privately owned and should not be used.

16. Impact on designated heritage assets:

- Site contains a Grade II Listed Building (cross at junction with Wheathead Lane) and is close several other Grade II Listed Buildings (nos. 67, 71 & 73 Exley Road).
- Concerns that development harm elements that contribute to the significance of these designated heritage assets.
- An assessment should be undertaken before allocation of the site's contribution towards those elements that contribute towards the assets significance and the impact that development would have.

Support:

No representations received in support.

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 203, 286 ,443, 855, 886, 963, 1095, 1151, 1509, 1539, 1562, 1565, 793, 2534, 2975, 3410, 4159, 4798, 9822, 16271, 16514, 16962, 19539,20757, 24685, 28531, 28644, 29394

KY11/H: Former Devonshire Mill, West Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY11/H: West Lane	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H537) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28645

KY12/H: Keighley Road. Exley Head

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY12/H: Keighley Road, Exley Head (1)	28	27	27	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage • Site access • Impact on highway safety • Impact on amenity • Impact on character • Location of development • Level of development • Housing mix • Impact on local infrastructure/services • Impact on biodiversity/wildlife • Development of Green Belt/greenfield land • Loss of green space/open space • Land stability • Provision of employment	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H538 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Objections:
1. Flood risk/drainage:

- Surrounding area, in particular Moorlands Avenue, suffers flooding due to surface water run-off from the site as well as from altered land drains.
- Would be made worse by development of the site, with the level of flooding experienced increasing.
- Ongoing/recent developments have exacerbated flooding in the surrounding area, including along Oakworth Road creating dangerous driving conditions.
- Concerns regarding the ability of the drainage network within the site's vicinity, in particular on Keighley Road and Oakworth Road to cope with existing flows. Considered to be overwhelmed.
- Natural springs present on site, whilst a stream runs through its centre to a well in one of the corners and ground water issues. The well was an essential outlet for run-off, which would be lost if the site were to be developed.
- Additional burdens would be place on the drainage network and flooding increased.

2. Site access:

- Access via Moorlands Avenue considered to be insufficient, unsuitable or unrealistic. No existing roads were suitable for access and could not be upgraded easily.
- Moorlands Avenue was limited in nature, not wide enough and busy with on-street parking. Parking issues experienced by residents.
- Development would increase traffic flows and exacerbate existing issues as well as increasing levels of congestion and pollution.
- Concern regarding accessing difficulties experience by emergency services as well as by residents/others during the winter period.
- Gradient of Moorlands Avenue was an issue, particularly for construction vehicles.

3. Impact on highway safety:

- Increased traffic resulting from development would pose a greater risk to the safety of residents, in particular children and older people.
- Could lead to an increase in the risk of accidents at the junction of Moorlands Avenue and Oakworth Road.
- Junction viewed as difficult due to on-street parking that reduces visibility as well as current traffic levels. Adding further vehicles to Oakworth Road would be dangerous.

4. Impact on amenity:

- Site's elevation means that adjacent properties would be overlooked with a loss of privacy and loss of light.

5. Impact on character:

- Suggested that rooflines of new dwellings should designed to mirror those of adjacent properties on Moorlands Avenue.

- Adjacent public footpath well used by residents for countryside walks and recreation. Development increase its use and bring an increase in anti-social behaviour.
- Concern regarding the impact on resident's health and wellbeing and a reduction in the area's rural character as well as potential for settlement coalescence.

6. Location of development:

- Were more suitable areas/locations where residential development could take place instead of using greenfield land.
- Plenty brownfield sites that could, and should, be use together with derelict or unused buildings, properties and land.
- Plan should be amended to explore such options.
- Brownfield land located close to public transport links and jobs.

7. Level of development:

- Need for further housing in the area was questioned as there were a number of recently constructed properties that remained unsold, whilst others were still being developed.
- Oakworth was considered to be over-developed.

8. Housing mix:

- Concerns that new housing will 3 or 4 bed executive homes.
- Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows.

9. Impact on local infrastructure/services:

- Development would place strain existing infrastructure.
- Infrastructure considered to be lacking in the area, and in the case of Oakworth, inadequate.
- Primary schools were over-subscribed and lacking places, whilst GP/medical facilities were in a similar situation. Recent development had not led to increases in school places or GP provision.
- Lack of convenience shops in the locality and recreation provision was inadequate.

10. Impact on biodiversity/wildlife:

- Development would adversely impact on wildlife and the nature conservancy in the area due to noise and disturbance.
- A range of animals had been regularly seen on the site.
- Green spaces vital for the environment. Would have a devastating impact on wildlife.

11. Development of Green Belt/greenfield land:

- Objection to the loss of Green Belt/greenfield land in the area.
- Considered that all other options for housing development in inner town/city areas should be exhausted first.
- Contrary to emerging thinking on climate change, environmental preservation, nature and wellbeing.
- Green Belt should remain as green space and protected to prevent sprawl as well as provide a space for farming and wildlife.
- Loss of greenfield land contrary to policy set out in the NPPF, which seeks their protection and the use of brownfield land. The Plan does not do so.

12. Loss of green space/open space:

- Concern regarding the loss of green spaces and footpaths that support the health and wellbeing of local people, particularly in an area where the quantity of such spaces is limited.
- Suggested that green spaces should be retained as such.

13. Land stability:

- Concerns over the strength and stability of the wall to the rear of existing properties that supports the access road to Brown Springs Farm, and whether it can accommodate further traffic (including construction traffic).
- Noted that a former quarry listed in the plan forms part of the adjacent Occupation Lane development.

14. Provision of employment:

- Area lacks employment opportunities.

Support:

No representations received in support.

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 564, 565, 575, 576, 930, 940, 956, 980, 989, 991, 1385, 1453, 1487, 1501, 1516, 1637, 2079, 2084, 2697, 2785, 2792, 3001, 3126, 4017, 16288, 16515 ,20758, 28646

KY13/H: Keighley Road, Exley Head

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY13/H: Keighley Road, Exley Head (2)	23	23	21	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage • Ground conditions • Site access • Impact on the highway network • Level of development • Housing mix • Impact on local infrastructure/services • Impact on character/amenity • Impact on visual amenity • Development of greenfield land/loss of open space • Location of development • Impact on biodiversity/wildlife • Site boundary • Proposed site allocation was supported. It is available for development	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H539 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Objections:

1.	**Flood risk/drainage:** • Surrounding area and properties have experience flooding due to surface water run-off. • Would make the situation worse and place further pressure on the drainage network, which is already struggling to cope. • Issue would continue, if adequate drainage is not put in place. • Occupation Lane development resulting in a detrimental impact on the drainage network and damage to road surfaces. • Flood risk would be worsened elsewhere, in particular lower down in the valley. • Site contains a number of natural springs that also cause flooding and impacts on the ability of the land drainage system to manage flows.
2.	**Ground conditions:** • Considered to be unsuitable for residential development due to issues with surface water and the fact that part of the site permanently wet.
3.	**Site access:** • Site access and its suitability strongly questioned. • Considered that there was no suitable access point or would be difficult to achieve. • Would require significant works that would cause disruption to neighbouring properties during and after construction. • Proposed access point via Thornhill Avenue has a number of issues. It is a congested cul-de-sac and tight in nature. Not suited to an increase in traffic. • Street noted as having a steep gradient –potentially unsuitable for construction traffic. • Farm track is privately owned and reserved for farm traffic.
4.	**Impact on the highway network**: • Would bring an increase in vehicle traffic to the area, creation congestion, impacting on road safety and causing disturbance to residents. • Junction between Thornhill Avenue, Keighley Road and Goose Cote Lane considered to be dangerous due to on-street parking. Further development would increase the risk of accidents. • Local roads considered to be unsuitable, whilst additional traffic would impact on residents.

- Issue with heavy traffic flows on Lidget, Station Road and Dockroyd Lane at school times.

5. Level of development:

- Need for further housing in the area questioned due to the number of new homes that been built or were still under construction.
- Reference made to recently completed development on part of the former Bronte School Playing Fields, and the ability for it to be expanded. Suggested there was no need for further development as a result.
- Oakworth considered to be over-developed.

6. Housing mix:

- Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed.
- Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows.

7. Impact on local infrastructure/services:

- Concerns regarding the impact of development on local infrastructure and services.
- Local infrastructure/amenities considered to be lacking or inadequate, and viewed as being at capacity and unable to support 80 more dwellings. Development would place further strain upon them and/or overload them
- Primary schools, in particular Oakworth, are oversubscribed and lacking places. Queried whether or not it could expand. GP surgery considered to be in a similar situation
- Oakworth needed more facilities before a larger number of homes could be built.

8. Impact on character/amenity:

- Recent development had impacted upon the character of the area and resulted in the loss of views. Further development would exacerbate this.
- Existing properties would be surrounded by development
- Skyline would be altered due to the site's elevated, having implications for the profile of any new housing. Would constitute overdevelopment and create congestion. Housing would need to be sympathetic to area.
- Land used for recreational purposes.

- Neighbouring properties would be overlooked and overshadowed, lead to a loss of privacy and loss of light. Impacts would arise from construction and occupation of any new dwellings.
- Health and wellbeing would be impacted upon, whilst there would be increased noise and disturbance.
- Recent development had caused disruption and damage to property as result of the use of piling.
- Development will result in a reduction in property values, whilst recent development had been accompanied by a rise in crime rates.

9. Impact on visual amenity:

- Would be a negative impact on visual amenity including the loss of wildlife and the general ambience of the area.

10. Development of greenfield land/loss of open space:

- Objections relating to the development of greenfield land and loss of green spaces.
- Considered to be detrimental to the community and its health and wellbeing as well impacting on wildlife.
- Area highlighted as lacking in open/green spaces. The site should remain as such.
- Development of greenfield land contrary to current thinking on climate change, environmental preservation, nature and wellbeing. Policy is that Green Belt should be protected and prevent sprawl.

11. Location of development:

- All other options for new housing in inner town/city areas should be exhausted before considering greenfield land. Plan should be reconsidered to explore them.
- Considered that there were other brownfield sites that could and should be used first.
- Suggested sites included former British Gas site (Bradford Road), former school sites and vacant site on Whinfield Drive.
- Keighley town centre highlighted as having a large number of empty buildings that could be converted. Proposed Aldi site should be considered for housing.

12. Impact on biodiversity/wildlife:

- Would have negative impacts on flora, fauna and wildlife in the area.

13. Site boundary:

- Noted that the site is separated from proposed site KY12/H by a small piece of land.

• Considered that both sites could be merged together in future.
Support:
1. Proposed site allocation: • Proposed site allocation was supported. It is available for development. • Suggested that that a further piece of land, adjoining Keighley Road is included as part of the site allocation. This would provide an additional access point.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 198, 660 ,1096, 1482, 2109, 2877, 2977, 3119, 3127, 3202, 3450, 3462, 3883, 4057, 4694, 4944, 5693, 7449, 14784, 16289, 16516, 20759, 28647

KY14/H: Bradford Road, Riddlesden

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY14/H: Bradford Road, Riddlesden	11	11	9	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Impact on biodiversity/wildlife • Loss of open space • Land ownership and availability • Proximity and impact to designated heritage assets • Impact on amenity • Impact on visual amenity • Topography • Flood risk/drainage • Impact on local infrastructure/services • Impact on the highway network • Proximity to South Pennine Moors SPA/SAC	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H419) is not carried forward as a preferred option and excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

1. **Development of Green Belt/greenfield land:**
   - Contrary to Government policy. Exceptional circumstances for its use had not been demonstrated.
   - There were sufficient brownfield sites, including abandoned buildings that could be used instead.
   - Empty/occupied properties should be brought back into use.

• Alternatives to the use of greenfield land should be examined
2. Impact on biodiversity/wildlife: • Site critical to the area's wildlife. Development would have an impact.
3. Loss of open space: • Site critical to supporting the community's wellbeing – it is an area of open space. • Such areas of open space viewed as being well-used and important for local people including for exercise, and should be retained. • Community views were not being respected. • Land was for recreational/community uses.
4. Land ownership and availability: • Site in National Trust (NT) ownership • NT does not sell land for development, meaning compulsory purchase would be required. This would mean attention and objections disproportionate to the site's size. • Land considered to be unavailable for development. • Site currently used as grassland that forms part of the setting of East Riddlesden Hall and conservation plans for it. Should be removed from the Local Plan.
5. Proximity to designated heritage assets: • Site located less than 200m from East Riddlesden Hall & Barn (Grade I Listed) and seven Grade II Listed Buildings and structures associated with them. • Concerns that development harm elements that contribute to the significance of these designated heritage assets. • An assessment should be undertaken before allocation of the site's contribution towards those elements that contribute towards the assets significance and the impact that development would have.
6. Impact on amenity: • Outlook of surrounding properties would be blighted as a result of development due to loss of open views. • Potential reduction in property values. • Would impact on the river walk from East Riddlesden Hall, making it less enjoyable and reducing the number of visitors, with the resultant loss of visitor income.
7. Impact on visual amenity:

- Would block longer distance views over the Aire Valley and towards Haworth.

8. Topography:

- Site's topography considered to be a constraint to development

9. Flood risk/drainage:

- Site in close proximity to the flood plain, and partly at risk of flooding. Flooding on occasion had reached the northern boundary.
- Development bordering a flood plan would cause technical issues and add to construction costs due to need to provide flood defences (and financial consequences if they are not).

10. Impact on local infrastructure/services:

- Infrastructure (roads, traffic, sewerage, doctors, schools) had not been taken into account when drawing up the Local Plan.
- Access to primary schools from the site was limited. Over-subscribed schools would lead to children travelling elsewhere, increasing vehicle us and pollution.

11. Impact on the highway network:

- Levels of traffic and congestion would be increased whilst there would be an impact on air quality.

12. Impact on designated heritage asset:

- Site is 200m from Grade I Listed East Riddlesden Hall & Barn and seven other Grade II Listed Buildings
- Concerns that development harm elements that contribute to the significance of these designated heritage assets.
- An assessment should be undertaken before allocation of the site's contribution towards those elements that contribute towards the asset's significance and the impact that development would have.

Support:

No representations received in support.

Comment:

1. Proximity to South Pennine Moors SPA/SAC:

- Site located within close proximity to the South Pennine Moors SPA.
- Potential to lead to the loss of functionally linked land for SPA birds.
- Approach in the Local Plan, SPD and assessment to loss of functionally linked land welcomed.
- Recommended that the site is screened via the model for identifying suitable sites for SPA Golden Plovers.

• Where the loss of functionally linked land cannot be ruled out, it was recommended that allocation requirement text in the plan sets out survey and mitigation requirements clear.
2. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1), but adjoins Flood Zones 2 (FZ2), 3 (FZ3) and draft zone 3b (FZ3b). • Site may be subject to future risk identified in the SFRA – may affect its allocation or future layout. • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 1595, 3007, 4476, 6808, 6998, 7146, 19889, 21020, 28648, 29003, 29395

KY15/H: Carr Bank, Riddlesden

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY15/H: Carr Bank, Riddlesden	38	35	33	1	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Location of development • Settlement boundary • Overall level of development • Flood risk/drainage • Ground conditions and stability • Impact on the highway network • Impact on amenity • Impact on wildlife/biodiversity • Impact on green/open space • Impact on local infrastructure/services • Impact on high voltage electricity line • Impact on designated heritage assets • Local Plan consultation process • Site allocation supported • Site Specific Green Belt Assessment	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H540) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:
1. Development of Green Belt land:

- Objection to the development of Green Belt land, including strong objections to the proposed site allocation within the Local Plan.
- Green Belt should continue to be protected as once lost it could not be replaced. Its openness would also be impacted upon.
- Concerns over the ability to define a stronger Green Belt boundary were the site to be developed. Reference made to the conclusions of the site specific Green Belt Assessment.
- Would be potential open up additional areas of land between East Morton and Riddlesden that would continue urban sprawl and lead to settlement coalescence.
- Use of Green Belt contrary to Government aims, objectives and policies. Policy is to maximise the use of brownfield sites in preference to greenfield or Green Belt one. Should only be used in exceptional circumstances.
- Were no exceptional circumstances to justify releasing land from the Green Belt, nor had the strategic case for doing so been demonstrated or identified.
- All alternative options should be examined and considered to meeting housing needs. No clear examination had been undertaken of alternative approaches such as increasing the quantity of development on brownfield sites or increasing densities to reduce the level of Green Belt required.
- Contrary to other policies and thinking on achieving zero carbon, environmental preservation, loss of identify, damage to wildlife/habitats, loss of views and pollution.

2. Location of development:

- There are sufficient accessible and available brownfield site that should be use for future housing development first instead of greenfield or Green Belt land.
- No evidence put forwards setting out details of how brownfield sites have been considered.
- Suggested that areas that became redundant during the pandemic, abandoned buildings or warehousing, and empty residential properties should be made use of.

3. Settlement boundary:

- Site should be classed as being in East Morton rather than forming part of the Riddlesden and Keighley areas.
- Area is within the school catchment area for East Morton Primary School and Bingley Grammar School.
- Being classed as Riddlesden would mean that catchment areas were being redrawn to add it to the Keighley catchment with resultant detrimental impacts and property devaluation.

• Site development would have a significant effect on the character of East Morton village.
4. Overall level of development: • Further residential development was not wanted. • No justification or the proposed housing numbers identified in the Plan to warrant the removal of areas of Green Belt.
5. Flood risk/drainage: • Site and surrounding area, including Waterside Fold suffers from flooding and drainage issues. • Flooding caused by surface water run-off from the adjacent moors. Development would add to this problem and remove opportunities for water to be absorbed**.** • Permeable fields would be replaced by impermeable surfaces, which in turn would increase the speed of water run-off being discharged into the canal and River Aire. • The drainage network is inadequate and can be overwhelmed at times by water running off the fields. Particular issues occur during periods of cold weather when water freezes causing access problems. • Several underground watercourses and springs are present within the site, adding to drainage issues. • Noted that the Council's drainage team was working with Swime Lane residents to mitigate ongoing flooding issues. Suggested that little could be done due to sloping terrain and natural occurrences.
6. Ground conditions and stability: • Old mine workings present within the site. • Site is very wet and steeply graded. • Whilst not impossible to overcome, the required groundworks may make the site unattractive to developers.
7. Impact on the highway network: • Concerns related to the impact that development would have on traffic levels and the highway network in the surrounding area (Waterside Fold estate, Swine Lane, East Morton) • Would result in an increased number of vehicles using the roads in the area to access the site, in particular Thorneycroft Road – an estate road with several pinch points and on-street parking that narrows its width in places. • Saxilby Road was considered to be difficult and struggling to cope with existing traffic volumes. Parking is a key issue for residents.

- The wider network was viewed as struggling to cope with existing traffic and congested, with further development exacerbating this.
- Swine Lane canal bridge was noted as being single track and under strain, whilst its ability to accommodate more vehicles was questioned.
- Junction of Carr Lane, Swine Land and Thorneycroft Road would require improvement.
- Additional vehicles would impact on air quality and pollution levels. Disruption would be caused to residents, whilst the risk of accidents would be increased.

8. Impact on amenity:

- Concerns regarding impacts on amenity of existing properties and increased disturbance should the site be developed.
- Potential for overlooking, overshadowing, loss of privacy, loss of light, loss of visual amenity, loss of countryside views, increased nuisance and noise pollution. Access to properties would also be affected.
- Development, coupled with the proposed incinerator, would have a negative impact on the community's health and wellbeing and contribute towards climate change. Would increase congestion and affect air quality.

9. Impact on wildlife/biodiversity:

- Area highlighted as being home to a range of wildlife including various animals, birds and insects as well as habitat, all of which would be impacted upon by development.
- Bats, owls, woodpeckers, hedgehogs, deer, wood mice, voles and frogs as well as birds of prey present on the site.
- Trees would also be affected.

10. Impact on green/open space:

- Green spaces used by local people for leisure and recreation, which would be lost if development were to occur.
- Potential impact on Bury Lane (an old path/bridleway) that adjoins the proposed site.
- Environmental buffer to the path would be removed, whilst development would detract from the valuable leisure amenity that provides links the open moorland.

11. Impact on local infrastructure/services:

- Ability of local infrastructure and services to support further growth was questioned. Plan did not include any provision for infrastructure or never taken into account in drawing it up.

- Existing infrastructure was considered to be under pressure, with specific reference made to the sewage network, railway station parking, schools, hospitals, transport and emergency services.
- Emphasis on the capacity of local schools (East Morton and Crossflatts Primary Schools) to accommodate more pupils. Both considered to be over-subscribed or under pressure.
- Suggested that development would exacerbate the situation at the primary schools. Queried where the additional children would go to school.
- Noted that the catchment area for East Morton Primary School and Bingley Grammar School runs through the Waterside Fold estate. Queried how existing residents and children would be affected by further development and changes in the catchment. Any changes may lead to a reduction in property values.
- Public transport was lacking, but also busy at peak times, meaning residents cannot easily use services.
- Other facilities, e.g. shops, health services and leisure provision, were also lacking in the area, which encourages residents to drive to access them impacting on the road network and creating pollution.
- Plan presents inadequate proposed regarding the upgrading of local infrastructure to cope with the proposed extra housing and address pressures on local services.
- No clear vision to increase passenger capacity on local public transport – contravening the Government's Decarbonising Transport strategic priority.

12. Impact on high voltage electricity line:

- Site crossed by 132kV high voltage overhead electricity transmission line.
- Concerns relating to building beneath it. Would need to be relocated or removed were development to take place.

13. Impact on designated heritage assets:

- Several designated heritage assets (a Schedule Monument and several Grade II Listed Buildings) present within, and in close proximity to, the site.
- Development could harm elements that contribute the significance of those designated heritage assets.
- An assessment should be undertaken (before allocation) of the site's contribution towards those elements that contribute towards the designated heritage asset's significance and the impact that development would have.

- References to the Scheduled Monument related to the Bradford Aqueduct, which could not be removed and may place a physical restriction on the site's use.

14. Local Plan consultation process:

- Community wishes not being respected
- Objection to the management of Local Plan consultation process.

Support:

1. Proposed site allocation:

- Site allocation supported. Considered to in a suitable and sustainable location, with no technical or environmental constraints to preclude development.
- Would allow the openness of the Green Belt to be remain, whilst a new boundary could be provided. Would not harm Green Belt purposes.
- Access available from surrounding roads.
- Site available.

Comment:

1. Site Specific Green Belt Assessment:

- Conclusions of the Green Belt Assessment was challenged.
- Considered that development would not result in unrestricted urban sprawl and merging of adjacent settlements
- It does not assist in safeguarding the countryside from encroachment and have a detrimental effect on the setting and special character of historic features.
- Would not adversely affect Green Belt purpose 5.
- Considered that landscape, recreational and biodiversity opportunities that could take place would contribute towards providing compensatory improvements.

2. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 619, 927, 1135, 1136, 1596, 2293, 2433, 3372, 5515, 5580, 5668, 6188, 6809, 7148, 7356, 7829, 7963, 8159, 9623, 10912, 13034, 16290, 17075, 17983, 19890, 19906, 25289, 26443, 26937, 27915, 28095, 28130, 28256, 28429, 28430, 28649, 29396, 29520

KY16/H: Carr Bank, Riddlesden

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY16/H: Carr Bank, Riddlesden	17	16	16	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Overall level of development • Impact on the highway network • Impact on wildlife/biodiversity • Impact on green/open space • Development of greenfield/Green Belt land • Impact on amenity • Impact on local infrastructure/services • Flood risk/drainage • Consultation process	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H541 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Overall level of development: • Objection to the overall level of development proposed for the Carr Bank area – a combination of sites KY15/H and KY16/H. • Both sites would contribute to large scale sprawl towards East Morton and result in a number of properties being surrounding by growth.
2. Impact on the highway network: • Existing highway network in the Carr Bank/East Morton area was already busy and struggling to cope with existing traffic levels.

- Development would increase the level of traffic on surrounding roads, causing congestion and impact on key points (junction of Carr Mount, Carr Lane and Swine Lane; Swine Lane canal bridge).
- Increased traffic would lead more disturbance to residents during and post construction, and their quality of life as well as impacting on air quality.
- Area lacks parking. Childrens' home being present means residents being unable to park. Problem would be made worse.
- Parking on Swine Lane/Carr Lane not a suitable option. Poses danger to other road users.

3. Impact on wildlife/biodiversity:

- Area highlighted as being home to wildlife.

4. Impact on green/open space:

- Green spaces used by local people for leisure and recreation, which would be lost if development were to occur.
- Potential impact on Bury Lane (an old path/bridleway) that adjoins the proposed site.
- Environmental buffer to the path would be removed, whilst development would detract from the valuable leisure amenity that provides links the open moorland.

5. Development of greenfield/Green Belt land:

- Objection to development of greenfield/Green Belt land. Should remain as green space and not be developed.
- Contrary to Government policy as well as other local policies including those relating to achieving zero carbon, loss of identity, impact on wildlife/habitats, loss of views and pollution.
- Green Belt development should only take place in exceptional circumstances. These have not been identified.
- Plenty of brownfield sites that could be redeveloped to avoid using Green Belt land. All alternatives should be examined.
- Reference made to the quantity of employment sites/premises that could be used instead.

6. Impact on amenity:

- Concerns about the impact on the amenity of existing properties and increase disturbance should the site be developed.
- Potential for overlooking, overshadowing, loss of privacy, loss of light, loss of visual amenity, increased nuisance and noise pollution.

7. Impact on local infrastructure/services:

- Ability of local infrastructure and services to support further growth was questioned. Plan did not include any provision for infrastructure or never taken into account in drawing it up.
- Emphasis on the capacity of local schools (East Morton and Crossflatts Primary Schools) to accommodate more pupils. Both considered to be over-subscribed or under pressure.
- Suggested that development would exacerbate the situation at the primary schools. Queried where the additional children would go to school.
- Noted that the catchment area for Bingley Grammar School runs through the Waterside Fold estate. Queried how existing residents and children would be affected by further development and changes in the catchment.
- Public transport was lacking, but also busy at peak times, meaning residents cannot easily use services.

8. Flood risk/drainage:

- Area, including Waterside Fold, suffers from flooding and drainage problems, mainly resulting from inadequate drainage and run-off from adjacent fields.

9. Consultation process:

- Community wishes not being respected.
- Objections to the Local Plan consultation process.

Support:

No representations received in support.

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 1139, 1597, 6189, 6810, 7149, 9624, 9949, 13035, 17076, 17984, 25290, 26444, 26938, 28105, 28131, 28650, 29521

KY17/H: Former Church of Christ the King, Riddlesden

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY17/H: Former Church of Christ the King, Riddlesden	6	6	4	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Impact on biodiversity/wildlife • Loss of open space • Impact on trees • Retention of existing building • Impact on local infrastructure/services • Proximity to Leeds & Liverpool Canal Conservation Area • Flood risk/drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission.

Objections:

1. **Development of Green Belt/greenfield land:**
   - Contrary to Government policy. Exceptional circumstances for its use had not been demonstrated.
   - There were sufficient brownfield sites, including abandoned buildings that could be used instead.
   - Empty/occupied properties should be brought back into use.
   - Alternatives to the use of greenfield land should be examined.
2. **Impact on biodiversity/wildlife:**
   - Site critical to the area's wildlife
3. **Loss of open space:**

- Site critical to supporting the community's wellbeing – it is an area of open space.
- Such areas of open space viewed as being well-used and important for local people including for exercise, and should be retained.
- Community views were not being respected.

4. Impact on trees:

- Concerns of the impact on existing cherry trees fronting onto Bradford Road. These contribute to the area's attractiveness.

5. Retention of existing building:

- The existing church building should be refurbished rather than demolished and replaced with buildings of a lesser design quality that may not be in keeping with the area.

6. Impact on local infrastructure/services:

- Impact on local infrastructure (roads, traffic, sewerage, doctors, school) not taken into account in drawing up the Local Plan.

7. Proximity to Leeds & Liverpool Canal Conservation Area:

- Development could harm elements that contribute to the significance of this designated heritage asset.
- Reference to its proximity as a constraint in the site pro-forma welcomed.
- Development considerations in the pro-forma should be more positively worded. Suggested wording was provided.

Support:

No representations received in support.

Comment:

1. Proximity to Leeds & Liverpool Canal:

- Site is located at a lower level than the adjacent canal and potentially vulnerable to flooding from any breach or leakage. Should be considered as part any flood risk assessment, including potential mitigation to reduce the risk in the event of a breach. Risk should be listed as a development consideration
- Need ensure development does not result in land instability in relation to the canal embankment. Should be listed as a development consideration.

2. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 1373, 6811, 7151, 13659, 28651, 29398

KY18/H: Moss Carr Road, Long Lee

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY18/H: Moss Carr Road, Long Lee (1)	40	40	38	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Overall level of development • Location of development • Site access • Impact on the highway network • Impact on local infrastructure/services • Housing mix • Development of greenfield/Green Belt land • Impact on biodiversity/wildlife • Impact on leisure and recreation • Flood risk/drainage • Ground conditions • Impact on designated heritage assets • Impact on character and amenity • Consistency with the Local Area Strategy • Topography • Impact on existing business • Pending planning application	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H543 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

• Provision of open space	

Objections:
1. Overall level of development: • Ability of the Long Lees/Thwaites Brow area to accommodate and sustain further housing development challenged. The proposed level of growth for the area was considered to represent a significant number of homes. • Moss Carr Road cannot and should not support or sustain 142 new dwellings (combination of sites KY18/H and KY19/H). • Further housing was not needed. Proposed quantity of dwellings was not considered viable. • No justification for the overall proposed housing numbers to warrant the release of land from the Green Belt to accommodate or evidence of local demand. • Long Lee and Thwaites Brow was considered to already have a wide mix of older and newer housing, including affordable housing. Building 103 new houses on a quiet lane would be wrong.
2. Location of development: • There was a large quantity of brownfield land in Keighley with good access to facilities and services. As such, it did not make sense to development green fields in the Long Lee area, including the proposed site.
3. Site access: • Moss Car Road is narrow, in particular at the point where the proposed site access is located, as well as very busy. • On-street parking has narrowed the road, meaning that only one vehicle can pass along it at a time. It also lacks footpaths. These issues mean vehicles need to proceed with caution. • Further development on this road would increase traffic and create unacceptable levels of congestion. • Queried where new and existing residents would be able to park and whether the road could handle additional vehicles. Concerns were expressed regarding the ability of residents to park close to or outside properties and the potential implications for insurance cost if unable to do so. • 103 dwellings considered to be too much for a cul-de-sac like Moss Carr Road to accommodate. It is unsuitable and not safe enough to provide access to a major development.

- The condition of road surface had deteriorated over recent years, whilst the road is prone to drainage and flooding issues.
- Traffic safety needed to be addressed.
- Roads where highlighted as being an issue in the refusal of a previous development proposal.
- Previous development on Moss Carr Road had resulted in chaos and damage to the road surface, whilst in winter it was not gritted.

4. Impact on the highway network:

- Road network surrounding the site (Park Lane and Thwaites Brow Road) was considered to be unsuitable for heavy traffic. The latter was noted as being narrow, steep and cobbled with tight bends.
- Local roads were considered to be busy due to the presence of a nearby school as well as the number of residents using them to travel around. The narrow nature of the surrounding roads means they would not be suitable for heavy plant traffic needed for construction.
- The main route towards the town centre was viewed as problematic. A particular issue related to the bridges over the River Worth and under the Keighley & Worth Valley Railway at Park Lane/Coney Lane.
- The route was busy with traffic travelling between Keighley, Long Lee, Parkwood and Harden. Poor design and road layout as constraints on the width of the river bridge results in queuing traffic. The bridge could not accommodate any more traffic.
- Addressing the issue of bridge had been a requirement in previous years when new housing developments were permitted in the area. However, this had not happened despite some development taking place or being permitted. Issue would be exacerbated where further development to take place. The timescale for addressing the issue was queried.
- Site is located close the junction of Moss Carr Road, Long Lee Lane, Thwaites Brow and Calton Road, which was considered to be busy as well as dangerous with poor visibility. Additional traffic would make it become more hazardous.
- Any development must be linked to improvements to the road network.
- Traffic levels arising from the forthcoming Aldi development should be taken into account.

5. Impact on local infrastructure/services:

- Local infrastructure, services and amenities in Long Lee/Thwaites Brow were limited and did not have capacity to sustain or support additional homes and an increased population
- Plan did not include any provision for infrastructure or never taken into account in drawing it up. This issue required greater consideration together with impacts on traffic and the drainage network.

- Inadequate proposals were presented in the Plan in relation to upgrading local infrastructure to cope the with proposed extra housing and extra pressures on local services.
- The local school and GP surgery lacked capacity to accommodate more pupils and patients. GP surgery was noted as only operated three days a week due to lack of staff, whilst the primary school was not large enough and suffered parking problems, which impact on road safety.
- Area has a one shop, one public house, no post office and limited public transport (bus) services. The ability of the sewerage system to support growth was questioned.
- No clear vision to increase passenger capacity on local public transport – contravening the Government's Decarbonising Transport strategic priority.

6. Housing mix:

- Queried whether any social housing would be provided.

7. Development of greenfield/Green Belt land:

- Objection to the use greenfield land, which was felt by some to be Green Belt. Land considered to be beautiful and noted as being farmed. It should be protected rather than destroyed by development.
- Plan provided insufficient clarity on the number of the proposed sites in the area were Green Belt.
- The basis/reasoning for determining that Green Belt and agricultural land should be developed was queries. Loss of greenfield land and its would require further consideration.
- Identifying Green Belt was contrary to Government aims and objectives, as well as policy set out in the NPPF.
- Sufficient brownfield land/sites (including empty/vacant buildings and dwellings) within the District that should be maximised before considering changes to Green Belt boundaries.
- No evidence justifying exceptional circumstances for amending Green Belt boundaries put forward. All other reasonable options to meet housing needs should be considered.

8. Impact on biodiversity/wildlife:

- Site was a natural habitat that hosts a variety of birds, whilst the fields surrounding Long Lee contribute towards making it a green place to live.

9. Impact on leisure and recreation:

- Fields surrounding Long Lee provide a recreational resource for local people. Any loss would be detrimental to the community and its health and wellbeing.

10. Flood risk/drainage:

- Site highlighted as being waterlogged and boggy and suffering from poor land drainage.
- Gardens of adjacent properties on Moss Carr Road noted as experiencing flooding on a regular basis.
- Excess water flows off the nearby Crag causing flooding in the area due to the inability of the drainage network to cope. Drainage had been given as one of the reasons for the refusal of previous development proposals.
- Keighley area had experienced several flooding episodes in recent years. Potential for more flooding was increasing.
- Natural soakaways would be lost, meaning flooding issues in the area would be exacerbated.
- Surface water flooding and drainage needed to be addressed. Concern that sewage and waste water run-off would affect adjacent properties.

11. Ground conditions:

- Former mine workings present within the site and surrounding area, dating to the Victorian period, some of which have collapsed.
- Potential pollution hazards arising from the former workings.

12. Impact on designated heritage assets:

- Site located outside the Saltaire World Heritage Site (WHS) buffer zone, but within an area where tall buildings could affect its setting.
- Suggested the development would be unlikely to be of a height that would impact on the WHS's value, however it was recommended that further wording be added to the development considerations listed site pro-forma to highlight this.

13. Impact on character and amenity:

- Development in the Moss Carr Road area would impact on its character and village life.
- Impacts would include disturbance, disruption/loss of long distance views and loss of privacy/seclusion as well as impacts on the landscape and wider countryside. Property values could also be affected.
- Modern properties would not be in keeping with village feel.
- Area had declined in recent years due to it becoming overpopulated.

- Suggested that the plan be reviewed to preserve the community as well as wildlife habitats and to stop it becoming a congested suburb.
- The area was considered rural rather than urban in character, with a need to maintain its integrity instead of allowing growth.
- Moss Carr Road was used by residents for recreational purposes and to access the moors.
- Loss of green fields would erode the area's character. They should remain to protect wildlife and habitats as well as for the benefit of local people. Would be a detrimental impact on wellbeing is development were to take place.

14. Consistency with the Local Area Strategy:

- Development would be contrary to the policy aim of "*protecting and enhancing open spaces, green spaces, networks and corridors*".

15. Topography:

- Elevation of the sites in the Long Lee area and steep gradients running downhill towards the town centre and River Worth had not been taken into account.

16. Impact on existing business:

- Development would impact on the existing farming business that uses Moss Carr Lane for access.

17. Pending planning application:

- Site was subject to an outline planning application for 103 dwellings that is awaiting a decision.

18. Provision of open space:

- Council land opposite the proposed site at Moss Carr Crag was not designed under Policy CO1 as open space despite the fact that it has a notice identifying it as "Moss Carr Recreation Ground" and children play on it.
- As children play in the area, more cars would result in more accidents.

Support:

1. Pending planning application:

- Site allocation supported and was subject to a pending planning application for residential development.

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 369 ,444, 1353 ,2608, 4728, 5198, 5365, 5428, 5615, 6696, 7076, 7179, 7519, 8647, 8862, 8865, 9005, 9123, 9253, 9283, 9285, 9310, 9430, 9517, 10215, 10217, 10219, 10221, 10223, 10243, 10293, 13208, 13334, 16291, 17472, 28265, 28479, 28652, 29399, 30050

KY19/H: Moss Carr Road, Long Lee

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY19/H: Moss Carr Road, Long Lee (2)	37	37	36	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Overall level of development • Impact on the highway network • Impact on local infrastructure/services • Impact on biodiversity/wildlife • Development of greenfield/Green Belt land • Ground conditions • Flood risk/drainage • Impact on Saltaire World Heritage Site (WHS) • Impact on character and amenity • Consistency with the Local Area Strategy • Topography • Impact on existing business	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H544 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Overall level of development:**
   - Concerns over the ability of Long Lee/Thwaites Brow to accommodate and sustain for housing.
   - Considered that the Moss Carr Road area could not and should not support 142 new dwellings (including sites KY18/H & KY19/H)

- Suggest that the further housing was not needed and the proposed quantity of dwellings would be unviable.
- No evidence provided to justify the proposed housing requirements in the area to warrant the removal of Green Belt land or of local demand for them.

2. Impact on the highway network:

- Road network surrounding the site (Park Lane and Thwaites Brow Road) was considered to be unsuitable for heavy traffic. The latter was noted as being narrow, steep and cobbled with tight bends.
- Local roads were considered to be busy due to the presence of a nearby school as well as the number of residents using them to travel around. The narrow nature of the surrounding roads means they would not be suitable for heavy plant traffic needed for construction.
- The main route towards the town centre was viewed as problematic. A particular issue related to the bridges over the River Worth and under the Keighley & Worth Valley Railway at Park Lane/Coney Lane.
- The route was busy with traffic travelling between Keighley, Long Lee, Parkwood and Harden. Poor design and road layout as constraints on the width of the river bridge results in queuing traffic. The bridge could not accommodate any more traffic.
- Addressing the issue of bridge had been a requirement in previous years when new housing developments were permitted in the area. However, this had not happened despite some development taking place or being permitted. Issue would be exacerbated where further development to take place. The timescale for addressing the issue was queried.
- Site is located close the junction of Moss Carr Road, Long Lee Lane, Thwaites Brow and Calton Road, which was considered to be busy as well as dangerous with poor visibility. Additional traffic would make it become more hazardous.
- Any development must be linked to improvements to the road network.
- Traffic levels arising from the forthcoming Aldi development should be taken into account.

2. Impact on local infrastructure/services:

- Impact on local infrastructure (roads, traffic, sewerage, doctors, school) not taken into account in drawing up the Local Plan.
- Local infrastructure/amenities in Long Lee and Thwaites Brow lacking and unable to sustain further housing development.
- Local school and GP surgery lack capacity to accommodate an increase in pupils and patients.
- Area only has one shop, no post office and one public house.
- Public transport (bus) services are limited, inadequate and infrequent.

- Concerns regarding the ability of the sewage system to support growth.
- Inadequate proposals had been presented in the Plan in relation upgrading local infrastructure support proposed housing and extra pressures on services.
- No clear vision to increase passenger capacity on local public transport – contrary to Government Decarbonising Transport strategy priority of making public transport and active travel a first choice.

3. Impact on biodiversity/wildlife

- Site considered to be a natural habitat for a variety of birds.
- Concerns that it would be lost as a result of development. It should be preserved instead.

4. Development of greenfield/Green Belt land:

- Objection to the use of greenfield land, with many considering the site to be Green Belt land. Land considered to be beautiful and noted as being farmed. It should be protected rather than destroyed by development.
- Plan provided insufficient clarity on the number of the proposed sites in the area were Green Belt.
- The basis/reasoning for determining that Green Belt and agricultural land should be developed was queries.
- Would be contrary to Government aims and objectives as well as Green Belt policy set out in the NPPF.
- Also contrary to national and local policies and thinking on climate change, achieving zero carbon, impacts on wildlife and habitats, loss of views and pollution.
- Sufficient brownfield land/sites (including empty/vacant buildings and dwellings) within the District that should be maximised before considering changes to Green Belt boundaries.
- No evidence justifying exceptional circumstances for amending Green Belt boundaries put forward. All other reasonable options to meet housing needs should be considered.

5. Ground conditions:

- Site is boggy and waterlogged, with a pump used to drain excess water away. However, it is unable to cope with torrential conditions.
- Site is located in close proximity to The Crag.

6. Flood risk/drainage:

- Need to consider previous flooding events over recent years before natural soakaways are developed.
- Flooding had previously caused a landslide in Park Wood.
- New development would impact on the drainage network in the area.
- Surface water flooding and drainage needed to be addressed.
- Drainage had been given as one of the reasons for the refusal of previous development proposals.

6. Impact on Saltaire World Heritage Site (WHS):

- Site located outside the WHS buffer zone, but within an area where tall buildings could affect its setting.
- Suggested that development would be unlikely to be of a height to impact on the WHS value.
- Recommended that additional wording is added to the site pro-forma to highlight the potential issue.

7. Impact on character and amenity:

- Development would impact on residential amenity, in particular the village character that attracts residents to the area.
- Would result in disturbance, impact on longer distance views, loss of privacy/seclusion as well as impacts on the surrounding countryside and landscapes. Property values would be negatively impacted.
- Modern properties would not be in keeping with the village.
- Suggested that the plan be reviewed to preserve the community as well as wildlife habitats and to stop it becoming a congested suburb.
- The area was considered rural rather than urban in character, with a need to maintain its integrity instead of allowing growth.
- Green fields should remain to protect wildlife and habitats as well as for the benefit of local people.

8. Consistency with the Local Area Strategy:

- Development would be contrary to the policy aim of "*protecting and enhancing open spaces, green spaces, networks and corridors*".

9. Topography:

- Elevation of the sites in the Long Lee area and steep gradients running downhill towards the town centre and River Worth had not been taken into account.

10. Impact on existing business:

• Development would impact on the existing farming business that uses Moss Carr Lane for access.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 4721, 5200, 5459, 5616, 6694, 7077, 7180, 7673, 8646, 8864, 8866, 9006, 9124, 9254, 9284, 9286 ,9311 ,9431, 9518, 10216, 10218, 10220, 10222, 10224, 10244, 10294, 13209 ,13335 ,16292, 17482, 27937, 28266, 28480, 28653, 29400, 29523, 30049

KY20/HC: Redwood Close

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY20/HC: Redwood Close	10	10	9	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Impact on local infrastructure/services • Impact on the highway network • Provision of affordable/social housing • Overall level of development • Loss of open space • Impact on character • Flood risk/drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission.

Objections:

1. **Development of Green Belt/greenfield land:**
   - Site considered to be Green Belt and should not be included within the Plan.
   - Contrary to Government aims and objectives as well as Green Belt provisions set out in the NPPF.
   - Should maximise the use of suitable brownfield land before considering changes to Green Belt boundaries.
   - NPPF requires "exceptional circumstances" before changes can be made to Green Belt boundaries with inappropriate development only being allowed in "very special circumstances". Such circumstances have not been justified/demonstrated
   - Sufficient brownfield sites including abandoned available that should be used first.
   - Use should be made of unoccupied properties as a means of providing housing.

• Loss of greenfield/Green Belt sites would result in the erosion of the area's character.
2. Impact on local infrastructure/services: • Impact on local infrastructure (roads, traffic, sewerage, doctors, school) not taken into account in drawing up the Local Plan. • Local infrastructure/amenities in Long Lee and Thwaites Brow lacking and unable to sustain further housing development. • Local school and GP surgery as well as other amenities are over-subscribed with no further capacity. • Public transport (bus) services are inadequate and infrequent. • Concerns regarding the ability of the sewage system to support growth. • Inadequate proposals had been presented in the Plan in relation upgrading local infrastructure support proposed housing and extra pressures on services. • No clear vision to increase passenger capacity on local public transport – contrary to Government Decarbonising Transport strategy priority of making public transport and active travel a first choice.
3. Impact on the highway network: • Main access route to/from Long Lee/Thwaites Brow and the town centre is a key issue • Considered to be extremely busy and unable to handle existing traffic levels. • Bridge at Park Lane/Coney Lane (Low Bridge) is a key constraint to development • Site access would take the form of a long cul-de-sac, leading off a narrow set of streets in the surrounding area. • Concerns regarding visibility at junction and that traffic from the site should exit onto Long Lee Lane via Cherry Tree Rise, with the junction between experience impacts due to ongoing construction work in the area. • Surrounding road network busy during school pick up/drop off periods.
4. Provision of affordable/social housing: • Queried whether any social housing will be built as part of new developments.
5. Overall level of development: • No evidence provided to justify the proposed housing requirements to warrant the removal of Green Belt land or of local demand for them. • Considered that further development in the Thwaites Brow area was not required.

6. Loss of open space: • Allocation would represent another infill development with the resultant loss of a green space. • Green space viewed as being beneficial to the health and wellbeing of local people.
7. Impact on character: • Due to height and location of the site, development would not be in keeping with the rest of the area and impact on the landscape. • Area is rural, rather than urban in nature – vital to maintain its integrity rather allowing further growth. • Area contains green fields that need to remain to protect wildlife and natural habitats as well as for the benefit of local people.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 5203, 5503, 5617, 7079, 7182, 13210, 16293, 17483, 28267, 28654

KY21/HC: Parkwood Rise

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY21/HC: Parkwood Rise (1)	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on the highway network • Impact on local infrastructure/services • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H546 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Impact on the highway network:**
   - Development would have a serious impact on traffic accessing Keighley and the by-pass.
   - Coney Bridge is constrained, whilst Parkwood Street has a primary school. Traffic flows along the latter is managed via chicanes and experiences slow HGV accessing the businesses in the area.
   - Parkwood Street also acts as a by-pass for traffic seeking to avoid congestion in the town centre.
2. **Impact on local infrastructure/services:**
   - Area does not have any local facilities to support growth

Support:

No representations received in support.

Comment:

1. **Flood risk/drainage:**

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 5512, 28656

KY22/H: Parkwood Rise

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY22/H: Parkwood Rise (2)	4	4	1	0	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on the highway network • Site is available with a willing landowner • Flood risk/drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission.

Objections:

1. **Impact on the highway network:**
   - Development would have a serious impact on traffic in the surrounding area.
   - Parkwood area highlighted as having steep streets lined by terraced housing and a school.

Support:

No representations received in support.

Comment:

1. **Land availability:**
   - Site is available with a willing landowner.
   - Would support the Plan's strategic approach as well as that set out for Keighley
   - Will contribute to delivering the Local Area Strategy for Keighley South East including the delivery of 495 dwellings.
2. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 5526, 5703, 28658, 28698

KY23/H: The Walk

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY23/H: The Walk	3	2	2	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage • Impact on designated heritage assets • Impact on Green Infrastructure corridor	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H548) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

1. **Flood risk/drainage:**
   - Site located within Flood Zones 2 (FZ2) and 3 (FZ3), with half of it being impact by the extent of current Flood Zone 3ai (FZ3ai) as well as part impacted upon by the extent of draft Flood Zone 3b (FZ3b). Will be addressed via the SFRA process.
   - As part of pending SFRA update, no allocations should be made in the areas unless considered water compatible or essential infrastructure.
   - Development must demonstrate no increased risk to other, no loss of functional floodplain and suitable mitigation measures for use and over its lifetime.
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

2. Impact on designated heritage assets:

- Site is in proximity to two Grade II Listed Buildings (Low Bridge and adjacent mill),
- Development could harm elements which contribute to their significance.
- Reference to the proximity of these assets in the site preforma was welcomed, however the plan should be clearer. Additional wording was suggested.
- Consideration should be given to whether any buildings/structures on the site should be classified as non-designated heritage assets and retained as part of any development.

Support:

No representations received in support.

Comment:

1. Impact on Green Infrastructure corridor:

- Site is within a Green Infrastructure corridor along the River Worth.
- Expected that development would maintain and improve this corridor, including blue infrastructure in with relevant Local Plan policies.
- May present opportunities on site for blue infrastructure enhancement and delivery of riverine biodiversity net gain.

Representation IDs: 28659, 29268, 29401

KY24/H: Marriner Road/Walk

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY24/H: Marriner Road/Walk	2	1	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage • Impact on Green/Blue Infrastructure corridor	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H549) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

1. **Flood risk/drainage:**
   - Site is located within Flood Zone 3 (FZ3) and fully within Flood Zone 3ai (FZ3ai).
   - Subject the outcome of the SFRA process, it may become Flood Zone 3b (FZ3b) land. As part of pending SFRA update, no allocations should be made in the areas unless considered water compatible or essential infrastructure.
   - Development must demonstrate no increased risk to other, no loss of functional floodplain and suitable mitigation measures for use and over its lifetime.
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Support:

No representations received in support.

Comment:

1. Impact on Green/Blue Infrastructure corridor:

- Site is currently open space and within a Green/Blue Infrastructure corridor along the River Worth.
- It should be protected with opportunities taken to enhance it.
- Continuity of habitat viewed as essential to maintaining/improving the ecological condition of rivers/beck and maximising the contribution to green networks.
- Considered that any development would need to maintain and enhance this corridor and seek to improve river habitats in order to achieve Biodiversity Net Gain.

Representation IDs: 28660, 29270

KY25/H: Hainworth Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY25/H: Hainworth Road	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Housing mix • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H550 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. Development of Green Belt/greenfield land:

- Objection to the use of Green Belt/greenfield land when all other options for new housing in inner town/city areas had not been exhausted.
- Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas.
- Would be contrary to current thinking and policy on climate change, preserving the environment, nature/biodiversity/habitats, pollution, loss of views and wellbeing as well as achieving zero carbon. Should be cherished, protected and prevent sprawl.

2. Housing mix:

- Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed.
- Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows.

Support:

No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 16517, 28665

KY26/H: Hainworth Wood Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY26/H: Hainworth Wood Road	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on Ancient Woodland • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H551 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Impact on Ancient Woodland:**
   - Development would lead potentially adverse impact on area of ancient woodland, within/adjacent to the site boundary (Hainworth Wood PAWS).
   - Areas of ancient woodland should not be included within the allocation areas as it leaves them open to impacts from development.
   - Allocating the site is likely to cause damage to and/or loss of Ancient Woodland. Should not be taken forward.

Support:

No representations received in support.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).

- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 13458, 28666

KY27/H: Hainworth Lane/Halifax Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY27/H: Hainworth Lane/Halifax Road	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Housing mix • Flood risk/drainage	The site has been identified as a Housing Commitment Infill site referenced H552 in the Regulation 19 Local Plan.

Objections:

1. Development of Green Belt/greenfield land:

- Objection to the use of Green Belt/greenfield land when all other options for new housing in inner town/city areas had not been exhausted.
- Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas.
- Would be contrary to current thinking and policy on climate change, preserving the environment, nature/biodiversity/habitats, pollution, loss of views and wellbeing as well as achieving zero carbon. Should be cherished, protected and prevent sprawl.

2. Housing mix:

- Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed.
- Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows.

Support:

No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 16518, 28667

KY28/H: Staveley Way

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY28/H: Staveley Way	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Housing mix • Flood risk/drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H553) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

1. Development of Green Belt/greenfield land:

- Objection to the use of Green Belt/greenfield land when all other options for new housing in inner town/city areas had not been exhausted.
- Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas.
- Would be contrary to current thinking and policy on climate change, preserving the environment, nature/biodiversity/habitats, pollution, loss of views and wellbeing as well as achieving zero carbon. Should be cherished, protected and prevent sprawl.

2. Housing mix:

- Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed.

• Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located in Flood Zone 1 (FZ1), but within close proximity to Flood Zones 2 (FZ2) and 3 (FZ3 as well as the current Flood Zone 3ai (FZ3ai) extent. • Situation may change following updates to the SFRA, affecting the potential layout of development. • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development. • Easement strips will be required to allow for watercourse management/maintenance to be undertaken.

Representation IDs: 16519, 28669

KY29/H: Woodhouse Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY29/H: Woodhouse Road	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Housing mix • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H554 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. Development of Green Belt/greenfield land:

- Objection to the use of Green Belt/greenfield land when all other options for new housing in inner town/city areas had not been exhausted.
- Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas.
- Would be contrary to current thinking and policy on climate change, preserving the environment, nature/biodiversity/habitats, pollution, loss of views and wellbeing as well as achieving zero carbon. Should be cherished, protected and prevent sprawl.

2. Housing mix:

- Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed.

• Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 16520, 28670

KY30/H: Beck Lane/Bridge Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY30/H: Beck Lane/Bridge Street	3	2	1	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on designated heritage assets • Flood risk/drainage • Impact on Green Infrastructure corridor	This site has now been developed for employment use.

Objections:

1. Impact on designated heritage assets:

- Site located with Keighley Town Centre Conservation Area and adjacent to several Grade II Listed Buildings (Hattersley Crescent) as well as within the vicinity of several of Grade II Listed Buildings (Keighley Shared Church and Temple Street Methodist Church).
- Development could impact on elements that make a contribution to the significance of these designated heritage assets.
- Prior to allocation, an assessment should be undertaken of the site's contribution towards those elements that contribute towards the significance of the Conservation Area and Listed Buildings and the impact that its development will upon its significance

Support:

No representations received in support.

Comment:

1. Flood risk/drainage:

• The site is located in Flood Zone 1 (FZ1), but adjoins Flood Zones 2 (FZ2) and 3 (FZ3) as well as draft extent of Flood Zone 3b (FZ3b). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development. • Appropriate easement strip should be available along the length of the river bank. • Emerging SFRA may identify future risk that could affect the allocation or development layout.
2. Impact on Green Infrastructure corridor: • Site represents an opportunity to incorporate Green Infrastructure and significant improvement to blue infrastructure by opening up North Beck, using it as feature with public access.

Representation IDs: 28671, 29261, 29402

KY31/H: Cark Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY31/H: Cark Lane	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H556) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28672

KY32/H: James Street East

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY32/H: James Street East	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Housing mix • Flood risk/drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H557) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

1. Development of Green Belt/greenfield land:

- Objection to the use of Green Belt/greenfield land when all other options for new housing in inner town/city areas had not been exhausted.
- Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas.
- Would be contrary to current thinking and policy on climate change, preserving the environment, nature/biodiversity/habitats, pollution, loss of views and wellbeing as well as achieving zero carbon. Should be cherished, protected and prevent sprawl.

2. Housing mix: • Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed. • Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 16522, 28673

KY33/H: Parkwood Rise

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY33/H: Parkwood Rise	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on the highway network • Impact on local infrastructure/services • Flood risk/drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H558) is not carried forward as a preferred option and excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

1. Impact on the highway network:

- Concerns regarding the ability of the local highway network to support further development.
- Park Lane, Parkwood Street and Coney Bridge could not cope without major road and infrastructure changes. Development will mean an increase in traffic volumes.
- Parkwood Rise leads onto Park Lane, close its junction with Parkwood Street and Coney Bridge, which suffers congestion at all times of the day.

2. Impact on local infrastructure/services:

- Concerns overs strain being place on the local primary school.

Support:

No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 5537, 28674

KY34/H: Former Branshaw Special School, Nashville Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY34/H: Former Branshaw Special School, Nashville Street	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site allocation supported • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H559 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

No representations received in objection.

Support:

1. **Proposed site allocation:**
   - The proposed allocation on former Council operational site was supported

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 20755, 28675

KY35/H: Land off Golden View Drive, Thwaites

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY35/H: Land off Golden View Drive, Thwaites	21	21	20	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Impact on local infrastructure/services • Impact on the highway network • Site access • Cumulative impact of development • Provision of affordable housing • Overall level of development • Impact on character • Impact on open space/green space • Impact on biodiversity/wildlife • Flood risk/drainage • Impact on designated heritage assets	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H476) is not carried forward as a preferred option and excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

1. **Development of Green Belt land:**
   - Objection to the development of Green Belt land. Considered that it should be protected – it loss would result in erosion of the area's character.
   - Contrary to Government aims and objectives as well as Green Belt policy set in the NPPF.

- Use of brownfield land should be maximised first before considering Green Belt releases/changes to Green Belt boundaries.
- Numerous brownfield sites and vacant/unused buildings and properties within the District that could be used first. This included a large number of empty homes.
- No evidence justifying exceptional circumstances for amending Green Belt boundaries had been put forward. All other reasonable options should be examined.
- Suggested that no clear examination of alternative approach such as increasing the amount development being directed to urban brownfield sites or increases in densities to reduce the level of Green Belt requirement had taken place.
- Contrary to other national and local policies regarding achieving zero carbon, loss of identity, damage to wildlife/habitats and loss of views.

2. Impact on local infrastructure/services:

- Local infrastructure, services and amenities in Long Lee/Thwaites Brow were limited and did not have capacity to sustain additional homes.
- Plan did not include any provision for infrastructure or never taken it into account in drawing it up. This issue required greater consideration together with impacts on traffic and the drainage network.
- Inadequate proposals were presented in the Plan in relation to upgrading local infrastructure to cope the with proposed extra housing and extra pressures on local services.
- Local school, GP surgery and other amenities were over-subscribed and do not have further capacity.
- Public transport (bus) services were inadequate and infrequent, whilst there were concerns regarding the ability of the sewerage system to support growth.
- No clear vision to increase passenger capacity on local public transport – contravening the Government's Decarbonising Transport strategic priority.

3. Impact on the highway network:

- Moss Carr Road consider unsuitable to support further development. It was constrained by its width, on-street parking and poor surfacing.
- Development would increase traffic and cause congestion. Level of traffic using Thwaites Brow Road and "The Twines" should also increase, which in turn would lead to more air pollution.

- Main access route to/from Long Lee/Thwaites Brow and the town centre considered to extremely busy and unable to handle existing traffic levels.
- Bridge at Park Lane/Coney Lane (Low Bridge) was a key constraint. It was unable to cope with existing traffic levels as well as that arising from future development. The amount of traffic it could was queried.
- Was previously a requirement that development in Long Lee had to address the issue of the bridge. Queried whether this remained part of the plan.

4. Site access:

- Site access considered to be difficult. Golden View Drive and the adjacent roads could not support any increase in the amount of vehicles including construction traffic.
- Golden View Drive is narrow and constrained by on-street parking. It is also an un-adopted road with no pavements and is in private ownership.
- Owners are responsible for its maintenance and upkeep. Queried who would be responsible for this in future were development to take place.
- Junction of Golden View Drive and Thwaites Brow Road considered to be unsuitable for the amount of traffic that would be created. It was also hazardous due to parked cars and poor visibility to traffic on Thwaites Brow Road. Changes to the junction would be needed.
- Thwaites Brow Road acts a short-cut to/from the A650 bypassing the town centre.

5. Cumulative impact of development:

- Proposed site could not be considered in isolation without assessing the impact that it would have on the land surrounding it.
- Concerns that it would become a gateway site, allowing further access to the green fields in its vicinity.
- Area had already experience development creep on a piece by piece basis, despite Green Belt being designed to stop sprawl. Local Plan and its impact assessments have not addressed this issue.
- Site would join up with proposed site KY18/H, partially surrounding the cricket ground, removing an area of green space and allowing urban sprawl to expand down the valley side.
- Would have a negative impact on Public Rights of Way towards Bingley.

6. Provision of affordable housing:

- Questioned whether the proposed housing would be affordable.
- Suggested that new homes would be purchased by landlords for rental. Would not relieve the housing crisis.

7. Overall level of development:

- No evidence provided to justify the proposed housing requirement that warrants the removal of Green Belt land or the local demand for new housing.
- Further development in Thwaites Brow not required.

8. Impact on character:

- The area was considered rural rather than urban in character, with a need to maintain its integrity instead of allowing growth.
- Area contains green fields that should remain to protect wildlife and habitats as well as for the benefit of local people.
- Would be impacts on the landscape and longer distance views.

9. Impact on open space/green space:

- Green spaces considered to be beneficial to health and wellbeing of local people.
- Development wold remove this and reduce the appeal of the area.

10. Impact on biodiversity/wildlife:

- Concerns about the effect on wildlife and loss of habitats.

11. Flood risk/drainage:

- Site prone to waterlogging during periods of heavy rain with surface water running down streams.

11. Impact on designated heritage assets:

- Site located outside the Saltaire World Heritage Site (WHS) buffer zone, but within an area where tall buildings could affect its setting.
- Suggested that development would be unlikely to be of a height to impact on the WHS value.
- Recommended that additional wording be added to the site pro-forma to highlight the potential issue.

Support:

No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 367, 1608, 3140, 5205, 5545, 5549, 5621, 7080, 7183, 8160, 8490, 9519, 10629, 10934, 13211 ,16294, 17484, 28268, 28676, 29403, 29522

KY36/H: Long Lee Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY36/H: Long Lee Lane	19	15	12	2	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Overall level of development • Development of Green Belt land • Impact on local infrastructure/services • Housing mix • Flood risk/drainage • Impact on the highway network • Site access • Impact on character • Loss of open space/green space • Impact on designated heritage assets • The proposed allocation is supported, however the reduced site area and number of dwellings were considered unrealistic. • Green Belt assessment	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H560 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Overall level of development:**
   - Ability of the Long Lee/Thwaites Brow are to accommodate and sustain further growth was raised.
   - Suggested that further housing was not needed.

- Site considered to be unsuitable as the wider area was already well developed with some developments in progress as well as other land earmarked for housing.
- No justification available for the overall housing numbers in the area to warrant the removal of land from Green Belt to accommodate them.
- Area had been subject to “urban creep” from Keighley over a number of years, resulting in separate villages become part of the larger urban area.

2. Development of Green Belt land:

- Objection to the development of Green Belt land.
- Contrary to Government aims and objectives as well as Green Belt policy set in the NPPF.
- Use of brownfield land should be maximised first before considering Green Belt releases/changes to Green Belt boundaries.
- Numerous brownfield sites and vacant/unused buildings and properties within the District that could be used first. This included a large number of empty homes.
- No evidence justifying exceptional circumstances for amending Green Belt boundaries had been put forward. All other reasonable options should be examined.
- Suggested that no clear examination of alternative approach such as increasing the amount development being directed to urban brownfield sites or increases in densities to reduce the level of Green Belt requirement had taken place.
- Contrary to other national and local policies regarding achieving zero carbon, loss of identity, damage to wildlife/habitats and loss of views.

3. Impact on local infrastructure/services:

- Local infrastructure, services and amenities in Long Lee/Thwaites Brow were limited and did not have capacity to sustain additional homes.
- Plan did not include any provision for infrastructure or never taken it into account in drawing it up. This issue required greater consideration together with impacts on traffic and the drainage network.
- Inadequate proposals were presented in the Plan in relation to upgrading local infrastructure to cope the with proposed extra housing and extra pressures on local services.
- Local school and GP surgery lack capacity to accommodate an increase in the number of pupils and residents.

• Public transport (bus) services were inadequate and infrequent, whilst there were concerns regarding the ability of the sewerage system to support growth. • No clear vision to increase passenger capacity on local public transport – contravening the Government's Decarbonising Transport strategic priority.
4. Housing mix: • Queried what level of social housing would be provided.
5. Flood risk/drainage: • Site suffers from flooding. • Development would increase surface water run-off • Proximity to the Crag has resulted in excess water running through it.
6. Impact on the highway network: • Main access route to/from Long Lee/Thwaites Brow and the town centre considered to extremely busy with the bridge at Coney Lane unable to cope with increased traffic levels. • Would increase the level of traffic using Harden Road and Long Lee Lane.
7. Site access: • Site access was difficult due its location immediately adjacent to the junction of Harden Road and Long Lee Lane. Road forms the main route between Keighley and several neighbouring villages. • Adjacent properties already experience issues with visibility and egress.
6. Impact on character: • The area was considered rural rather than urban in character, with a need to maintain its integrity instead of allowing growth. • Area contains green fields that should remain to protect wildlife and habitats as well as for the benefit of local people. • Would be impacts on the landscape and longer distance views.
7. Loss of open space/green space: • Green space on both sides of Long Lee Lane would be lost should the site together with one opposite be developed.

8. Impact on designated heritage assets: • Site located outside the Saltaire World Heritage Site (WHS) buffer zone, but within an area where tall buildings could affect its setting. • Suggested that development would be unlikely to be of a height to impact on the WHS value. • Recommended that additional wording be added to the site pro-forma to highlight the potential issue.
Support:
1. Site allocation: • The proposed allocation was supported, however the reduced site area and number of dwelling were considered unrealistic.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.
2. Proposed site allocation area: • Site area should be extended to encompass the full extent of that set out in the SHLAA (2015) covering an area of 0.64ha. • Would allow for the provision of 24 dwellings (density of 37.5 dwellings per hectare). • Would support the delivery of more affordable homes as well as providing greater benefits.
3. Green Belt assessment: • Conclusion that the site makes a low contribution to the five Green Belt purposes was supported. • Green Belt enhancement such as planting could take place beyond the wider site area would be achievable.

Representation IDs: 1667, 5206, 5553, 5622, 6865, 7081, 7185, 8161, 16295, 17485, 18277, 28269, 28677, 29404, 29868, 29871, 29885, 29887, 29890

KY37/HC: Former Ingrow Corn Mill

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY37/HC: Former Ingrow Corn Mill	2	2	0	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • The proposed allocation is supported • Flood risk/drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H561) is not carried forward as a preferred option and excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:

No representations received in objection.

Support:

1. **Proposed site allocation**:
   - The proposed allocation was supported.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 20756, 28678

KY38/H: Worthville Farm, Dawson Avenue

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY38/H: Worthville Farm, Dawson Avenue	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H562) is not carried forward as a preferred option and excluded. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA).

Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28680

KY39/H: Bradford Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY39/H: Bradford Road	3	3	1	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proximity of designated heritage asset • Site location • Flood risk/drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H493) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

1. **Proximity of designated heritage asset:**
   - Site is located 150m east of a Grade II Listed Building (Eastwood House in Victoria Park).
   - Development could harm elements that contribute to the significance of this designated heritage asset.
   - Reference in the site pro-forma to the proximity of this asset as a potential constraint was welcomed. However, wording should be more positive. Alternative wording was suggested.
   - Pro-forma incorrectly referenced Victoria Park as being the designated heritage asset – this should be corrected.

Support:

No representations received in support.

Comment:

1. **Site location:**

• The site is located in the Keighley East electoral ward rather than Keighley Central. Plan should be amended reflect this.
2. Flood risk/drainage: • The site is partly located with Flood Zone 2 (FZ2). • Development should follow a sequential approach to prevent un-necessary development in FZ2 • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28555, 28681, 29405

KY40/H: The Bungalow, Harden Road, Long Lee

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY40/H: The Bungalow, Harden Road, Long Lee	13	13	12	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Impact on local infrastructure/services • Impact on the highway network • Site access • Overall level of development • Housing mix • Impact on character • Loss of open space/green space • Impact on biodiversity/wildlife • Flood risk/drainage • Impact on designation heritage assets	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H540 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Development of Green Belt land:**
   - Objection to the development of Green Belt land. It should be protected, whilst its loss would result in the erosion of the area's character.
   - Contrary to Government aims and objectives as well as Green Belt policy set in the NPPF.
   - Use of brownfield land should be maximised first before considering Green Belt releases/changes to Green Belt boundaries.

- Numerous brownfield sites and vacant/unused buildings and properties within the District that could be used first. This included a large number of empty homes.
- No evidence justifying exceptional circumstances for amending Green Belt boundaries had been put forward. All other reasonable options should be examined.
- Suggested that no clear examination of alternative approach such as increasing the amount development being directed to urban brownfield sites or increases in densities to reduce the level of Green Belt requirement had taken place.
- Contrary to other national and local policies regarding achieving zero carbon, loss of identity, damage to wildlife/habitats and loss of views.

2. Impact on local infrastructure/services:

- Local infrastructure/services in Long Lee/Thwaites Brow unable to sustain further housing development.
- Local school and GP surgery (as well as other amenities) are over-subscribed and do not have further capacity, whilst public transport (bus) services are inadequate and infrequent
- Concerns over ability of sewerage system to support growth.
- Impact on local infrastructure (roads, traffic, sewerage, doctors, school) not taken into account in drawing up the Local Plan.
- Inadequate proposals presented in respect of upgrading local infrastructure to cope with proposed housing and extra pressures on services.
- Lack of clear vision to increase passenger capacity of local public transport, contravening Government's Decarbonising Transport Strategic priority.

3. Impact on the highway network:

- Main access route to/from Long Lee/Thwaites Brow and the town centre considered to extremely busy with the bridge at Coney Lane unable to cope with current traffic levels as well as that arising from development in the area.
- The level of traffic the River Worth bridge could accommodate was queried.
- Options for altering the existing from layout at the bridges was restricted to their position.
- Was previously a requirement that development in Long Lee had to address the issue of the bridge. Queried whether this remained part of the plan.
- Plan makes no provision for upgrading the road network in the area.

- Site located close to busy junction on well-used route between Keighley and Harden – if developed (together with KY36/H), residents would need exercise extreme caution using the junction.

4. Site access:

- Site located close to busy junction on well-used route between Keighley and Harden – if developed (together with KY36/H), residents would need exercise extreme caution using the junction.

5. Overall level of development:

- Site was an example of “urban creep” within the Long Lee area. Together with proposed site KY36/H it would represent a “pincer movement” encompassing the area via infill development.
- Site forms part of a larger area that could be encroached upon.
- No evidence provided to justify the proposed housing requirements to warrant the removal of Green Belt land or local demand for them.
- Further development in Thwaites Brow area was not required.

6. Housing mix:

- Queried whether any social housing will be built as part of new developments.
- Suggested that new housing will be bought by landlords for rental, not relieving the housing crisis.

9. Impact on character:

- The area was considered rural rather than urban in character, with a need to maintain its integrity instead of allowing growth.
- Area contains green fields that should remain to protect wildlife and habitats as well as for the benefit of local people.
- Would be impacts on the landscape and longer distance views.

10. Loss of open space/green space:

- Green space viewed as beneficial to the health and wellbeing of local people.
- Development would remove this and reduce the appeal of the area.

11. Impact on biodiversity/wildlife:

- Concern about the effect on wildlife and loss of habitats.

12. Flood risk/drainage: • Site prone to waterlogging during periods of heavy rain with surface water running down streams.
12. Impact on designation heritage assets: • Site located outside the boundary of the Saltaire World Heritage Site (WHS) boundary, but within an area where tall buildings could affect its setting. • Suggested that development would be unlikely to be of a height that would impact on the WHS's value. • Recommended that wording be added to the development considerations within the site proforma to highlight this issue.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 5207, 5559, 5625, 7082, 7187, 8162, 13212, 16296, 17486, 28270, 28682, 29406, 29524

KY42/HC: Land off Ryan Grove, Braithwaite

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY42/HC: Land off Ryan Grove, Braithwaite	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Ground conditions • Proximity to a designated heritage asset • Impact on the highway network • Flood risk/drainage	This site received planning permission and is now fully developed.

Objections:

1. **Ground conditions:**
   - Site is steeply graded and contains a natural spring in its centre.
2. **Proximity to a designated heritage asset:**
   - Site located within close proximity to Braithwaite Conservation Area.
3. **Impact on the highway network:**
   - Would increase traffic in Laycock, creating more pollution and raised the risk of increase road traffic accidents.
   - Speeding is an issue and would need traffic calming measures to address it, affecting the aesthetics of Laycock.

Support:

No representations received in support.

Comment:

1. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 1103, 28683

KY43/H: Grange Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY43/H: Grange Street	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H565 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28684

KY44/H: Parson Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY44/H: Parson Street	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on designated heritage asset • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H566 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Impact on designated heritage asset:**
   - Site is located 100m south of a Grade II Listed Building (Eastwood House in Victoria Park).
   - Development could harm elements that contribute to the significance of this designated heritage asset.
   - Proforma incorrectly referenced Victoria Park as being the designated heritage asset – this should be corrected.

Support:

No representations received in support.

Comment:

1. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28685, 29407

KY45/HC: Former Mortuary, Skipton Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY45/HC: Former Mortuary, Skipton Road	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	This site is now fully developed.

Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28686

KY46/H: Land at Woodville Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY46/H: Land at Woodville Road	2	2	1	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on designated heritage asset • Flood risk/drainage	This site is under construction.

Objections:

1. Impact on designated heritage asset:

- Site located with the Devonshire Park and Cliffe Castle Conservation Area, which is on the Heritage at Risk list.
- Development could harm elements that contribute to the significance of the Conservation Area.
- Prior to allocation an assessment of should be undertaken of the site's contribution towards those elements that contribute towards the significance of the Conservation Area and the impact that its development will upon its significance.

Support:

No representations received in support.

Comment:

2. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be equired within any future development.

Representation IDs: 28687, 29408

KY47/H: Former site of Sandbeds Methodist Church, Swine Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY47H: Former site of Sandbeds Methodist Church, Swine Lane	1	1	0	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage	This site is fully developed.

Objections:
No representations received in objection.
Support:
No representations received in support.
Comment:
1. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 28688

KY49/E: Beechcliffe

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY49/E: Beechcliffe	6	5	2	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage • Impact on biodiversity/wildlife • Impact on the highway network • Impact on designated heritage assets • The proposed allocation is supported. The owner confirmed it is available for development. • Site allocation should take account of the development potential of the northern section of the site. • Proximity to South Pennines SPA & SSSI • Impact on water quality	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains an employment allocation and is identified as E118 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Flood risk/drainage: • Flooding considered to be particular issue in relation to the site.
2. Impact on biodiversity/wildlife: • Site contains mature trees and natural habitats that provide a shelter for a range species from the bypass and other industrial units in the area.

3. Impact on the highway network:

- Would increase traffic levels using the road network and cause more pollution for residents and the nearby school

4. Impact on designated heritage assets:

- Site located close of several designated heritage assets – Utley Cemetery (Grade II Registered Park & Garden), Devonshire Park & Cliffe Gardens Conservation Area, and Low Utley Conservation Area.
- Development could harm elements that contribute to the significance of these assets.
- Prior to allocation an assessment of should be undertaken of the site's contribution towards those elements that contribute towards the significance of these assets and the impact that its development will upon their significance.

Support:

1. Site allocation:

- The proposed allocation was supported. The owner is keen to develop it and is confirmed as available.

Comment:

1. Site allocation area:

- Noted that the site assessment suggests that the southern section of the site is primarily identified for employment.
- Much of the site is developed already and presents an opportunity for a wider redevelopment to modernise the existing premises.
- Site allocation should take account of the development potential of the northern section of the site.

2. Proximity to South Pennines SPA & SSSI:

- Site within the Impact Risk Zone (IRZ) for the South Pennine Moors SAC/SPA (Phase 2) and SSSI, and West Nidderdale, Barden and Blubberhouses Moor SSSI.
- Depending on the scale and nature of employment development proposed, consultation may be required with Natural England as part of any future planning application to ensure no adverse effects on the SPA/SAC/SSSIs.
- Site has potential for significant green and blue infrastructure improvements and opportunities for biodiversity net gain.

3. Impact on water quality:

• Concerns expressed regarding potential impacts on the nearby waterbody/stream and wider water quality from run-off and other pollutants.
4. Flood risk/drainage: • Parts of the site located within Flood Zones 2 (FZ2), 3 (FZ3) and the current/draft 3b/3a(i) (FZ3b/FZ3a(i). • Between one third and one half is impacted by FZ2, whilst one third is impacted by the 2019 draft FZ3b extent. The latter is caused by flood water under the main road between the site and river. • No development should take place in the FZ3b/FZ3a(i) extent unless water compatible or essential infrastructure. • Development should follow a sequential layout to prevent un-necessary development within FZ3b, FZ3 and FZ2. • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development. • Easement strips should be included allow maintenance/management of the adjacent watercourse.

Representation IDs: 1368, 7506, 7514, 19920, 28633, 29392

KY50/E: Bradford Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
KY50/E: Bradford Road	4	4	2	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Housing mix • Flood risk/drainage • Loss of green space • Impact on biodiversity/wildlife • Proximity to SAC Lamprey migration route	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains an employment allocation and is identified as E119 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. Development of Green Belt/greenfield land:

- Objection to development on Green Belt/greenfield land when all other options for all options for new housing in inner town/city areas had not been exhausted. The Plan should explore these brownfield options first.
- Keighley town centre highlighted as having a number of empty buildings that could be converted to residential use. There are also other derelict areas that could be development first before encroaching onto fields or building in more desirable areas.
- Would be contrary to current thinking and policy on climate change, preserving the environment, nature and wellbeing. Government policy is to protect Green Belt land to prevent urban sprawl

2. Housing mix:

- Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed.

• Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows
3. Flood risk/drainage: • Located very close to a flood plain.
4. Loss of green space: • Site constitutes a valuable greenfield space separating the hotel, bypass and businesses in the area.
5. Impact on biodiversity/wildlife: • Barn owls and deer are present in the area. Development would destroy a vital wildlife corridor.
Support:
No representations received in support.
Comment:
1. Proximity to SAC Lamprey migration route: • The site is within 140m of a Humber Estuary SAC Lamprey migration route. • Any works to the river banks or within the river channel should be subject to a Habitat Regulations Assessment to consider the impact on the Lamprey.
2. Flood risk/drainage: • The site is located within Flood Zone 1 (FZ1), but adjoins Flood Zones 2 and 3 (FZ2 & FZ3) as well as draft Flood Zone 3b (FZ3b) • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 1365, 16521, 19921, 28634

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 111 within the consultation document.

Summary of Consultation

A total of **27** representations were received in relation to Question 111 from **21** respondents. Respondents included Highways England, local residents, landowners/developers (and their agents), Keighley Town Council and a Ward Councillor. Many of these representations related to sites that had not been included with the Preferred Options of the Local Plan (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in.

Table 0.5: Consultation Question Q111: Keighley Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q111	28	22	25	1	2

Table 0.6: Consultation Question 111: Keighley Preferred Site Allocations - Summary of Representations Received

Consultation Question 111 – Keighley Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Development in the Thwaites Brow/Long Lee area regarding concerns of access via a single main road (Park Lane) and the requirements for replacement bridge to cross the River Worth. • Objections to the development of Green Belt land when there are alternative Brownfield sites available. • Overall level and distribution of development. • Impact on biodiversity/wildlife	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

• Impact on local infrastructure/services • Global pressures • Housing mix • Non-inclusion of sites/amendments to site allocation boundaries - Hollins Lane (SHLAA Ref: KY/002) - Hollins Lane (LP Ref: KY1/H; SHLAA Ref: KY/003) - Banks Lane, Riddlesden (SHLAA Ref: KY/039) - Bradford Road, Riddlesden (SHLAA Ref: KY/044) - Land at Harewood Rise, Bracken Bank (SHLAA Ref: KY/108) - Land adjacent to Harewood Hills Farm, Goose Cote Lane (SHLAA Ref: KY/109) - Long Lee Lane (SHLAA Ref: KY/151) - Land at Cackleshaw Farm, Sykes Lane (SHLAA Ref: OA/011) - Land north of Shann Lane (New Site) - Ilkley Road, Riddlesden (Barley Cote Farm, Ilkley Road, Riddesden & Barley Cote Road (Part) (SHLAA Refs: KY/040, KY/041& KY/042 [part])/Land North of Mayhall Avenue & Southfield Drive, Riddlesden (New Site) - Long Lee Lane (LP Ref: KY36/H; SHLAA Ref: KY/134) • Proposed sites off Occupation Lane are supported if development includes required upgrades to currently unadopted road. • Impact on the highway network • Additional/Alternative site - Land at Goose Cote (SHLAA Ref: KY/105)	

Summary of Representations
Objections
1. Development in the Thwaites Brow/Long Lee area: • Concerns that access to area consists of single main road and the ability of Coney Lane bridge to accommodate further traffic. The bridge could not be changed due the proximity of the railway bridge. • The bridge should be replaced, paid for by developers. • Second access (The Twines) viewed as being less appropriate. Would be used as a rat-run to reach the bypass • Development will place strain on local infrastructure/amenities. • Will affect the character of area, cause overcrowding and increase crime rates. • Highway network considered to be too narrow. More traffic would make unsafe. • Would result in the loss of green space • Access to proposed Golden View Drive site (KY35/H) is narrow with on-street parking and is un-adopted. • Were better places to build houses with good access than Long Lee.
2. Development on Green Belt land: • Objections to the development of Green Belt land. Would result in the loss of greenfield land and as such should be protected in order to prevent sprawl. • Contrary to Government policy as well as current thinking on climate change, preserving the environment, nature and wellbeing. • All options for new housing in inner town/city areas should be exhausted first with the Plan being changed to explore all brownfield options. • District has a plentiful supply of brownfield sites that had not been developed. • Keighley, including the town centre, highlighted as having a large number of empty buildings that could be used instead of greenfield/Green Belt sites, including through conversion. Unused properties on North Street should be compulsory purchased for use as brownfield sites. • Derelict areas on the outskirts of settlement were suggested a potential option.

Summary of Representations
• Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed and sites deleted from the plan.
3. Overall level and distribution of development: • The proposed level of development for Keighley was accepted. • 31 of the 44 site proposed were located on greenfield or Green Belt land, contrary to the Plan's commitment to brownfield sites first. • Reasoning for the inclusion Green Belt was recognised, however they should be removed from the Plan. • Did not seem to be a larger number of sites proposed in Bradford City Centre, with the Keighley and Ilkley areas absorbing the brunt of the growth for the District.
4. Impact on biodiversity/wildlife: • Development would not add to the area's biodiversity, but detract from it.
5. Impact on local infrastructure/services: • Local infrastructure in Keighley cannot cope with further housing development • Transport, schools and GP surgeries highlighted as being over-subscribed.
6. Global pressures: • Concern regarding overall global population growth and the pressures that it will place upon the planet as well as the need for more housing.
7. Housing mix: • Concerns that new housing will 3 or 4 bed executive homes. Queried wither Keighley needed the housing proposed. • Queried whether thought had been given to the housing needs of older people. Suggested that consideration should be given to building more sheltered/warden managed housing and bungalows
8. Non-inclusion of sites/amendments to site allocation boundaries: • Several respondents objected to the non-inclusion of several sites and/or suggested amendments to site boundaries, including:

Summary of Representations
a. Hollins Lane (SHLAA Ref: KY/002): • Need to identify additional sites to accommodate the requirement for 2,300 dwellings per year – incorporating the 35% urban uplift. Justified to include an uplift in Keighley's requirement. • Account has not been taken of potential to reduce the site's developable area to address heritage constraints • No landscape evidence has been provided and highways evidence has not been considered. • Conclusions of the Green Belt Assessment are disagreed with – the extension of the settlement boundary would for a logical boundary and rounding off the area. • Reduction of the developable area to mitigate heritage impacts will enable inclusion of substantial open space in the SE third of the site which also provides an opportunity for significant habitat creation and enhancement to biodiversity. • Site is located in close proximity to a number of services and facilities. It has no ownership constraints and deliverable with no viability issues.
b. Hollins Lane (LP Ref: KY1/H; SHLAA Ref: KY/003): • Full extent of the site should be included • It was considered that the Local Plan needs to identify additional sites to accommodate the requirement for 2,300 dwellings per year. • Most of the site is within the urban area and safeguarding in the RUDP. It has not been shown as rejected within the Strategic Land Assessment and is therefore considered to logical add the remainder of the site as deliverable within the Plan. • SA for the site would be similar to that for proposed allocation KY1/H • Heritage issues can be addressed via appropriate design and retention of openness. • Constitutes a logical inclusion as a housing allocation, as it is well-served and well-located in the north west of the Keighley urban area. • Would include a minor Green Belt deletion, to allow the creation of a logical urban edge to this part of the Keighley urban area and stronger more durable Green Belt boundary.
c. Banks Lane, Riddlesden (SHLAA Ref: KY/039):

Summary of Representations
• Considered suitable for residential development due to its road frontage and south-facing orientation • Abuts residential development on three sides.
d. Bradford Road, Riddlesden (SHLAA Ref: KY/044): • Proposal for development relates to only the section of the site within Flood Zone 1, covering 1.5ha. • Previous history of development being acceptable on part of the site, whilst there is residential development to the east and west. • Part of the Green Belt assessment is challenged – should be “Low” for purposes1 to rather than “moderate” or “major”. • A new boundary could be using those of the adjacent sites, with further tree planting. • Well located for public transport services. Can be delivered now. • Will assist in reducing the shortfall in the district’s five-year housing land supply.
e. Land at Harewood Rise, Bracken Bank (SHLAA Ref: KY/108): • Housing requirement for Keighley should be increased - the site would provide an opportunity to meet this need.
f. Land adjacent to Harewood Hills Farm, Goose Cote Lane (SHLAA Ref: KY/109) – • Housing requirement for Keighley should be increased - the site would provide an opportunity to meet this need**.**
g. Long Lee Lane (SHLAA Ref: KY/151): • Site will help to deliver Bradford District’s increased housing requirement under the revised standard methodology. • Will not involve the release of Green Belt land. • Access is feasible and topography/landscape concerns/impacts could be overcome. • Site is available and deliverable.
h. Land at Cackleshaw Farm, Sykes Lane (SHLAA Ref: OA/011): • Considered that the housing requirement for Keighley should be increased - the site would provide an opportunity to meet this need.

Summary of Representations
i. Land north of Shann Lane (New Site): • Housing requirement for Keighley should be increased – the site would provide an opportunity to meet this need.
j. Ilkley Road, Riddlesden (Barley Cote Farm, Ilkley Road, Riddesden & Barley Cote Road (Part) (SHLAA Refs: KY/040, KY/041& KY/042 [part])/Land North of Mayhall Avenue & Southfield Drive, Riddlesden (New Site): • Amendment to the north boundaries of SHLAA sites KY/040 and KY/041 to follow Public Right of Way (PROW 18) that runs through both sites from west to east, • Inclusion of additional area of land between the southern boundaries of sites KY/040 and KY/040 and the existing built up area (north of Mayhall Avenue and Southfield Drive). • New eastern boundary is formed by How Beck, whilst part of site KY/042 is included at the western edge. • Revised site offers new clear and defensible boundaries and is more visually contained in landscape terms. It would achieve a moderate rating against Green Belt purposes 2, 3 and 4 and can be access from several points. It is considered to be deliverable.
k. Long Lee Lane (LP Ref: KY36/H; SHLAA Ref: KY/134): • Proposed allocation was welcomed; however, it was felt that the site boundary should be extend southwards to match the rear gardens of adjacent properties to give an area of 0.64ha. • Would enable the delivery of more affordable housing and preferable to the release of other small sites
Support
1. Proposed sites off Occupation Lane • Road is an un-adopted highway. • Should sites KY7/H & KY8/H be developed, developer should be required to pay for its upgrade to adoptable standards • Would be advantageous to residents and road uses. Extra vehicles would be outweighed by having a good road.
Comments
1. Impact on the highway network:

Summary of Representations
• Development in Keighley would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
2. Additional/Alternative site: • **Land at Goose Cote (SHLAA Ref: KY/105):**   • Considered to be highly sustainable, suitable and immediately available   • Will meet some of the District's housing requirement over the plan period.   • Will help to address the planned distribution of housing and help to demonstrate a robust housing supply to meet targets.   • Will provide a range of housing types/sizes to meet identified long term needs in the local area.

Representation IDs: 365, 477, 4229, 4475, 5102, 5753, 5777, 6149, 6917, 7400, 10858, 11002, 11383, 11384, 11385, 15500, 16286, 16505, 28552, 29437, 29441, 29500, 29538, 29547, 29549, 29867, 29886, 30128

2.82 SILSDEN

Introduction

The Local Plan settlement hierarchy identifies Silsden as a Local Growth Centre. It is considered to be one of the most sustainable locations and is accessible to higher order settlements. As such it will help make a significant contribution of the meeting the District's housing needs, employment and providing supporting community facilities. Based on this it is proposed that the settlement has a housing target of 700 dwellings. A total of eight site allocations (all residential) were proposed to deliver these development requirements.

Portrait & Local Area Strategy

The Local Plan provides a portrait of the Silsden's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as question 112 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **46** representations were received in relation to the Silsden Portrait and Local Area Strategy (Question 114) from **31** respondents. Respondents included a Government agency/body (Highways England), local residents, a Town/Parish Council and a Ward Councillor.

Consultation Question 112 - Silsden Portrait & Local Area Strategy

(below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Overall level of development • Settlement hierarchy • Impact on local infrastructure/services • Impact on the highway network • Impact on transport network/services • Impact on Green Infrastructure (GI)/environment	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy SI1: Silsden, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Local Area Strategy mapping • Provision of open space • Provision of employment • Provision of retail and local services • Housing mix and tenure • Housing density • Support for Silsden Portrait/Local Area Strategy • Impact on character • Impact on biodiversity/wildlife • Impact on landscape • Impact on air quality • Development of greenfield land • Settlement boundary should be redrawn due to lack of funding for the bypass. • Provision of sporting/leisure facilities • Population figures quoted in the portrait was queried • Distance between Silsden, Steeton and the River Aire quoted in the portrait was queried • Flexibility should be built into the Plan to respond to changes • Neighbourhood Plan should be reviewed	

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Table 0.1: Consultation Question 112: Silsden Portrait & Local Area Strategy - Overview of Representations Received

Consultation Question 112 - Silsden Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
112	Silsden Portrait & Local Area Strategy	46	31	23	2	22
	Totals	**46**	**31**	**22**	**2**	**22**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Overall level of development • Settlement hierarchy • Impact on local infrastructure/services • Impact on the highway network • Impact on transport network/services • Impact on Green Infrastructure (GI)/environment • Local Area Strategy mapping • Provision of open space • Provision of employment • Provision of retail and local services • Housing mix and tenure • Housing density • Support for Silsden Portrait/Local Area Strategy • Impact on character • Impact on biodiversity/wildlife • Impact on landscape • Impact on air quality • Development of greenfield land	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy SI1: Silsden, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Settlement boundary should be redrawn due to lack of funding for the bypass. • Provision of sporting/leisure facilities • Population figures quoted in the portrait was queried • Distance between Silsden, Steeton and the River Aire quoted in the portrait was queried • Flexibility should be built into the Plan to respond to changes • Neighbourhood Plan should be reviewed	

Summary of Representations
Objections
1. Overall level of development: • Further growth would impact on the character of Silsden, whilst there were objections to development on greenfield/Green Belt land. • Silsden would become overcrowded, exacerbating the loss its village character. • Proposed housing requirement considered disproportionate to the settlement's population, level of amenity and infrastructure, as well as in comparison to other areas. • Despite the reduce requirement, Silsden was still bearing the brunt of plan's housing requirement as it is surrounded by easily developable green fields rather than meeting local needs. • 880 dwellings represented 37.6% of the Keighley constituency requirement. Would mean 1,500 plus more cars added to the road network. • Brownfield land should be prioritised. Plan did not include details in relation to how brownfield sites would be brought forward for housing. Such opportunities were present in Silsden without the need to destroy greenfield land. • Plan for Silsden contrary to Government policy/objectives to prevent urban sprawl and maximise brownfield site development. • Existing planning permissions should be deducted from the overall housing requirement.
2. Settlement hierarchy: • Local Growth Centre designated questioned. • Had not been justified by evidence.
3. Impact on local infrastructure/services:

Summary of Representations
• Concerns regarding the ability and availability of infrastructure/services to support and/or cope with existing and future growth. • Development should not be considered until infrastructure issues are addressed. The town's transport links and infrastructure capacity had been misunderstood. • Silsden had seen a lack on investment in infrastructure. Queried whether increased housing would lead to proportionate increase in infrastructure investment. • Delivery of new/enhanced infrastructure to address existing issues essential including in relation to the utilities networks, highways and railway station access. • Education infrastructure would not cope with further development and the demand for places created, including at the new primary schools. • New school in the wrong location. Will exacerbate traffic issues and is within a residential area distant from the most populated areas of the town. • South Craven Schools (secondary school) noted as having capacity for additional pupils and room to grow • Health infrastructure was insufficient. • Concerns regarding the capacity of drainage/sewerage networks • Repairs need to take place to roads and pavements, whilst CCTV was needed to address crime and additional parking was required to support tourism. • Flood risk/surface water run-off needed to be dealt with. Flooding will continue to be a threat due constraints on the culvert under Belton Road and water storage capacity. • Comments and recommendations regarding infrastructure provision made by RUDP Inspector had not been addressed or put in place, whilst a large number of houses had been built. Comments remain valid
4. Impact on the highway network: • A6034 through Silsden experiences congestion, which would be exacerbated by further development with implications for pedestrian/road safety and an increase in pollution. • Road widths and on-street parking was a key issue. • Concerns expressed regarding the impact of traffic from proposed site SI3/H on the congested junction of Elliott Street, Kirkgate and Clog Bridge, as well as on Woodside Road. • Plan did not include proposals to address congestion. • Suggested that bypass should be provided, although it may not occur due to the town's geography and previous development.

Summary of Representations
• Minor attempts made to ease problems at key junctions, but considered that traffic signals were needed as well.
5. Impact on transport network/services: • Transport connections considered to be lacking. • Railway station located some distance from the town, and was not easily and safely accessible for pedestrians due to need to cross A629 dual carriageway. Footbridge/foot crossing had not been provided, with no timetable for increase safety. • Bus and rail services not synchronised, resulting in residents driving to the station which has inadequate parking (even with the proposed car park extension). • Lack of direct public transport links to Skipton. Suggested that a trial service or new triangular service via Ilkley and Steeton should be introduced. • Plan does not take account of Silsden's proximity to North Yorkshire and its communities including Skipton. Benefits of living in Silsden extended beyond the local authority boundary.
6. Impact on Green Infrastructure (GI)/environment: • Identified GI corridors should remain as such. • Proposed site SI3/H noted as being located within a GI corridor, and was contradictory to the designation. Site consisted of high quality dairy farming land and would be contrary to Policy SP5. • Proposed site SI3/H and its surrounding considered an important visual and environment buffer for Silsden and the wider Aire Valley. • Suggested that land to the east/north east of Silsden should be designated as part of a GI/green corridor. Area viewed as important to the community and of historic interest. • Development would harm the area's rural nature and result in the loss of habitats for flora and fauna.
7. Local Area Strategy mapping: • Queried why some areas of land shown on the mapping as un-marked was not identified for a particular use. • Such areas must have a purpose and should be marked as such**.**
8. Provision of open space: • Queried how deficits in certain open space typologies would be address over the plan period. • Much of the open space identified in the Open Space Assessment noted as being privately/operated. Implies that not all members of the public benefit from it. Community only have access to a small percentage of it.

Summary of Representations
• Level of provision not sufficient for an expanding town. • Building on greenfield land would be contrary to the aim of increasing the quantity of natural/semi-natural greenspaces.
9. Provision of employment: • Plan did not include provision for employment and jobs growth in Silsden, including the allocation of sites. • Residents would have to commute for work, which is unsustainable as it would encourage car use due to transport limitations. Contrary to transport policies to minimise travel distances/journeys and achieving net zero. • Two employment sites lost since 2015.
10. Provision of retail and local services: • Plan did not include policies to promote retail or 15 minute neighbourhoods. • Silsden needs to be a vibrant, self-contained "all day" community to avoid becoming a dormitory settlement.
11. Housing mix: • Extra housing not required • New homes would not be aimed at those in lower incomes. • Too much focus on family housing when Silsden needed quality housing for older people**.**
12. Housing density: • A lower housing density factor was being used for the proposed sites, than that required by the plan's policy of 35 dwellings per hectare.
Support
1. Silsden Portrait/Local Area Strategy: • Contents of the spatial portrait supported • Noted that public transport links to Skipton were limited – no direct bus and only route being via the train after a long walk to station including crossing a busy/dangerous dual carriageway. Makes working in Skipton difficult, if travelling by public transport. • Elements of the strategy safeguarding the business park, infrastructure enhancements, protection of wildlife and protection of heritage assets as well as open spaces welcomed and supported. • Removal housing sites at Bolton Road and the Nab welcomed**.**
2. Impact on character:

Summary of Representations
• Overall level of growth proposed considered unbalance. Would make it impossible to conserve the village's character. • Should be reduced by encouraging greater densities on sites elsewhere within the area and the wider District.
3. Impact on infrastructure/services: • Improved pedestrian access to the railway station must be a priority. • Improvements to infrastructure/services should be put in place before development takes place.
Comments
1. Overall level of development: • Some support for the reduced level of housing growth proposed for Silsden as well as rejection of some sites included in earlier versions of Plan. • However, the proposed requirement was still disproportionately large for the settlement's size. • Several hundred homes had been constructed in recent years. Proposed requirement would mean 700 plus dwelling in addition to these completions. • A requirement of 400 dwellings considered to be more appropriate. • Plan did not make allowance for a recent planning permission for 40 dwellings, that would reduce the overall requirement. • Mapping did not show recently complete or approved developments.
2. Housing density: • Low density development and proposed number of dwellings fall short of national recommendations and the neighbourhood plan policy on housing density.
3. Impact on local infrastructure/services: • Local infrastructure considered inadequate to support further growth. Considerable housing growth had taken place; however, the promised infrastructure had been delivered alongside it. • Issues raised regarding the transport network, accessibility and connectivity, whilst several related elements of the portrait and Local Area Strategy were challenged. • The fact that Silsden had good transport connections of other towns and cities was disputed and an over-emphasis had been placed on this connectivity.

Summary of Representations
• Public transport provision and service considered inadequate with no direct bus services to the west, in particular to Skipton (a key destination for work and education) and Cross Hills, whilst bus service 62 no longer serves Leeds Bradford Airport, terminating at Ilkley instead. Buses serve the railway station, but do not connect with rail services. They also do not run via the town centre. • Suggested that a new bus service to Skipton be provided and greater coordination of the bus and rail timetables. • Better public transport was supported, however it queried whether it could be a reality due cuts in services, compromised pedestrian routes and lack of integration between modes. • Silsden located around 1.5 miles from the railway station and requires crossing the A629 dual carriageway to access it. Safe access for cyclists and pedestrians hampered by the lack of a safe crossing or footbridge over the A629 and inadequate footpath and cycle routes along the A6034. • Provision of crossing over the A629 and other linked improvement should be prioritised, noting that proposals had been under consideration for some time. • Lack of parking and a drop off provision at the railway station was a key issue, whilst status of the car park extension was queried**.** • Leeds & Liverpool Canal towpath was noted as still waiting to be upgraded, particularly towards Kildwick. Suggested that more access points to the towpath were provided and development that obscures the canal from view should end. • Transport projects listed in the Plan considered vague and non-specific with specific objections to the lack of inclusion of the proposed crossing over the A629 on the list. Car parking improvements at the station were highlighted as being delayed. • Description in the portrait of secondary education was queried and considered inaccurate. Most pupils from Silsden attend South Craven School in Cross Hills and the grammar schools in Skipton rather than schools in Keighley. • Noted that the new primary school was being constructed as three form entry school (with scope to expand to four form entry). Will only accommodate existing demands. • Considered inadequate if the proposed housing were to be built. The tipping point for funding to be required for expansion was queried. • Concern over the impact of development local health facilities. Suggested that sufficient resources should be put in place ahead of development.
4. Local Area Strategy: • Concerned expressed regarding potential support being provided to developers who wish to redevelop larger sites and/or buildings for new homes not currently identified, subject to all relevant policies in the Local Plan
5. Housing mix and tenure:

Summary of Representations
• Silsden has a need for affordable homes, which had not been delivered as part of recent developments. Queried how this would be met. • Should be a mix of affordable accommodation including the provision of share equity homes. • Focus need on the provision of accommodation for older people to reflect the settlement's older than average population, as well as those with mobility issues. • Provision of development with reduced or no parking areas opposed due to Silsden's lack of transport connectivity and parking issues. • Queried whether proposed new housing would meet the needs and aspirations of local people and what evidence was available to support that assertion. Suggested that it may only benefit those moving to the area. • New homes should be a high standard of design with a mix of house types to serve the community, • Use of higher densities would reduce the amount of greenfield land required.
6. Impact on biodiversity/wildlife: • South Pennine Moors (Phase 2) SPA/SAC (and SSSI) located around to 2km to the east of Silsden. • Places the eastern part of the town within the 2.5km buffer zone and the remainder within the 7km buffer. • Queried what the consequences of development in the zones would for the wildlife within the protected areas. • Sites need to be management closely to ensure ecology is supported within future development. • Specific request made for the area of semi-permanent flash flood/shallow wetland to south of Barratt Homes development to recognised for its value to birdlife. • Would make a contribution the Airedale Landscape Character Area.
7. Impact on landscape: • References in the portrait to landscape surrounding Silsden being sensitive to change welcomed. • Clarification sought in relation to how large development would not comprise the sensitive landscape character.
8. Impact on air quality: • Queried why Silsden was not covered by an Area Quality Management Area (AQMA) and not within the proposed Clean Air Zone (CAZ). • A6034 running through Silsden town centre has narrow sections and pinch points causing congestion with slow moving and/or stationary traffic.

Summary of Representations
9. Development of greenfield land: • Concern over the loss of greenfield sites, with objections to all proposed greenfield sites identified in the Plan for Silsden. • Sites should be protected not destroyed, with people being encouraged to make use of the countryside. • Use of brownfield sites was supported, provided that development met with the approval of Bradford Council and the Town Council. • Land to east of Bolton Road should be omitted from the Plan and returned to the Green Belt. Noted that part of the area was included despite the remainder being rejected.
10. Settlement boundary: • Settlement boundary should be redrawn due to lack of funding for the bypass.
11. Impact on character: • Development would impact on the settlement's character in terms of the scale proposed and the dominance it would exert on the town. Should be taken into consideration. • Large scale development viewed as unsustainable.
12. Impact on highway network: • Main route through Silsden – A6034 – suffers from heavy congestion and was not constructed to from the amount of traffic using it. • Transportation study should have been undertaken before the Local Plan was consulted upon (and should be before adoption), and before any large scale development is permitted. Study should be consulted upon with the community. • Suggested that Silsden be prioritised for funding to secure a 20 mph zone and restrictions placed on HGVs using the A6034 (Kirkgate) • Development in Silsden on its own would not have a severe impact on the capacity, operation and safety of the Strategic Road Network (SRN). • Impacts would be identified as part of the evidence base being prepared by the Council, including wider cumulative impacts of growth outline in the Plan.
13. Provision of employment: • Description in the portrait of Silsden having an employment based disputed. • Considered to be a commuter settlement for other towns and cities. • Employment opportunities are disproportionately low compared to the number of residents in employment. • Several employment sites had been lost to other uses.

Summary of Representations
• Further development would lead to commuting as people would work elsewhere, creating more air pollution. • No employment opportunities identified in the Plan. • Having local employment would help contribute towards the net zero target.
14. Provision of retail: • Town's retail offer below the national average. Additional homes not stimulating retail growth in the town, meaning residents were travelling to larger settlements for shopping purposes. Does not boost local economic growth. • Support for ambition to promote 15 minute neighbourhoods, however strategy needed to make settlements like Silsden more self-contained.
15. Provision of open space: • Deficits in certain open space typologies noted. • Building on greenfield sites would not improve the situation. • Considered should be given to increasing areas of natural/semi-natural greenspace and Parks/Gardens. • Suggested that Hawber Cote Fields would be a suitable location for this.
16. Provision of sporting/leisure facilities: • Despite availability of green spaces, Silsden does not have an all-weather sports facility or a public swimming pool. • Sports and leisure facilities considered to be limited. • Golf Course has closed down.
17. Settlement hierarchy: • No explanation given for Silsden's classification as a Local Growth Centre within the settlement hierarchy**.**
18. Population levels: • Population figures quoted in the portrait was queried. • Population was 8,268 in 2011 and was likely to have grown since that point due to housing development that has taken place.
19. Local geography: • Distance between Silsden, Steeton and the River Aire quoted in the portrait was queried.

Summary of Representations
20. Local Plan flexibility: • Flexibility should be built into the Plan to respond to changes. • Neighbourhood Plan should be reviewed.

Representation IDs: 303, 635, 653, 897, 1050, 1234, 1489, 1976, 2463, 3144, 5065, 6418, 6597, 6825, 6874, 8092, 9711, 10006, 11401, 13193, 13332, 15501, 17227, 21777, 23720, 23764,23835, 24272, 26517, 26642, 29539, 29721, 29722, 29723, 29724, 29725, 29726, 29727, 29728, 29729, 29730, 29731, 29732, 29733, 29734, 29738, 30202

Sites

As highlighted above, eight sites were put forward in the Preferred Options document to meet the proposed development requirements for Silsden (8 for residential). Under Q113 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **194** representations were received in relation to policies SI1/H to SI8/H from **130** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents and a Ward Councillor. **Table 0.2** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.3**.

Table 0.2: Silsden Proposed Sites (SI1/H to SI8/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SI1/H: North Dene Road	27	21	21	1	5
SI2/H: Bolton Road/Brown Bank Lane	27	23	23	1	3
SI3/H: Woodside Road	39	29	30	1	8
SI4/H: Sykes Lane	26	19	19	0	7
SI5/HC: Keighley Road	21	12	11	3	7
SI6/H: Aire View Infants, Elliott Street	17	5	5	7	5
SI7/H: Hothfield Junior School	21	10	10	7	4
SI8/H: Dradishaw Road	17	13	13	0	4
Totals	**194**	**130**	**132**	**20**	**43**

Table 0.3: Silsden Proposed Sites (SI1/H to SI8/H) – Summary of Representations Received

SI1/H: North Dene Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SI1/H: North Dene Road	27	21	21	1	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site access • Impact on local infrastructure/services • Impact on the highway network • Development on greenfield/Green Belt land • Impact on trees, hedgerows and biodiversity/wildlife • Loss of agricultural land • Overall level of development • Flood risk/drainage • Impact on health and wellbeing and open/green spaces • Provision of employment • Impact on amenity • Proposed site allocation was supported • Site development/development considerations • Deliverability • Ground conditions and topography	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1087 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Site access: • Spencer Avenue and Hillcrest Avenue are not adopted highways and in a poor state of repair, rendering them unsuitable to support development. • Both should be brought up to adoptable standards by any future developer. Should be done before development occurs.
2. Impact on local infrastructure/services: • Ability and availability of local infrastructure to support/cope with further growth was questioned, and had not been considered when drawing up the Local Plan. • There are capacity issues at the local health centre, hospital and the new primary school. Suggested that a new secondary school was needed. • Rail services experience overcrowding and whilst it was difficult to access the railway station. • The level of affordable/social housing provision was queried. • Utilities networks (gas, electricity, water/sewerage) had not been updated to sustain further development.
3. Impact on the highway network: • The local highway network was considered to be congested in a several places – Kirkgate and the roundabout on the Aire Valley Trunk Road – causing delays in getting into and out of, as well as through Silsden. • Objections to the lack of provision on the Plan's mapping for a bypass. • Main route through the town was dangerous.
4. Development on greenfield/Green Belt land: • Contravenes Government's objective to avoid prime greenfield land being developed and protect Green Belt land. • Site considered to be Green Belt and that changes to its boundaries should only be made in "exceptional circumstances" with inappropriate development only being approved in "very special circumstances". • Site should not be developed. Council should demonstrate that all other reasonable options to meet identified development needs have been considered. • Sufficient brownfield site available with abandoned or used buildings that should be considered and used first. first, including bring empty/unoccupied dwellings back into use. • Keighley Town Centre considered as an appropriate location for affordable housing provision

5.	**Impact on trees, hedgerows and biodiversity/wildlife:** • Trees with TPO designations present along the eastern boundary of the site. Development would impact upon them. • Two trees noted as being potentially unique specimens, which could be damaged. • Development would impact on wildlife habitats present on the site. Site supports a thriving bird population as well as other animals and insects. • Site within the 2.5km buffer of the South Pennine Moors SPA/SAC.
6.	**Loss of agricultural land:** • Would result in the loss of agricultural land.
7.	**Overall level of development:** • Proposed level of housing growth for Silsden (580 dwellings in addition to 300 plus being developed or approved) was viewed as being unfair and more than its future requirement or its fair share. • Was more than enough housing in Silsden and due to recent developments, the need for more no longer applied. • The impact of developments currently under construction in Silsden had yet to be felt within the community. • No evidence provided stipulating that Silsden and Steeton with Eastburn's housing needs warrants the release of land for 798 dwellings. • No justification demonstrating that all other possible options have been considered.
8.	**Flood risk/drainage:** • Would increase surface water run-off and exacerbated flooding issues in the town. • Site located within the inundation area from the reservoir. • Site prone to waterlogging and had a number of springs and culverts present. • Concerns over impacts on local streams/watercourse along the eastern and western boundaries and their water quality.
9.	**Impact on health and wellbeing and open/green spaces:** • Open spaces/green spaces have a key role in contributing towards improved health and wellbeing by creating opportunities for exercise and physical activity. • Local green spaces should be retained to allow local people to have good access to them. • Site should remain an open grassland area as it will contribute to carbon sequestration and reduce the impact of carbon on the atmosphere. More effort should be concentrated on building on brownfield sites.

- Silsden noted as lacking play spaces for younger children.

10. Provision of employment:

- Area lacks jobs, which results in more people commuting for work. Would add to traffic on an already busy road network and increase pollution.

11. Impact on amenity:

- Impact on immediately adjacent residential areas from potential overlooking and loss of privacy.

Support:

1. Proposed site allocation:

- Proposed site allocation was supported.
- Considered to be close to the centre of Silsden
- Offered opportunities for local environment enhancement.

2. Site development/development considerations:

- Suggested that development should retain existing trees and hedgerows as a key feature.
- Number of dwellings could be increased by incorporating adjacent site containing garages.
- Five percent or more of plots should be made available for self-build opportunities.
- Highway access and footpaths would need to improved and an appropriate drainage network considered.
- Ecological survey would be required and a green space provided, e.g a pocket park/

Comments:

1. Site access:

- Would use an unadopted highway (Spencer Avenue)
- Surrounding road network in a poor condition – Spencer Avenue has subsidence issue and was unable to sustain more traffic, Sackville Road has numerous potholes whilst Hillcrest Avenue is in a poor state.
- Queried whether an acceptable access be achieved due the narrow nature of surrounding streets and on-street parking on the site approach.

2. Impact on local infrastructure/services:

- Bus service no longer serves Leeds Bradford Airport, terminating in Ilkley instead

3.	**Deliverability:** • Site had been identified as Safeguarded Land in the RUDP and remains outside of Green Belt, but had not come forward for development. • Site scores less favourably against SA Objectives 4 and 10 than sites SI/003, SI004 and SI/004A.
4.	**Impact on biodiversity/wildlife:** • Site contains potential ecological sensitivities and was in close proximity to areas of TPO woodland**.**
5.	**Ground conditions and topography:** • Site may be affected by land contamination from the surrounding streets. • Site's topography and levels considered to present a barrier to its deliverability.
6.	**Flood risk/drainage:** • Waterlogging present on site. • Springs and culverts were also present. • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 639, 860, 1066, 1142, 1415, 1491, 1963, 3474, 3932, 3971, 4091, 4742, 6202, 6655, 6826, 7035, 7191, 8093, 13194, 20579, 21178, 23475, 23794, 24274, 27474, 28625, 29741

SI2/H: Bolton Road/Brown Bank Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SI2/H: Bolton Road/Brown Bank Lane	27	23	23	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on landscape and character • Impact on the highway network • Site access and impact on road safety • Impact on biodiversity/wildlife • Impact on designated heritage assets • Development of Green Belt/greenfield land • Proposed site allocation supported. • The site was proposed for allocation despite the adjacent area being rejected on access, landscape impacts and heritage impacts • Impact on amenity • Overall level of development • Impact on local infrastructure/services • Flood risk/drainage • Impact on health and wellbeing and open/green spaces • Provision of employment • Housing density • Sustainability/accessibility	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1065 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

• Proximity to South Pennine Moors SPA/SAC • Provision of bypass route • Location of development	

Objections:
1. Impact on landscape and character: • Development would have a negative impact on the local landscape as well as the character and surroundings of the town. • Site forms a natural green space and boundary on the northern edge of the settlement. • Site, and its surroundings, were a key attraction, adding to the landscape and views. Area is well loved and enjoyed by residents for recreation, in particular walking. • Development would be detrimental to, and erode or spoil, the town's character including its green spaces, landscapes and affect the rural aspect of Brown Bank Lane. • Would compromise resident's day to day lives and impact on nature and biodiversity. • Would lead to an extension into the countryside and an area of historic merit. The adjacent allotments would also be impacted upon.
2. Impact on the highway network: • Objection due to level of traffic travelling through Silsden and the congestion/delays that it causes in the town as well as the impacts it has on resident's quality of life. • Traffic noise and air pollution was an impact of traffic. Further development would increase these impact and be unsustainable. • A bypass was historically proposed to allow development to take place. • The effects of development and its impact on traffic needed to be considered and fully understood. • The local highway network was considered to be congested in a several places – Kirkgate and the roundabout on the Aire Valley Trunk Road – causing delays in getting into and out of, as well as through Silsden. • Objections to the lack of provision on the Plan's mapping for a bypass. • Main route through the town considered dangerous.
3. Site access and impact on road safety: • Access considered problematic as Bolton Road is a major route between Airedale and Wharfedale and would not be sensible access point due the busy nature of the road.

- Lack of footpath on eastern side of Bolton Road, meaning no sustainable pedestrian access to the town centre.
- There had been a number of accidents on Bolton Road. Creating a new access would result in a dangerous corner and disrupt an important walking route.
- Site design would require a buffer zone to the A6034 to address safety issues, meaning density targets would not be met.

4. Impact on biodiversity/wildlife:

- Site within the 2.5km buffer of the South Pennine Moors SPA/SAC (Zone B) (and SSSI), located around 2km to the east. Development would be inappropriate.
- Site considered an important area for wildlife with development resulting in the loss of habitats. Nesting Curlews noted as being present on the site.
- Habitat Regulations Assessment should take account of the presence of badgers, toads, deer and bats in the area.
- Site located within a key Green Infrastructure corridor.
- Agricultural land would be lost, whilst it is located adjacent to allotments.

5. Impact on designated heritage assets:

- Site located in proximity to several Grade II Listed Buildings and may have potential to adversely effect on their setting.

6. Development of Green Belt/greenfield land:

- Objections to the development and use of Green Belt/greenfield land generally, including strong objections to the development on the proposed site.
- Site should remain greenfield in line with RUDP Planning Inspector's recommendations, particular as infrastructure issues had not been addressed.
- Sufficient brownfield site available with abandoned or used buildings that should be considered and used first. first, including bring empty/unoccupied dwellings back into use.
- Keighley Town Centre considered as an appropriate location for affordable housing provision
- Site, together with other land to its north and east should be returned to the Green Belt and settlement boundary to give it more permanent protection. Considered appropriate as the bypass was no longer fundable from housing development and would be contrary to policy.

7. Proposed site allocation:

- Noted that site was proposed for allocation despite the adjacent area being rejected on access, landscape impacts and heritage impacts

8. Impact on amenity: • Development could have an effect on neighbouring properties and residents, including impacts on views.
9. Overall level of development: • Proposed level of housing growth for Silsden (580 dwellings in addition to 300 plus being developed or approved) was viewed as being unfair and more than its future requirement or its fair share. • The impact of developments currently under construction in Silsden had yet to be felt within the community. • Site not required to deliver the proposed housing requirement due to recent planning approvals (60 dwellings on two sites) that would contribute towards it.
10. Impact on local infrastructure/services: • Ability and availability of local infrastructure to support/cope with further growth was questioned, and had not been considered when drawing up the Local Plan. • There are capacity issues at the local health centre, hospital and the new primary school. Suggested that a new secondary school was needed. • Rail services experience overcrowding and whilst it was difficult to access the railway station. • Utilities networks (gas, electricity, water/sewerage) also raised. • Parking provision in the town centre and at the railway station considered to be limited. • Bus service no longer serves Leeds Bradford Airport, terminating in Ilkley instead
11. Flood risk/drainage: • Site noted as having were drainage issues with areas of it being bog land and being in close proximity to the former Silsden Reservoir. • Concern that the land drainage issues could severely affect properties to the south, Silsden Park and the electricity sub-station.
12. Impact on health and wellbeing and open/green spaces: • Retaining open spaces and providing access to them considered important for health and wellbeing, and should be taken into account. • Silsden noted as lacking play spaces for younger children.
13. Provision of employment: • Area lacks jobs, which results in more people commuting for work. Would add to traffic on an already busy road network and increase pollution.
11. Housing density:

- Proposed housing density on the site was lower than expected.
- Densities should be increased on the site (as well as others elsewhere) in order to reduce the level of greenfield site allocations.

14. Sustainability/accessibility:

- Development would not be sustainable due to distance from the railway station and the associated access issues related to it.

Support:

1. Proposed site allocation:

- Proposed site allocation supported, including the conclusions of the site proforma set out in the Plan.
- Technical work undertaken to the support a masterplan for the site's development as part of the wider SHLAA site SI/004
- The non-inclusion of the wider SHLAA site SI/004 was objected to.

Comments:

1. Proximity to South Pennine Moors SPA/SAC:

- Site located within close proximity to the South Pennine Moors SPA.
- Potential to lead to the loss of functionally linked land for SPA birds.
- Approach in the Local Plan, SPD and assessment to loss of functionally linked land welcomed.
- Recommended that the site is screened via the model for identifying suitable sites for SPA Golden Plovers.
- Where the loss of functionally linked land cannot be ruled out, it was recommended that allocation requirement text in the plan sets out survey and mitigation requirements clear.

2. Provision of bypass route:

- Previous Unitary Development Plan (UDP) contained a caveat that development on the proposed site (and those in the immediate vicinity) stipulating that a bypass should be provided as part of it.
- Piecemeal development currently taking place would not attract the funding needed to provide the bypass, and as such, the proposed site should be removed from the allocations

3. Impact on the highway network:

- Concerns over the impact of traffic arising from the new primary school and its effect on Bolton Road. It was felt to be unknown.
- Suggested that no sites should be brought forward until the school opens and a full transport survey completed**.**

4. Location of development:

• Suggested that the proposed dwellings could be incorporating into other sites.
5. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development

Representation IDs: 1504, 1962, 2031, 2564, 3942, 3970, 4068, 4935, 6203, 6827, 7036 ,7192, 8149, 11931, 13195, 13333, 17228, 19896, 20581, 21179, 23476, 23716, 23836, 24275, 27471, 28626, 29742

SI3/H: Woodside Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SI3/H: Woodside Road	39	29	30	1	8

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Overall level of development • Development of Green Belt/greenfield land • Impact on local infrastructure/services • Impact on the highway network • Site access • Previous planning history • Impact on character • Impact on amenity • Housing density • Impact on health and wellbeing and open space • Impact on biodiversity/wildlife • Impact on landscape and visual amenity • Loss of and impact on agricultural land • Impact on trees and hedgerows • Flood risk/drainage • Impact on designated heritage assets • Provision of employment • Proposed site allocation supported • Design/layout of development • Proximity to the Leeds & Liverpool Canal	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1089 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

• Deliverability	

Objections:
1. Overall level of development: • Proposed level of housing growth for Silsden (580 dwellings in addition to 300 plus being developed or approved) was viewed as being unfair and more than its future requirement or its fair share. • Was more than enough housing in Silsden and due to recent developments, the need for more no longer applied • The impact of developments currently under construction in Silsden had yet to be felt within the community. • Silsden has reached its optimum size. Other locations for development should be sought. • Recent development had not created sufficient affordable housing to meet local needs. • Queried who would occupy the proposed homes.
2. Development of Green Belt/greenfield land: • Objections to the development and use of Green Belt/greenfield land generally, including strong objections to the development on the proposed site. Such sites should not be lost and residents did not wish to see anymore lost. • Sufficient brownfield site available with abandoned or used buildings that should be considered and used first. first, including bring empty/unoccupied dwellings back into use. • Keighley Town Centre considered as an appropriate location for affordable housing provision. Suggest that spaces over shops should be renovated or old buildings used in preference to greenfield sites. • Site, together with other land to its north, south and east should be returned to the Green Belt. • Development greenfield/Green Belt would impact on Silsden's character, its surrounding green spaces and the countryside as well as nature and local residents.
2. Impact on local infrastructure/services: • Ability and availability of local infrastructure to support/cope with further growth was questioned, and had not been considered when drawing up the Local Plan. • Existing infrastructure at breaking point or struggled with no investment taking place. Development would place un-necessary pressure on infrastructure and resources. • There are capacity issues at the local health centre, hospital, shops, children's centre and the new primary school. New school is located some distance from the site, meaning it would a long way for pupils to walk resulting in them travelling by car to reach it.

- Suggested that a new secondary school was needed. South Craven School considered to be over-subscribed.
- Rail services experience overcrowding and whilst it was difficult to access the railway station safely on foot as the A629 was a danger to cross.
- Public transport routes constrained by on-street parking and traffic volumes.
- Utilities networks (gas, electricity, water/sewerage) and their capacity to support development also raised. Sewerage network along Elliott Street was at maximum capacity.
- Parking provision in the town centre and at the railway station considered to be limited.
- Implications of existing development on infrastructure and transport needed to be fully understood before further growth takes places.
- Level of social housing to be provided on the site queried.
- Silsden lacks provision of spaces and activities for children, including playgrounds as well as leisure provision.

3. Impact on the highway network:

- Objection due to level of traffic travelling through Silsden and the congestion/delays that it causes in the town.
- Local highway network was considered to be congested in a several places – Kirkgate and the roundabout on the Aire Valley Trunk Road – causing delays in getting into and out of, as well as through Silsden.
- Town's highway network had not been updated despite increasing traffic levels. Further development would add to and exacerbate the existing situation.
- Traffic noise and air pollution would be increased.
- Without the provision of a bypass, heavy traffic will continue to travel through Silsden, creating further hazards and congestions.
- Concerns also focussed on the impacts on the road network adjacent to the site (Woodside Road and Elliott Street) as well as the junction between Elliott Street, Keighley Road and Clog Bridge.
- More vehicles would use these streets, which were considered incapable of accommodation existing and future traffic levels and poorly maintained. Will pose a risk to road safety.
- Elliott Street serves several community facilities, whilst junction with Keighley Road was congested and dangerous with the bridge over the canal contributing towards it.
- Additional homes and vehicles from development would exacerbate the issues experience at the junction. Suggested that traffic signals may be a potential solution.
- Road widths and on-street parking also an issue.

4. Site access:

- Site located close to a dangerous bend. Adding a further access point for residential development would increase dangers.
- Existing access points not suitable due to their width. Noted that one could not be widened as it consisted of a farm track.
- Both points unlikely to be able provide access for emergency vehicles.

5. Previous planning history:

- RUDP Planning Inspector considered the site should remain greenfield, particularly as infrastructure issues had not been addressed.
- A 1996 public inquiry rejected the site due to access problems via Elliott Street. A new access road would be needed.
- Circumstances considered to still apply.

6. Impact on character:

- Silsden has become a dormitory/commuter settlement with a different atmosphere.
- Concern that overdevelopment adjacent to the canal would take place, similar to that experience on the eastern side of the town.

7. Impact on amenity:

- Amenity and privacy of neighbouring properties would be affected.
- Noise pollution, disruption and inconvenience would be increased, whilst there would be a loss of views and property devaluations.

8. Housing density:

- Proposed housing density on the site was lower than expected, include brownfield site SI5/HC.
- Densities should be increased on the site (as well as others elsewhere) in order to reduce the level of greenfield site allocations.

9. Impact on health and wellbeing and open space:

- Good quality, accessible green and open spaces considered important places for exercise and improving health and wellbeing.
- Such areas should be retained for residents, in particular children to access them for recreation.
- Development would result in the loss of green and open spaces.

10. Impact on biodiversity/wildlife:

- Will be a loss of wildlife habitats.
- Site is home to a wide variety of animals and birds, including bats
- Development adjacent to the canal would limit wildlife habitats. The Canal was noted as being a Local Wildlife Site (LWS).
- Site located with the 7km buffer of the South Pennine Moors SPA/SAC.
- Within a key green infrastructure corridor.

11. Impact on landscape and visual amenity:

- Site location would mean significant landscape and visual impacts on the surrounding area and the Aire Valley, in particular.
- Rural nature of the area would be harmed, whilst there would be an impact on an area of natural beauty.

12. Loss of agricultural land:

- Loss of attractive pasture and a reduction of agricultural land.

13. Impact on trees and hedgerows:

- Site contains a number of trees and hedgerows, some of which benefit from TPO/TPO woodland designation and form ancient hedgerows.
- Would be lost were the site to be developed.

14. Flood risk/drainage:

- Development would impact on surface water flooding, increase run-off and result in the loss of natural drainage.
- An underground stream was present on the site.

15. Impact on designated heritage assets:

- Site located adjacent to the Leeds & Liverpool Canal Conservation Area (CA). Potential for an adverse impact on this key designated heritage asset.
- Views along the canal towpath towards Silsden are an important feature of the CA. Development could harm elements that contribute to the CA's significance.
- An assessment should be undertaken (before allocation) of the site's contribution towards those elements that contribute towards the designated heritage asset's significance and the impact that development would have.

16. Provision of employment:

- Area lacks jobs, which results in more people commuting for work. Would add to traffic on an already busy road network and increase pollution.

Support:

1. Proposed site allocation:

- Proposed site allocation supported provided that infrastructure for its (and other proposed sites) was provided in advance of development.
- Includes upgrading the utilities (combined sewer, electricity supply), highways and footpath networks as well as providing a bridge to access the railway station.

- Noted that there were bus stops nearby, and potential to provide separate vehicle and pedestrian/cycle access to Woodside Road.
- Site has easy access to the canal towpath.

2. Design/layout of development:

- Suggested that existing trees and hedgerows be retained within any future layout with additional planting to support wildlife.

3. Proximity to the Leeds & Liverpool Canal:

- Discussions should take place with the Canal & River Trust in relation to the canal bank and its structural integrity.

Comments:

1. Previous planning history:

- RUDP Planning Inspector considered the site to be inappropriate for development as the Elliott Street/Keighley Road junction was not capable of safely dealing with the increased level of traffic created by its development.

2. Proximity to the Leeds & Liverpool Canal:

- Site located adjacent to the Leeds & Liverpool Canal.
- Stability of the slope to the north of the canal and the implications of development upon it should be address as part of any planning application. Wording to that effect should be added to the development considerations in the site proforma.
- Suggested that further details or surveys may be required at the planning application stage.
- Established vegetated buffer between the site and the canal should be strengthened to minimise adverse impacts.
- Landscape and visual impact assessment would be required to recognise the value of the canal's setting. Wording to that effect should be added to the development considerations in the site proforma

3. Impact on biodiversity/wildlife:

- Need to ensure site minimises impacts on biodiversity and provides biodiversity net gains.
- Risk that development could harm biodiversity associated with the Green/Blue Infrastructure along the canal.
- Development considerations should include a requirement for the provision of biodiversity assessments and enhancement strategies for the site.

4. Deliverability:

- Despite being identified as safeguarded land in the RUDP, no planning applications or inquiries had come forward regarding its development.
- Potential ownership constraints/issues.

• Site's availability and deliverability questioned. Queried whether evidence was available to justify its allocation.
5. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1), albeit adjacent to the Leeds & Liverpool Canal. • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development
6. Impact of designated heritage assets: • Site located adjacent to the Leeds & Liverpool Canal Conservation Area. • Development would have a negative impact.
7. Impact on agricultural land: • Site may be located on Best and Most Versatile (BMV) agricultural land, which should be safeguarded in line with national policy. • Recommended that an Agricultural Land Classification (ALC) survey be undertaken to determine the site's ALC grade and to inform future Masterplanning and soil handling. • Would help to inform the SA and assess the impact of the plan on soil resources.

Representation IDs: 861, 996, 1236 ,1485, 1505, 1627, 1802, 1961, 3960, 3978, 4186, 4362, 4809, 4832 ,6161, 6204, 6828, 6830, 6849, 7038, 7193 , 8094 ,8150 ,9712 ,10948, 11492, 13197, 13660, 19902, 20582, 21181, 23477, 23795, 24276, 26643, 27475, 28627, 29409, 29743

SI4/H: Sykes Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SI4/H: Sykes Lane	26	19	19	0	7

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Overall level of development • Impact on local infrastructure/services • Impact on the highway network • Development of Green Belt/greenfield land • Impact on character • Site access • Impact on biodiversity/wildlife • Loss of agricultural land and Impact on agricultural land • Impact on designated heritage assets • Flood risk/drainage • Housing density • Impact on allotments • Impact on Sykes Lane • Provision of employment • Proximity to the Leeds & Liverpool Canal • Impact on landscape and visual amenity • Impact on trees and hedgerows • Deliverability	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1090 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Overall level of development: • Proposed level of housing growth for Silsden (580 dwellings in addition to 300 plus being developed or approved) was viewed as being unfair and more than its future requirement or its fair share. • Was more than enough housing in Silsden and due to recent developments, the need for more no longer applied • The impact of developments currently under construction in Silsden had yet to be felt within the community.
2. Impact on local infrastructure/services: • Ability and availability of local infrastructure to support/cope with further growth was questioned and had not been considered when drawing up the Local Plan. Would place un-necessary pressure on infrastructure and resources. • There are capacity issues at the local health centre, hospital, shops, and the new primary school. Suggested that a new secondary school was needed. • Rail services experience overcrowding and whilst it was difficult to access the railway station safely on foot as the A629 was a danger to cross. • Utilities networks (gas, electricity, water/sewerage), footpaths and highways and their capacity to support development also raised. Improved networks are required together with the provision of bridge to access the railway station. • Parking provision in the town centre and at the railway station considered to be limited. • Implications of existing development on infrastructure and transport needed to be fully understood before further growth takes places. • Level of social housing to be provided on the site queried.
3. Impact on the highway network: • Objection due to level of traffic travelling through Silsden and the congestion/delays that it causes in the town. • Local highway network was considered to be congested in a several places – Kirkgate and the roundabout on the Aire Valley Trunk Road – causing delays in getting into and out of, as well as through Silsden. • Objections to the lack of provision on the Plan's mapping for a bypass.
4. Development of Green Belt/greenfield land: • Objections to the development and use of Green Belt/greenfield land generally. It should not be lost and residents did not wish to see anymore lost. • Should be used to provide recreational or outdoor space to plant trees or enjoy nature.

- Site should remain greenfield in line with RUDP Planning Inspector's recommendations, particularly as infrastructure issues had not been addressed.
- Sufficient brownfield site available with abandoned or used buildings that should be considered and used first, including bring empty/unoccupied dwellings back into use.
- Keighley Town Centre considered as an appropriate location for affordable housing provision.
- Site, together with other land to its north, south and east should be returned to the Green Belt.

5. Impact on character:

- Development of greenfield/Green Belt land would impact on Silsden's character, its surrounding green spaces and the countryside as well as nature and local residents.

6. Site access:

- Concerns expressed regarding the site access and how it would be delivered. Viewed as a fundamental issue to be addressed.
- Noted that "The Banks" development (site SI5/HC) layout included an access route. However, further improvements (potentially traffic signals) would be required at the junction with Keighley Road.

7. Impact on biodiversity/wildlife:

- Site located immediately adjacent to the Leeds & Liverpool Canal Local Wildlife Site (LWS). Potential for adverse impacts on the LWS.
- Site home to a variety of wildlife and flora, which would be lost.
- Site located within the 7km buffer zone for the South Pennine Moors SPA/SAC (Zone C).

8. Loss of agricultural land:

- Agricultural land would be reduced.

9. Impact on designated heritage assets:

- Site located adjacent to the Leeds & Liverpool Canal Conservation Area, which would be adversely affected by development.
- An assessment should be undertaken of the site's contribution towards those elements that contribute towards the designated heritage asset's significance and the impact that development would have.
- Would determine the nature of the measures needed to remove/reduce harm to be included within the Plan or whether the site will continue to be allocated.

10. Flood risk/drainage:

- Site partly located in Flood Zones 2 (FZ2) and 3 (FZ3) and, therefore should not be built upon.

- Potential for flood risk arising from the canal, which suffers leakage at several points.

11. Housing density:

- Proposed housing density on the site was lower than expected, include brownfield site SI5/HC.
- Densities should be increased on the site (as well as others elsewhere) in order to reduce the level of greenfield site allocations.

12. Impact on allotments:

- Site is occupied by allotments, animal pens and small-holdings.
- Considered to be an integral and necessary part of the community, and beneficial for health and wellbeing as well as enjoyment of the outdoors.

13. Impact on Sykes Lane:

- Site located adjacent to Sykes Lane – a 500-year-old protected lane with ancient hedgerows.
- Lane would be adversely affected by development and hedgerows would be lost.
- Suggested that the site be divided into two sections with the ancient hedgerows protected along Sykes Lane to provide a natural barrier and supporting habitats.
- Access across the lane would erode the value of this key feature in the town's history.

14. Provision of employment:

- Area lacks jobs, which results in more people commuting for work. Would add to traffic on an already busy road network and increase pollution.

Support:

No representations received in support

Comments:

1. Impact on the highway network:

- Development would impact on the local highway network, in particular Keighley Road which was considered to be heavily congested.
- Effects of increased traffic on the junction of Keighley Road/Elliott Street would need to be addressed.

2. Proximity to the Leeds & Liverpool Canal:

- Site located adjacent to the Leeds & Liverpool Canal, which is on an embankment with a higher elevation.
- Will be a need to ensure that development does not impact upon the embankment's stability**.**

- Recommended that wording be included as part of the development considerations for the site within the Local Plan. Guidance suggested for the planning application stage.

3. Impact on landscape and visual amenity:

- A Landscape and Visual Impact Assessment would be needed in order to recognise the value of the canal's setting as well as to make a reasonable evaluation of impacts of development and recommendations to address them.
- Suggested that this could be made a requirement as part of the development considerations within the Local Plan.

4. Impact on biodiversity/wildlife:

- Need to ensure development minimises impacts on biodiversity and provides biodiversity net gains.
- Risk that development could harm biodiversity associated with the Green/Blue Infrastructure along the canal.
- Development considerations should include a requirement for the provision of biodiversity assessments and enhancement strategies for the site.

5. Flood risk/drainage:

- Site located at a lower elevation that the adjacent canal bank, meaning it would be vulnerable to any breach or leakage.
- Risk should be considered as part of flood assessment work, including mitigation to reduce risk in event of a breach, and highlighted as a development consideration within the Local Plan.
- Parts of the site are located with Flood Zones 2 (FZ2) and 3 (FZ3) as well as a current/draft FZ3a(i)/FZ3b.
- No development should take place in FZ3a(i) or FZ3b unless water compatible or essential infrastructure.
- Development should follow a sequential approach to prevent un-necessary development in FZ2, FZ3 and FZ3nb.
- Guidance provided on appropriate flood mitigation measure and surface water discharge rates.

6. Impact on agricultural land:

- Site may be located on Best and Most Versatile (BMV) agricultural land, which should be safeguarded in line with national policy.
- Recommended that an Agricultural Land Classification (ALC) survey be undertaken to determine the site's ALC grade and to inform future Masterplanning and soil handling.
- Would help to inform the SA and assess the impact of the plan on soil resources.

7. Impact on designated heritage asset:

- Site adjacent to the Leeds & Liverpool Canal Conservation Area.

• Potential for negative impacts on the Conservation Area from development. • Need to ensure that it is not compromised.
8. Impact on trees and hedgerows: • Existing hedgerows, including Ancient Hedgerows, and trees should be protected and trained within the site. • Would be in line with Policy EN3.
9. Deliverability: • Site's deliverability questioned as it will be reliant on vehicle access being provided via an adjacent site (site SI5/HC). This may be not be guaranteed and ransomed by a third party. • Access would need to cross Sykes Lane (identified in the neighbourhood plan as a protected feature). • Potential multiple ownership issues as well as loss of allotments. • Performs less well against elements of the Sustainability Appraisal. • Does not have sufficient certainty to be an allocation. Were comparable, more sustainable non-allocated site that can demonstrate deliverability.

Representation IDS: 863, 1034, 1055, 1517, 1966, 3964, 3979, 4240 ,4862, 6205, 6829, 6831, 7194, 8151, 13198, 13661, 19903, 20365, 20584, 21180, 23478, 24277, 27476, 28628, 29410, 29744

SI5/HC: Keighley Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SI5/HC: Keighley Road	21	12	11	3	7

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Overall level of development • Impact on local infrastructure/services • Impact on the highway network and transport infrastructure • Impact on character • Development of Green Belt land • Flood risk/drainage • Impact on biodiversity/wildlife • Housing density • Proposed site allocation supported as it was brownfield • Site access • Existing planning permission • Sustainability • Housing mix and tenure • Provision of open space	This site is now fully developed for residential use.

Objections:
1. Overall level of development:

• Proposed level of housing growth for Silsden (580 dwellings in addition to 300 plus being developed or approved) was viewed as being unfair and more than its future requirement or its fair share. • Was more than enough housing in Silsden and due to recent developments, the need for more no longer applied. • The impact of developments currently under construction in Silsden had yet to be felt within the community.
2. Impact on local infrastructure/services: • Ability and availability of local infrastructure to support/cope with further growth was questioned, and had not been considered when drawing up the Local Plan. Would place un-necessary pressure on infrastructure and resources. • There are capacity issues at the local health centre and the new primary school. • Rail services experience overcrowding and whilst it was difficult to access the railway station. • Implications of existing development on infrastructure and transport needed to be fully understood before further growth takes places. • The level of affordable/social housing provision was queried. • Has been a lack of investment in Silsden.
3. Impact on the highway network: • The local highway network was considered to be congested in a several places – Kirkgate and the roundabout on the Aire Valley Trunk Road – causing delays in getting into and out of, as well as through Silsden. • Objections to the lack of provision on the Plan's mapping for a bypass. • Main road through the town considered dangerous.
4. Impact on character: • Development would impact on the character of Silsden and its surrounding green spaces as well as on nature, and local residents.
5. Development of Green Belt land: • Green Belt land should not be used for development • There are sufficient brownfield sites with abandoned/used buildings that should be considered first, including bring empty/unoccupied dwellings back into use. • Keighley Town Centre was considered as an appropriate location for affordable housing provision.
5. Flood risk/drainage: • Site located within a flood zone and suffers from surface water flooding.

- Undertaking further flood risk assessments would be a waste of time and money.

6. Impact on biodiversity/wildlife:

- Site contaminated with Japanese Knotweed, which may affect insurance cover for new dwellings.

7. Housing density:

- Proposed housing density on the site was lower than expected.
- Densities should be increased on the site (as well as others elsewhere) in order to reduce the level of greenfield site allocations.

Support:

1. Proposed site allocation:

- Proposed site allocation supported as it was brownfield.

2. Impact on local infrastructure/services:

- Proposed site allocation supported provided that infrastructure to support growth was put in place in advance or parallel to development.
- Infrastructure would include upgrading of the combined sewer and electricity supply networks as well as improvements to highways and footpaths include a new bridge to access the railway station.
- Noted that a developer contribution had been secured towards the bridge as part of the outline planning permission on the site.

3. Site access:

- Considered disappointing that that access arrangements did not allow for proposed site SI4/H to come forward or the inclusion of a crossing point to access Aldi as well as interconnectivity with Belton Road and access to cycle/walking routes.

4. Impact on biodiversity/wildlife:

- Noted that site was to include an area of wetland habitat.
- Should be delivered before, or in parallel with development to ensure residents can use it from first occupation.

Comments:

1. Existing planning permission:

- Site already benefits from planning permission for 156 dwellings granted in January 2021 and expected to come forward within the plan period**.**

2. Overall level of development:

	• Planning permission on the site should be taken into, together with the substantial amount of housing developments that had taken place in recent years as well as their cumulative effects before building a further 700 homes.
3.	**Sustainability:** • Site attracted more negative scores in respect of Sustainability Appraisal (SA) Objectives 4 (Climate Change Resilience) and 6 (Biodiversity and Geodiversity) than excluded sites SI/003 and SI/004.
4.	**Housing mix and tenure:** • Site should provide a mix of affordable housing include a substantial amount of shared ownership housing and starter homes to allow younger people to purchase a home.
5.	**Impact on the highway network and transport infrastructure:** • Concerns regarding the impact of development on the highway network and the transport network. • Keighley Road considered to be congested, whilst the railway station despite being close by, safe access to it remained a problem.
6.	**Provision of open space:** • Concerns over the amount of green space and planting that would occur within the development.
7.	**Flood risk/drainage:** • Concerns regarding flood risk raised. • Parts of the site are located with Flood Zones 2 (FZ2) and 3 (FZ3) as well as a small section of FZ3a(i). • No development should take place in FZ3a(i) unless water compatible or essential infrastructure. • Development should follow a sequential approach to prevent un-necessary development in FZ2 & FZ3. • Guidance provided on appropriate flood mitigation measure and surface water discharge rates.

Representation IDs: 1518, 3967, 3982, 4958, 5380, 6206, 6832, 6833, 6897, 7195, 8152, 13199, 17238, 20585, 21183, 23479, 23837, 24278,27477, 28629, 29745

ST6/H: Aire View Infants, Elliott Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SI6/H: Aire View Infants, Elliott Street	17	5	5	7	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Overall level of development • Impact on local infrastructure/services • Impact on the highway network • Impact on character • Development of Green Belt land • Retention of existing building • Housing mix and mix of uses • Site access • Sustainability • Design and layout • Proximity to designated heritage asset • Location of development • Deliverability • Proposed yield • Flood risk/drainage	. The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1091 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Overall level of development: • Objection to the proposed level of housing growth for Silsden (580 in addition to the 300 plus homes already being developed or approved). Considered to be unfair. • Impacts of developments under construction had yet to be felt within the community.
2. Impact on local infrastructure/services: • Ability and availability of local infrastructure to support/cope with further growth was questioned, and had not been considered when drawing up the Local Plan. • Rail services overcrowded, whilst difficulties are experience access the railway station. • Capacity constraints at the local health centre and the new school. • Level of social housing to be provided queried.
3. Impact on the highway network: • The local highway network was considered to be congested in a several places – Kirkgate and the roundabout on the Aire Valley Trunk Road – causing delays in getting into and out of, as well as through Silsden. • Objections to the lack of provision on the Plan's mapping for a bypass. • Main road through the town considered dangerous.
4. Impact on character: • Concern regarding the impact of development on the character of Silsden and its surrounding green spaces as well as on nature and local residents.
5. Development of Green Belt land: • Objection to development of Green Land. It should not be used. • Sufficient brownfield sites available with abandoned or used buildings that should be considered first. • Suggest that unoccupied dwellings should be brought back into use. • Keighley town centre proposed as suitable location for affordable housing.
Support:
1. Retention of existing building:

	• Considered that the existing building should be retained and converted sympathetically as it forms part of the local character**.**
2.	**Housing mix/mix of uses:** • Suggested that the site should be developed for sheltered housing, supported accommodation, homes for persons of limited mobility, smaller homes for those looking to downsize, affordable housing or self-build housing. • Use of a community land suggested as a potential means of developing it. • Specific suggestion made regarding the number of dwellings to be provided – 14 sheltered apartments in a converted school building and 6 new builds for persons of limited mobility on the nursery playground. • Suggested that the existing building fronting onto Aire View could be re-purposed into a project/social room for residents.
3.	**Site access:** • Opportunities exist to access the site from Elliott Street or Aire View including the provision of separate pedestrian and cycle accesses. • Parking should only be provided on the western playground area. • Traffic and access onto Elliott Street should be addressed.
4.	**Sustainability:** • Site's central location was viewed as a benefit together with its proximity to shops and bus services. • Suggested that a new bus shelter and layby could be provided on Elliott Street to address an existing issue.
5.	**Design/layout:** • Suggested that any development could incorporate rainwater harvesting, community heating system or solar PV, together with the provision of planting and or a garden along the Elliott Street frontage.
6.	**Proximity to designated heritage asset:** • Site adjacent to the Leeds & Liverpool Canal Conservation Area. Development could harm elements that contributes to its significance. • Reference in the Plan to the Conservation Area as a constraint and the need to consider retention and conversion of the existing school building welcomed. • Reference in the Plan to the need to take account of the Conversation Area's setting welcomed. • Consideration should be given to whether any of the buildings/structures on the site should be classed as non-designated heritage assets.
7.	**Location of development:**

- Future development should take place on towns and the city where there are derelict sites and empty retail units.
- Considered that creative planning in those areas would regenerate run-down high streets and provide housing close to infrastructure.

Comments:

1. **Housing mix/mix of uses**:
   - Given its location, close the town centre and bus routes, the site was suggested for sheltered housing or supported living accommodation, meeting a need within the community and potentially offering an increased yield.
   - Any remaining land should be developed as a community garden.
   - Part of the school buildings should be used as social hub for the community.
2. **Deliverability:**
   - Site would be available in short to medium term due to the opening of the new primary school.
3. **Proposed yield:**
   - At the proposed density the estimated yield was considered to be high as the existing buildings are of historic interest and considered for retention.
   - Reduction in yield would potentially require addition sites to allocated elsewhere in Silsden (even before any additional uplift was considered)
   - Suggested that SHLAA sites SI/003 and SI/004 would preferable to several of the proposed preferred allocations to address this.
4. **Flood risk/drainage:**
   - The site is located with Flood Zone 1 (FZ1).
   - Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 1519, 1968, 4743, 6207 ,6834, 7196, 8095, 13200, 20586, 21184, 23480, 23718, 24279, 27478, 28630, 29411, 29746

SI7/H: Hothfield Infant School, Norton Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SI7/H: Hothfield Junior School	21	10	10	7	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Housing mix and mix of uses • Retention of community facility • Design and layout of development • Overall level of development • Impact on local infrastructure/services • Impact on the highway network and site access • Impact on character • Development of Green Belt • Use of brownfield land • Retention and reuse of existing school buildings • Community swimming pool should be retained • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1092 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Housing mix:**
   - Apartments should be preferred on the site, rather than houses. Area cannot accommodate 22 extra houses together with the additional cars and people that would result.
   - Parking problems would become an issue, whilst more cars would be dangerous to children. Parking and narrow streets are an issue in the surrounding area.
   - Queried who would occupy the proposed dwellings.

- Site would be supported if the existing buildings were converted to sheltered housing, allowing elderly people to downsize and providing disability accessible homes. Doing so would allow the proposed yield to be met.

2. Retention of community facility:

- Site would be supported if the existing swimming pool, adjacent classroom, parking and green space fronting Hothfield Road were to be retained.

3. Design/layout of development:

- Suggestions were put forward for addressing the management of water, drainage and flood risk in the area provision of underground water storage on the playground with parking on above), on-site electricity generation (incorporation of solar PV into design and shared heating system), and addressing site access/traffic issues.
- The site's proximity to the town centre, which would encourage walking was noted

4. Overall level of development:

- Proposed level of housing growth for Silsden (580 dwellings in addition to 300 plus being developed or approved) was viewed as being unfair. The town has had more than enough housing and/or housing estates.
- The impact of developments currently under construction in Silsden had yet to be felt within the community.

6. Impact on local infrastructure/services:

- Ability and availability of local infrastructure to support/cope with further growth was questioned, and had not been considered when drawing up the Local Plan.
- Rail services overcrowded, whilst difficulties are experience access the railway station.
- Capacity constraints at the local health centre and the new school.
- Level of social housing to be provided queried.

7. Impact on the highway network:

- The local highway network was considered to be congested in a several places – Kirkgate and the roundabout on the Aire Valley Trunk Road – causing delays in getting into and out of, as well as through Silsden.
- Objections to the lack of provision on the Plan's mapping for a bypass.
- Main road through the town considered dangerous.

8. Impact on character:

- Overall level of development would impact on the character of Silsden and its surrounding green spaces as well as on nature, agricultural land and local residents.

9. Development of Green Belt: • Green Belt land should not be used for development • There are sufficient brownfield sites with abandoned/used buildings that should be considered first, including bring empty/unoccupied dwellings back into use. • Keighley Town Centre was considered as an appropriate location for affordable housing provision.
Support:
1. Use of brownfield land: • Site was supported as it would re-use a brownfield site and represent a good use it.
2. Retention/reuse of existing school buildings: • The school buildings should be retained, and could be considered as a non-designated heritage asset. • References to the retention/conversion within the plan was welcomed • Any conversion/rebuild should be carried out sympathetically to maintain the area's distinctive character.
3. Housing mix: • Given its location the site may be suitable for accommodation for elderly residents who wish to downsize and remaining living locally. • Another suggestion was that site be considered for supported accommodation and/or affordable community/self-build housing, potential via a Community Land Trust or development by the local authority.
4. Retention of existing community facility: • The community swimming pool should be retained for future public/community use, with the site boundary being amended to exclude it and an adjacent classroom.
5. Impact on highways/access: • Traffic and access onto Elliott Street should be addressed.
Comment:
1. Housing mix/mix of uses: • Due to its location close to the town centre and bus routes, the site should be specifically allocated for sheltered housing or supported living accommodation for the elderly. • This would meet a local need within the community and could provide a higher potential yield.

• Any remaining sections of the site should be developed as a community garden. Parts of the existing school buildings should be used as a social hub.
2. Flood risk/drainage: • The site is located with Flood Zone 1 (FZ1). • Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 636, 1521 ,1970, 5366, 6208, 6823, 6835, 6836, 6837, 6847, 7197, 8096, 13201, 20587, 21194, 23481, 23719, 24280, 28631,29412, 29747

SI8/H: Dradishaw Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
SI8/H: Dradishaw Road	17	13	13	0	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Overall level of housing growth • Impact on local infrastructure/services • Impact on the highway network • Provision of employment • Impact on character • Development of Green Belt land • Site access • Impact on amenity • Loss of open/green space • Pending Planning Application • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1080 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Overall level of housing growth:**
   - Proposed level of housing growth for Silsden (580 dwellings in addition to 300 plus being developed or approved) was viewed as being unfair.
   - The impacts of developments, currently under construction in Silsden had yet to be felt within the community.
2. **Impact on local infrastructure/services:**

• Ability and availability of local infrastructure to support/cope with further growth was questioned, and had not been considered when drawing up the Local Plan. • There are capacity issues at the local health centre, the new primary school and dental surgeries. • Parking in the town centre and at railway station limited, whilst bus services no longer serve Leeds Bradford Airport, terminating instead in Ilkley. Rail services experience overcrowding and there is a lack of safe access to the railway station. • Utilities network (water, sewerage, gas, electricity) is not designed to serve the additional home proposed. • The lack of local jobs will mean more commuters being added to already busy roads and increase pollution. • The level of affordable/social housing provision was queried.
3. Impact on the highway network: • The local highway network was considered to be congested in a several places – Kirkgate and the roundabout on the Aire Valley Trunk Road – causing delays in getting into and out of, as well as through Silsden. • Objections to the lack of provision on the Plan's mapping for a bypass.
4. Provision of employment: • Area lacks jobs, which results in more people commuting for work. Would add to traffic on an already busy road network and increase pollution.
5. Impact on character: • The overall level of development would impact on the character of Silsden and its surrounding green spaces as well as on nature, agricultural land and local residents.
6. Development of Green Belt land: • Green Belt land should not be used for development • There are sufficient brownfield sites with abandoned/used buildings that should be considered first, including bring empty/unoccupied dwellings back into use. • Keighley Town Centre was considered as an appropriate location for affordable housing provision. • Housing should, more generally, take place in towns and the city where there are derelict sites and empty shop units. Creative planning in such areas would support regeneration and provide housing close to existing infrastructure.
7. Site access: • Access from Dradishaw Road is an issue.
8. Impact on amenity:

- Development would be incongruous and overbearing to existing properties, as well as being over-development.

9. Loss of open/green space:

- Site is used as a play area/pocket park by local children, and should be retained for this purpose due the lack facilities in the western area of Silsden, or maintained as an amenity area.
- Open Space Assessment suggests that there is a need to increase Natural and Semi Natural green space in Silsden.
- Retaining green space will help to support residents wellbeing and mental health.
- There would also be an impact on wildlife and protected trees.

Support:

No representations received in support

Comment:

1. Pending Planning Application:

- The site was the subject of a pending planning application for six (previously seven) dwellings
- There are a number of outstanding issues and objections to the application including highways/access, loss of green/amenity space, impact on protected trees, and drainage.
- Town Council had objected on similar grounds to the above as well as the loss of open space.
- Any granted of planning permission would demonstrate suitability, however the development of green space does not appear to be an appropriate housing allocation, particularly in the light of other sites that are deemed suitable. It should not be a preferred option.

2. Flood risk/drainage:

- The site is located in Flood Zone 1 (FZ2). There was concerns relating to flooding and its location adjacent to an ordinary watercourse.
- Guidance was provided regarding appropriate surface water discharge rates, flood mitigation measures and the need to maintain access to the river bank.

Representation IDs: 1237, 1522, 1978, 3984, 4744, 6209, 6838, 7198, 8097, 13202, 20580, 21182, 23482, 24281, 27479, 28632, 29748

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 113 within the consultation document.

Summary of Consultation

Consultation Question 113 – Silsden Preferred Site Allocations

A total of **9** representations were received in relation to Question 113 from **9** respondents. Respondents included Highways England, local residents, a countryside charity and a housebuilder. **Table 0.4** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.5**.

Table 0.4: Consultation Question 113: Silsden Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q113	7	4	4	1	2

Table 0.5: Consultation Question 113 - Silsden Preferred Site Allocations - Summary of Representations Received

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local infrastructure/services • Proposed site allocation SI3/H • Proposed site SI8/H: Dradishaw Road • Inclusion of greenfield sites • Overall level of housing growth • Non-inclusion of SHLAA site SI/003 • Non-inclusion of SHLAA site SI/004 • Impact on the highway network • Amendment to the settlement boundary	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. .

Summary of Representations
Objections
1. Impact on local infrastructure/services: • Infrastructure should be provided in advance or in parallel with new development, not afterwards. This includes upgrading utilities (sewers, electricity supply, water supply) and highway networks, improving footpath routes and providing a new bridge to reach the railway station. • Medical centre would not be able to cater for more patients • The road network was considered to be at capacity, in particular the junction between Elliott Street and Keighley Road. • The ability of the sewerage network to accommodate new homes was questioned.
2. Proposed site allocation SI3/H: • Development would result in the loss of high quality dairy fields as well as wildlife. • It would also result 300 additional vehicles using the already congested Elliott Street, turning onto Keighley Road. This road serves a number of community facilities. As such development should not happen under any circumstances. • Site access is a key issue.
3. Proposed site SI8/H: Dradishaw Road: • Site should be retained as a urban pocket park for local children to use as a play area, and was considered to have special value to the community.
4. Inclusion of greenfield sites: • Objection to the number of greenfield sites proposed (3 – SI2/H, SI3/H and SI4/H) within Silsden compared to the number of brownfield ones (1 – SI5/HC). • Sites at the southern point of the settlement as well as those at the northern point should be returned to the Green Belt. • Not accepted that the proposed level of greenfield allocations is necessary to accommodate the proposed level of growth. • The proposed densities on the sites in Silsden, include site SI5/HC, was considered to be lower than expected. This should be increased and the size of the greenfield allocations reduced accordingly.
5. Overall level of housing growth:

Summary of Representations
• The number of developments with planning permission or under construction has not been taken into account when preparing the Local Plan, or had been granted since publication. • 36 dwellings on a previously development site as well as those on smaller infill sites were not shown as part of the site allocations. Specific reference was made to a recent planning permission for 40 dwellings on The Willows site together with a pending planning application for 20 dwellings at Town Head. • These dwellings would contribute to the load being placed on local infrastructure. Green spaces and flood storage should be provided within or adjacent to these developments. • The Plan was considered to be out of date based on the above, meaning that any new applications should be examined against emerging and existing policy, with level of future allocations being substantially reduced.
6. Non-inclusion of SHLAA site SI/003: • Three fields to the east of the new primary school within SHLAA site SI/003 should be allocated within the Local Plan. • The site should be allocated as it is within the settlement boundary and would be consistent with the Government's White Paper "Planning for the Future" (2020) and 25-year "Environment Plan".
7. Non-inclusion of SHLAA site SI/004: • Proposed site SI2/H should be extended to include the full extent of SHLAA site SI/004 and the northern most section of rejected site SI/003. • SI/004 was shown in the Council's Evidence Base to be unconstrained, and outside the Green Belt and within the settlement boundary. • The wider 12.27ha site should be allocated for 260 dwellings. It would provide a suitable, available and deliverable extension to site SI2/H. • Would allow the area to be comprehensively masterplanned to reflect the area's opportunities and constraint and deliver wider benefits as well as the creation of a new eastern defensible settlement boundary.
Support
No representations received in support
Comments
1. Impact on the highway network: • Development in Silsden would not on its own have a severe impact on the Strategic Road Network.

Summary of Representations
• It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
2. Amendment to the settlement boundary: • The settlement boundary should be redrawn to permanently exclude rejected site SI/003 from further consideration for development.

Representation IDs: 867, 1235, 5157, 5472, 15502, 17099, 17239, 29740, 30076, 30214, 30216, 30217

2.83 STEETON WITH EASTBURN

Introduction

sustainable locations and is accessible to higher order settlements. As such it will help make a significant contribution of the meeting the District's housing needs, employment and providing supporting community facilities. Based on this it is proposed that the settlement has a housing target of 175 dwellings and accommodates 2.68ha of employment land. A total of five site allocations (4 residential and 1 employment) were proposed to deliver these development requirements.

Portrait & Local Area Strategy

The Local Plan provides a portrait of the Steeton with Eastburn's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as question 114 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **13** representations were received in relation to the Steeton with Eastburn portrait and Local Area Strategy (Question 114) from **12** respondents. Respondents included Highways England, local residents, the NHS, a housebuilder, a Member of Parliament and a Ward Councillor. **Table 0.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.2**.

Table 0.1: Consultation Question 114: Steeton with Eastburn Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
114	Steeton with Eastburn Portrait & Local Area Strategy	13	12	8	1	4
	Totals	**13**	**12**	**8**	**1**	**4**

Table 0.2: Steeton with Eastburn Portrait & Local Area Strategy - Summary of Representations Received

Steeton with Eastburn Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
114	Steeton with Eastburn Portrait & Local Area Strategy	13	12	8	1	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on local infrastructure/services • Impact on character and community • Impact of site ST1/H • Impact on heritage and open space • Proposed green corridor • The plan should include a policy on Airedale Hospital • Impact on highway network • Overall level of housing growth and distribution • Local Area Strategy Map	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy ST1: Steeton, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. Development on Green Belt land: • Would be contrary to Government policy set out in the NPPF.

Summary of Representations
• The use of suitable brownfield sites should be maximised before considering changes to Green Belt boundaries. It was viewed that Bradford had a plentiful supply of brownfield that had not been developed. • Insufficient justification was provided to demonstrate that exceptional circumstances existed for development in the Green Belt. It was viewed that such circumstances did not exist. All other reasonable options should to meet housing needs should be considered. • There was also no justification for the proposed housing numbers to warrant the removal of areas of Green Belt. • Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed.
2. Impact on local infrastructure/services: • Inadequate proposals had been presented in the Plan in relation upgrading local infrastructure to support proposed housing and address extra pressures on services. • The junction of B6265 and Station Road was considered to be a “choke point” that would struggle to cope with demands with no improvements proposed. • There was a lack of new retail facilities, no mention of a footbridge over the A629 to provide access to Silsden and • No clear vision to increase passenger capacity on local public transport – contrary to Government Decarbonising Transport strategy priority. • Questioned whether existing facilities (education, health, shopping) were robust enough. Local health care highlighted as being unable to keep up with demand.
3. Impact on character and community: • Recent development on greenfield sites had harmed the semi-rural character of the area and put pressure on services and roads, with no additional investment infrastructure following construction. • Local Area Strategy did not seem to benefit the community. It was also considered vague and aspiration, with exception of the housing element. • The villages were viewed as being constrained by that been enlarged despite this resulting in it being overload. • Felt to be environmentally irresponsible to impose more housing and that mental health should not be set aside for more development.
4. Impact of site ST1/H:

Summary of Representations
• Development would increase the number of cars on an already congestion road network. The access to/egress from the site would cause issues. • It would also add capacity issues onto the existing sewerage system.
5. Impact on heritage and open space: • Recent developments had failed to conserve and enhance key heritage assets. • The aim of protecting and enhancing existing open spaces was considered to be at odds the proposed housing density.
6. Proposed green corridor: • The clough through which Steeton Beck flows should be identified as an area worthy of “green protection” due its mature woodland, birds and plants as well as the presence of public footpath. • Could have potential to be extend further into the village and to the rear of properties at Whitley Head.
7. Hospital: • The plan should include a specific policy related to Airedale Hospital. It would provide in principle support for certain key parameters relating to its redevelopment and expansion/improvement of facilities during the plan period. • Details about the hospital’s operation in the draft plan should be updated.
Support
1. Hospital: • Acknowledgement within the plan of the existing hospital structural issues and general to develop a new hospital was supported. • The support for potential development of the hospital in the Local Area Strategy and Plan was also welcomed.
Comments
1. Impact on highway network: • Development in Steeton and Eastburn would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
2. Overall level of housing growth/distribution: • The proposed housing distribution, particularly in relation to the Regional City was considered to unrealistic due to deliverability and viability challenges.

Summary of Representations
• The level of growth assigned to the Regional City should be reduced with additional dwellings distributed to the Principal Towns and Local Growth Centres, where there are not deliverability constraints and delivery would be realistic. • 35% uplift should also be applied.
3. Development of Green Belt land: • This was opposed. • It was considered brownfield land should be developed first, before Green Belt.
4. Impact on local infrastructure/services: • Further retail was required in order to boost the settlement's sustainability by making it easier to access services without the need to travel out of the area. • Need to work with North Yorkshire County Council to address the impacts of Cross Hills level crossing, poor transport infrastructure, housing needs, landscape impacts, and primary and secondary education capacity/provision as well as capacity of Marley Waste Water Treatment Works and other utilities.
5. Local Area Strategy Map: • Does not include recent developments and as such misrepresenting the housing density in Steeton and Eastburn.

Representation IDs: 302, 478, 1058, 1586, 1880, 5134, 7949, 15503, 17659, 19828, 19829, 24284, 28253

Sites

As highlighted above, five sites were put forward in the Preferred Options document to meet the proposed development requirements for Steeton with Eastburn (4 for residential and 1 for employment). Under Q115 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **64** representations were received in relation to policies ST1/H to ST5/E from **53** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents and a Ward Councillor. **Table 0.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in

Table 0.4.

Table 0.3: Steeton with Eastburn Proposed Sites (ST1/H to ST5/E) – Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
ST1/H: Summerhill Lane	33	30	29	2	2
ST2/H: Aireburn Avenue	11	11	8	1	2
ST3/HC: West of Green Lane	8	8	5	1	2
ST4/H: Rear of Holly Fold	8	8	5	0	3
ST5/E: Lyon Road	4	4	2	0	2
Totals	**64**	**53**	**49**	**4**	**9**

Table 0.4: Steeton with Eastburn Proposed Sites (ST1/H to ST5/E) - Summary of Representations Received

ST1/H: Summerhill Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
ST1/H: Summerhill Lane	33	30	29	2	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on surrounding area/community • Impact on local infrastructure/services • Impact on the highway network • Site access • Development of Green Belt land • Housing density • Alternative proposal • Impact on wider environment and biodiversity • Flood risk/drainage • Housing mix • Landscape and visual impacts • Proximity to Steeton Conservation Area • Proposed level of housing growth in Steeton • Site allocation was supported • Impact on agricultural land • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1353 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Impact on surrounding area/community: • Concerns regarding the impact on views from, and amenity neighbouring properties (in particular on Rivock Avenue) and potential for devaluation of property, as well as mental health and the wider community. • The loss of fields and trees should not take place as they are beneficial for health, whereas housing was not. • The adjacent lorry park was noted as were noise impacts resulting during/after construction.
2. Impact on local infrastructure/services: • Infrastructure had not been taken into account in drawing up the Local Plan, with inadequate proposals being presented in relation to upgraded to support additional growth. • Steeton does not have the infrastructure to sustain more people and vehicles. • Further strain would be placed on schools, which lack of facilities to accommodate more children. • GP/dental services were over-subscribed and struggle to cope, whilst the hospital is under pressure. • Shops and policing were viewed as limited. • Direct access to the railway station not guaranteed as it may need third party private land. • Plan lacks a clear vision for increasing passenger capacity on public transport, contrary to the Government's Decarbonising Transport strategic priority. • The Aireburn Avenue area experiences issues with water pressures, that would be exacerbate and should be addressed
3. Impact on the highway network: • Would add to traffic levels on local highway network, which is already congested and seeing more traffic from recent developments. The network would need to change to accommodate development. • Concerns were expressed about the impact on the B6265/Station Road junction, as well as the pedestrian safety when crossing the Steeton/Silsden roundabout. • More traffic would increase risks to pedestrians.
4. Site access: • Access would be onto a busy main road and close to a blind bend to east. There are issues on this road with speeding vehicles. It would suffer limited/poor visibility.

Summary of Representations
• Due to a difference in levels the site access road would be on steep incline. • Summerhill Lane and Station Road were viewed as unsuitable to support development.
5. Development of Green Belt land: • Considered to be contrary to national planning policy as well as local policies on Green Belt, achieving Net Zero Carbon and the Climate Emergency Declaration. • No evidence had been put forward justifying the “exceptional circumstances” for amending Green Belt boundaries. • The use of brownfield land should be maximised first, of which there were numerous examples across the District. All reasonable options for meeting for meeting housing needs should be fully examined. • Development would encroach into the countryside and impact on the integrity of settlement boundaries and result in a risk of urban sprawl, whilst the strategic between Steeton and Keighley would be reduced. • There would also be a loss of character, natural views, habitats and wildlife as well as more pollution. • Green Belt and green belt should be retained and integrated into the Green Infrastructure network.
6. Housing density: • Density of the proposed Green Belt site allocations were much lower than expected/required under Policy HO2. • It was not accepted that the proposed level of greenfield allocations is necessary to support the development outlined in the Local Plan. • It was suggested that densities are increased and the size of the Green Belt/greenfield allocation reduced.
7. Alternative proposal: • The adjacent lorry park should be incorporate as part of a smaller housing site (excluding much of the proposed site) that would round off the settlement. It would also address access issues from Station Road.
8. Impact on wider environment and biodiversity: • Development would result in loss of (and impacts on) wildlife and habitats. A range of bird and animal species are present on the site. • An HRA should be submitted as part of any future planning application. • Green Belt sites should be saved with trees and hedgerows being conserved.
9. Flood risk/drainage:

Summary of Representations
• The site is prone to flooding regularly in places leading to standing water and drainage problems. • Development should not take place on flood plain/flood risk areas, meaning the site should not be developed. • Flood water displaced as a result of development would result in problems elsewhere.
10. Housing mix: • Due to topography, it was suggested that single storey dwellings should be provided at the western edge. This would reduce visual impact. • 120 dwellings were considered to be too many, whilst modern dwellings with off road parking would not be a suitable fit for the area. • New developments lacked bungalows despite there being an aging population that require them • The proximity of the railway line and A629 will restrict the type and price of homes that may be provided.
11. Landscape and visual impacts: • The site is located on the edge of the settlement. Development would change the landscape and have visual impacts. • It would also in result in a loss of character. • It was noted that a sensitively designed development, at a reasonable density would be acceptable. • However, it was felt development not be in keeping with character of the surrounding area.
12. Proximity to Steeton Conservation Area (CA): • Concerns were expressed regarding negative impacts on the CA and its setting. • Development would be inappropriate and not in keeping with the CA. • Suggested that CA should be expanded to include part of the site. • An assessment should be undertaken before allocation of the site's contribution towards those elements that contribute towards the CA's significance and the impact that development would have.
13. Proposed level of housing growth in Steeton: • Considered to be unfair and unjustified, with no evidence provided to support the level of housing need and the release of land to deliver it. • No justification demonstrating that the proposed housing numbers warranted the removal of areas of Green Belt. All other options should have been explored.

Summary of Representations

- Noted that a developer brochure should the site accommodating 190 dwellings rather 120 as set out in the Local Plan.

Support:

1. **Proposed amendment to site's northern boundary**:
   - Site allocation was supported.
   - The adjacent lorry park was considered to have potential for employment use/commercial development.
   - The northern boundary of the site should be moved south to ensure the lorry park area was not too narrow for development

2. **Proposed amendment to site's eastern boundary:**
   - Site allocation was supported.
   - The eastern boundary should be amended to include the full extent of SHLAA site ST/001. This would allow 190 dwellings, open space and infrastructure to be provided, in a sustainable location.
   - The proposed and rejected sites performed similarly in respect of the SA and Green Belt Assessment. Issues raised in assessment could be addressed. It would deliver housing and positive effects.

Comments:

1. **Impact on agricultural land:**
   - Site may be BMV land, which should be safeguarded as a key resources.
   - Agricultural Land Classification (ALC) survey should be undertaken to determine its ALC grade to inform the SA and future masterplanning.

2. **Flood risk/drainage:**
   - Parts of the site are located with Flood Zones 2 (FZ2) and 3b (FZ3b).
   - No development should take place in FZ3b unless water compatible or essential.
   - Development should follow a sequential approach to prevent un-necessary development in FZ2 & FZ3b.
   - Guidance provided on appropriate flood mitigation measure and surface water discharge rates.

Representation IDs: 300, 373, 427, 1052, 1110, 1452, 1512, 1525, 1585, 1715, 2146, 2195, 2265, 2270, 2363, 2695, 2787, 3374, 4026, 4341, 5147, 5484, 6441, 6908, 7199, 7945, 17492, 19901, 24286, 28254, 28621, 29414, 29525

ST2/H: Aireburn Avenue

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
ST2/H: Aireburn Avenue	11	11	8	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local infrastructure/services • Impact on the highway network • Site access • Impact on the wider environment • Impact on amenity • Proposed density and level of development • Development of greenfield/Green Belt land • Impact on landscape character • Flooding/drainage • Proximity to the Conservation Area	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1135 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:

1. **Impact on local infrastructure/services**:
   - Infrastructure had not been taken into account in drawing up the Local Plan.
   - Steeton does not have the infrastructure to sustain more people and vehicles.
   - Roads are congested and the schools are full. There are also difficulties in getting GP appointments.
   - Aireburn Avenue experiences issues with water pressures, that would be exacerbate and should be addressed

2. Impact on the highway network: • Site is on a busy main road and close to a busy junction. • Issues experienced with school parking. • Development will result in increased traffic at the B6265/Station junction.
3. Site access: • The location of the site access has been wrongly identified in the plan document. It should be at the site's north west corner rather the north east corner.
4. Impact on the wider environment: • No consideration given to the impact on the environment. Potential loss of wildflower meadow.
5. Impact on amenity: • Development would have negative impacts on Aireburn Avenue's residents e.g. from noise and dust.
6. Proposed density/level of development: • 22 dwellings are considered to be too high a density and out place with surrounding housing. • Steeton & Eastburn viewed as being saturated by development.
7. Development of greenfield/Green Belt land: • Site is greenfield/Green Belt and should not be used for development. • Sufficient brownfield sites including abandoned buildings/unused warehousing that should be used first. • Issue of un-occupied properties and bringing them back into use was raised.
Support:
No representations received in support
Comments:
1. Impact on landscape character: • Site located in steeply sloping area. • Development would affect landscape character and represent overdevelopment.
2. Flooding/drainage:

• The site located in Flood Zone 1 (FZ1). • Guidance provided on appropriate flood mitigation measure and surface water discharge rates.
3. Proximity to the Conservation Area: • Site located 150m to east of Steeton Conservation Area. • Development would be unlikely to impact upon its setting. • References to the Conservation Area in the site pro-forma welcomed.

Representation IDs: 374, 426, 1051, 1587, 2271, 2365, 2798, 7200, 24287, 28622, 29415

ST3/HC: West of Green Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
ST3/HC: West of Green Lane	8	8	5	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Impact on local infrastructure/services • Impact on the environment and trees • Site access • Outline planning permission • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1136 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Development of Green Belt/greenfield land: • Objection to the use of greenfield/Green Belt land. • The use of brownfield sites should be maximised first and unoccupied dwellings should also be brought back into use. • No exceptional circumstances demonstrating why the site had been considered. It was also an inappropriate use of the land.
2. Impact on local infrastructure/services: • Concerns over impacts on local infrastructure including roads, doctors, sewage and traffic as a result of development. • Infrastructure had not been considered when drawing up the plan.

• Specific reference was made to existing issues with the sewage network and its capacity to cope, particularly following the completion of the Miller Homes development, with further growth. • It was also queried whether any social housing would be provided.
3. Impact on the environment and trees: • No consideration given to the impact on the environment. • The site contains 30 trees that are subjected to TPOs. • The site is last open greenfield site in the village not in the floodplain or used as farm land. • Felt to provide vital support for wildlife and hosts a number of ancient trees. • Adjoining fields were noted as being waterlogged.
4. Site access: • The proposed entrance (via an old people's home and industrial estate) was viewed as being far from ideal.
Support:
1. Site access: • The proposed allocation was supported. • The outline planning permission should be amended to move the vehicle access to eastern edge of the site – via the Miller development and across Green Lane from the permitted point from Main Road. It would be safer and discourage crime.
Comments:
1. Outline planning permission: • The site benefits from outline planning permission.
2. Flood risk/drainage: • Site located within Flood Zone 1 (FZ1). • Guidance provided on appropriate flooding mitigation measures and surface water discharge rates that would be required.

Representation IDs: 298, 1053, 2018, 5898, 7201, 7946, 24288, 28623

ST4: Rear of Holly Fold

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
ST4/H: Rear of Holly Fold	8	8	5	0	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Impact on local infrastructure/services • Site access • Site specific issues/constraints • Impact on landscape character • Flood risk/drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant full planning permission.

Objections:
1. Development of Green Belt land: • Objections received to the site on grounds that it is Green Belt, and as such should not be developed. • Proposed densities on Green Belt sites were lower than those set out in emerging policy HO2. • The site should revert to Green Belt.
2. Impact on local infrastructure/services: • No consideration was given to impacts on local infrastructure – roads, doctors, sewage, increased traffic - when drawing up plans. • It was queried what level of social housing that would be provided.
3. Site access: • Concerns about the access from Sutton Lane.

- It is viewed as being a dangerous road due to lack of pavements. Increased traffic would make it more dangerous.
- It is used by pedestrians to access nearby schools and the hospital.

4. Site specific issues/constraints:

- There were several costly issues that a small housing development could not attempt to overcome – power lines to go underground, numerous active springs and impossibly steep gradients.

Support:

No representations received in support

Comment:

1. Development of Green Belt land:

- Site is Green Belt as such should be protected from development.
- It would be contrary to Government aims and objectives, and has the fundamental aim of preventing urban sprawl by keeping land permanently open.
- The use of suitable brownfield sites should be maximised before changes to Green Belt boundaries are considered.
- There should be exceptional circumstances before the boundaries can be amended.

2. Impact on landscape character:

- Site located in steeply sloping area.
- Development would affect landscape character and represent overdevelopment.

3. Flood risk/drainage:

- The site is located with Flood Zone 1 (FZ1).
- Guidance was provided on appropriate flooding mitigation measures and surface water discharge rates that would be required within any future development.

Representation IDs: 299, 1054, 1056, 1111, 7202, 8171, 24289, 28624,

ST5/E: Lyon Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
ST5/E: Lyon Road	4	4	2	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Parking provision • Proximity to and impact on heritage assets • Flood risk/drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1119) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:
1. Parking provision: • Concerns about the impact of development on parking in the surrounding area. • Already limited provision for existing residents in the Green Lane area.
2. Proximity to/impact on heritage assets: • Two Grade II Listed Buildings are located 40 metres to the east of the site's south east corner, neither of which were highlighted in the site proforma. • Development could harm elements that contribute to the significance of these assets.

• The plan should be clear that proposals should ensure that these assets, and the elements that contribute to their significance are not harmed.
Support:
No representations received in support
Comment:
1. Flood risk/drainage: • The site is located in Flood Zone 2 (FZ2). There was concerns relating to flooding and its location adjacent to an ordinary watercourse. • Development should follow a sequential approach layout to prevent un-necessary development in FZ2, where possible. • Guidance was provided regarding appropriate surface water discharge rates, flood mitigation measures and the need to maintain access to the river bank.

Representation IDs: 1652, 24285, 28620, 29413

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 115 within the consultation document.

Summary of Consultation

A total of **7** representations were received in relation to Question 115 from **4** respondents. Respondents included Highways England, local residents, the NHS and a housebuilder. **Table 0.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 0.6**.

Table 0.5: Consultation Question 115: Steeton with Eastburn Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q115	7	4	4	1	2

Table 0.6: Consultation Question 115: Steeton with Eastburn Preferred Site Allocations - Summary of Representations Received

Question 115 – Steeton with Eastburn Preferred Site Allocations

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt land • Proposed amendment to Green Belt boundary • The plan should include a policy related to Airedale Hospital • Support for proposed site ST1/H • Impact on the highway network • Provision of employment land	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

Summary of Representations
Objections
1. Development of Green Belt land: • Would be contrary to Government policy set out in the NPPF. • The use of suitable brownfield sites should be maximised before considering changes to Green Belt boundaries. It was viewed that Bradford had a plentiful supply of brownfield that had not been developed. • Insufficient justification was provided to demonstrate that exceptional circumstances existed for development in the Green Belt. It was viewed that such circumstances did not exist. All other reasonable options should to meet housing needs should be considered. • There was also no justification for the proposed housing numbers to warrant the removal of areas of Green Belt. • Reference was made to a High Court judgement in respect of the inclusion of Green Belt sites in the Leeds Site Allocations Plan. It was considered that this was relevant to Bradford. Further references made to 2020 Government announcements on making it easier to build on brownfield land. As such Green Belt should not be developed.
2. Proposed amendment to Green Belt boundary: • Green Belt boundary should be amended to remove the curtilage of two properties to the south of Chapel Road. Their inclusion within the Green Belt was at odds with the approach to defining Green Belt boundaries. The land does not contribute to its aim or purposes.
3. Hospital: • The plan should include a site specific policy related to Airedale Hospital. It would in principle support for certain key parameters relating to its redevelopment and expansion/improvement of facilities during the plan period. • Details about the hospital's operation in the draft plan should be updated.
Support
1. Proposed site ST1/H: • The proposed site allocation was supported • It was considered a larger site commensurate with the full extent of SHLAA site ST/001 should be included. It would score equally in terms of the Green Belt Assessment and Sustainability Objectives.
Comments

Summary of Representations
1. Impact on the highway network: • Development in Steeton and Eastburn would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
2. Provision of employment land: • The existing lorry park adjacent to the railway should be allocated for employment purposes, with, if necessary, land to the south. This may impact on the proposed housing allocation.

Representation IDs: 301, 479, 1057, 15504, 17070, 17666, 19830

2.84. ADDINGHAM

Introduction

The Local Plan settlement hierarchy identifies Addingham as one of Bradford District's 11 Local Service Centres. Based on this it is proposed that the settlement has a housing target of 175 dwellings. A total of eight site allocations were proposed to deliver the development requirements.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Addingham characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, the green infrastructure links through the village and safe and active travel routes to neighbouring areas. This was listed as question 116 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Councils website.

Summary of Consultation

A total of **184** representations were received in relation to the Addingham Local Area Strategy from **163** respondents. Respondents included Highways England, Historic England, local residents, local interest groups, land/site promoters, and the Parish Council. Table **84.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in Table **84.2**.

Table 84.1: Consultation Question 116: Addingham Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
Q116	Addingham Portrait & Local Area Strategy	184	163	170	2	12
	Totals	**184**	**163**	**170**	**2**	**12**

Table 84.2: Summary of Representations Received - Addingham Portrait & Local Area Strategy

Addingham Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
Q116	Addingham Portrait & Local Area Strategy	184	163	170	2	12

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objections to level of housing growth, sites and density • Impact of development on Green Belt land • Concerns regarding local infrastructure and services • Impact on heritage • Loss of greenspace • Flood risk, surface waste flooding and drainage • Habitats and wildlife impact • Transport and travel • Employment • Support for housing, drainage, environment and transport	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy AD1: Addingham, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. Level of housing growth, sites and density: • The Housing requirement- too many houses proposed for the size of the village as a local service centre without justification

- The percentage increase relative to the existing size of the village. A 10% increase in the total number of houses in the village- Addingham's growth is also higher than Ilkley (only 4.2%), Keighley and Bingley, and also less than Bradford City (growth 9.3%) which will be "the prime focus of new housing development" within the area - the average is 5.38%
- Ilkley as a principle town in Wharfedale should receive proportionately more homes as it has more facilities, public transport options and better infrastructure
- Questions over why there are now 181 proposed dwellings from the 75 originally proposed in the 2019 consultation
- The housing density on the sites proposed is considered too high
- Development of larger housing sites not supported
- The majority of the sites proposed are too far from the village amenities and not accessible by walking/cycling

2. Development on Green Belt land:

- Impact on the Green Belt- specifically urban sprawl, impact on openness and countryside encroachment - no exceptional circumstances have been demonstrated as there are sufficient brownfield sites in alternative areas

3. Local infrastructure/services:

- Impact of number of homes proposed on insufficient local infrastructure with no plan to improve existing facilities
- The village has one oversubscribed single form entry primary and Ilkley Grammar is oversubscribed. Cumulative impact from over 1400 new homes in Wharfedale on school capacity in the area
- Adverse impact the new houses on supporting infrastructure and river water quality. The combined sewage and drainage system is already overwhelmed and proposed new development will make matters worse and negatively impact water quality
- Lack of public transport option and limited local employment opportunities mean developments will be car dependent to access employment/services. Limited local bus connections with nearest train station located in Ilkley
- Impact of proposed development on the local highway network/road safety and impact on congestion. Main Street is too narrow with parking and insufficient parking options causing congestion. Local secondary streets will not support the additional traffic caused. Impact of additional traffic on road safety for pedestrians, in particular school children walking to school.

4. Heritage and open space:

- Impact on footpaths, in particular the Dales Highway, the Dales Way

- The loss of greenspace and impact on local heath
- The impact of proposed developments on the unique local village character/conservation areas- in particular loss of open land at Soldiers Fields south of Main street and key open spaces on the gateway to the village to the west.
- Impact on landscape character and the adjacent Yorkshire Dales National Park/ and Nidderdale Area of Outstanding National Beauty, and loss of open green setting of the village and key view views over the open fields towards Beamsley

5. Flood Risk:

- Impact of proposed development on local flood risk, in particular surface water flood risk.

6. Habitats & Wildlife:

- Habitats- impact of proposed levels of development on the South Pennine Moors SPA/SCA, and the North Pennine Moors SPA/SCA;
- Impact of proposed development on protection of local ecology, biodiversity and wildlife, in particular loss of greenfield sites in and around the village

Support

1, Housing

Agree with the suggested requirement for 175 houses for Addingham during the plan period.

- recognise that some, limited, new housing will support the aims of safeguarding local services
- Support for strategy but concerns relating to housing numbers and impact on green belt.

1. Drainage

Support for the protection of open space especially where there are opportunities to improve wildlife value and to create zones for natural flood water management and Sustainable urban Drainage Systems (SuDS)

2. Environment

Support for the status of the village in the hierarchy and the intention to protect and enhance green infrastructure links
support for improving footpaths and biodiversity in the Southfield “green wedge”.

3. Transport

- Support for the creation and improvement of safe travel routes for walking and cycling both to village centre facilities and through village neighbourhood

Comments

1. **Overall level of housing growth:**
   - Review the Local Area strategy, to base it on properly evidenced and updated data and to bring it into line with the settlement hierarchy, with a view to reinstating the relative position of Addingham within the hierarchy, as a local service centre, attracting a lower proportion of the district-wide housing growth target provision.
   - Recognise the need for some quality small scale affordable homes
   - Support for 75 homes as set out in the 2019 LPA and Addingham Neighbourhood Plan
   - If housing is granted on Southfield Lane (AD3/H and/or AD4/H) assurances sought that no further erosion of this green wedge takes place and its integrity is permanently protected.
   - Important to achieve a mix of house types to meet the demands and needs of the local population - e.g. starter/affordable dwellings and some catering for special needs (disabled/older/ sheltered); also, some larger family houses.
2. **Heritage & Open Space:**
   - Green and blue infrastructure corridors in the village need protection and enhancement
   - It should be recognised along with the Wharfe and Beck corridors are an important green infrastructure asset for wildlife and people.
   - Comment that the Area Strategy summary only highlights the importance of protecting the landscape to the South of the village; this needs strengthening by stressing the importance of protecting and enhancing the Marchup and Back Beck/Long Riddings corridors, the green entry into the village from the Silsden Road roundabout. This has intrinsic heritage, archaeological and ecological importance with respect especially to its medieval history, the occurrence of ancient species-rich hedgerows and its barn owl population
3. **Employment Development:**
   - In the interests of building a more balanced and sustainable like to see some limited development for new employment in the village as well as for housing
4. **Impact on highway network:**
   - Highways England comment that whilst locating development within Addingham, on their own, will not have a severe impact on the Strategic Road Network (SRN), the wider cumulative impact of the development aspirations within the plan could severely impact the SRN. This cumulative impact will need to be established by the Council and considered by Highways England.
   - Strong support for development of the Wharfedale Greenway
5. **Wildlife:**

- Addingham is located within the zone of influence of the internationally designated South Pennine Moor Special Protection Area for wading birds and is used as foraging ground for species such as curlew and lapwing and despite the barrier created by the A65 road, it links the village to the Street, Lumb Ghyll Wood and Stegholes Local Wildlife Sites and the wider countryside of Addingham Moorside beyond, forming a connection of immense value for both people and wildlife

Representation IDs: 382, 432, 447, 462, 588, 703, 784, 785, 890, 906, 979, 1188, 1222, 1247, 1282, 1399, 1403, 1423, 1492, 1577, 1603, 1617, 1690, 1784, 1843, 1955, 2007, 2019, 2053, 2176, 2186, 2229, 2233, 2252, 2340, 2358, 2412, 2606, 2682, 2689, 2726, 2734, 2760, 2801, 2916, 3063, 3139, 3159, 3303, 3417, 3430, 3471, 3478, 3498, 3499, 3511, 3531, 3559, 3585, 3602, 3624, 3782, 3811, 3822, 3838, 3910, 3946, 4007, 4011, 4036, 4095, 4102, 4126, 4147, 4155, 4224, 4242, 4308, 4315, 4358, 4370, 4428, 4503, 4551, 4650, 4665, 4699, 4863, 4906, 5236, 5415, 5671, 6072, 6074, 6665, 6910, 8083, 8101, 8783, 8793, 8834, 9004, 9524, 9878, 10226, 10360, 10423, 11254, 11362, 11555, 11808, 11856, 12089, 12100, 12927, 12974, 12980, 13365, 14211, 14999, 15505, 16237, 16541, 16688, 16749, 16960, 17133, 18141, 18718, 18899, 19611, 19728, 20014, 20016, 20018, 20139, 20320, 21022, 21086, 21117, 21349, 21602, 21850, 23643, 23647, 24224, 24425, 24489, 24614, 25075, 25181, 25501, 25506, 26529, 26535, 28247, 29508, 29542, 29809, 29810, 29811, 29813, 29815, 30280, 30293, 30296, 30297, 30298, 30299, 30301, 30302, 30303, 30304, 30305, 30306, 30307, 30308, 30309, 30310, 30311, 30315, 30322, 30354, 30355

Sites

As highlighted above, 8 sites and were put forward in the Preferred Options document to meet the proposed development requirements for Addingham (all for residential). Under Q117 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **1160** representations were received in relation to the Addingham site allocations from **993** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents, landowners, organisations and Parish/Town Council. Table **84.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in Table **84.4**.

Table 84.3: Overview of Representations Received - Addingham Proposed Sites (AD1/H to AD8/H)

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
AD1/H - Turner Lane	177	157	158	14	5
AD2/H - Parsons Lane	156	134	134	16	6
AD3/H - Main Street / Addingham Bypass (East)	141	125	126	11	4
AD4/H - Main Street / Addingham Bypass (West)	112	94	96	11	5
AD5/H - Chapel Street	154	139	142	9	3
AD6/H - Moor Lane	186	167	169	12	5
AD7/H - Turner Lane/Silsden Road	169	159	160	4	5
AD8/H - Church Street/Main Street	65	18	21	38	6
Totals	**1160**	**993**	**1006**	**115**	**49**

Table 84.3 Addingham (AD1/H to AD8/H) - Summary of Representations Received

AD1/H: Turner Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
AD1/H - Turner Lane	177	157	158	14	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Environmental issues and wildlife impact • Loss of Green Belt land • Site availability • Impact on local infrastructure and services • Impact on local character • Site access • Impact on health • Proposed site density • Flood risk and drainage • Highways • Transport • General objections • General support • Support for transport, environment and general support • Comments on environment and housing	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H20 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Wildlife Corridor & Trees • Site is a valued wildlife corridor which links to Marchup Beck • Loss of trees • The site includes part of an avenue of mature trees that are used by bats on a regular basis. • Destruction of local wildlife and the refuge provided by the hedges from the road. • Impact on fauna and wildlife, deers, birds such as owls, curlews, otters, loss of greenfields.
2. Green Belt • Unnecessary loss of Green Belt land should not be developed until non-protected sites have been utilised first • There are many brown field sites in other areas more suitable • Building on Greenbelt should not be allowed destroying views and the openness of the village. • AD1/H is designated green belt and should not be considered as development site.
3. Site availability • Owner has indicated they do not wish to sell/develop the site
4. Impact on local infrastructure/services: • Education capacity • Drainage will be unable to cope • Distance from amenities in the village and lack of employment opportunities • Lack of public transport options will result in increase in car journeys • Insufficient infrastructure and roads will not be able to cope • Parking is a problem • Too much traffic • Addingham does not have the infrastructure to support all the proposed housing. • Limited employment opportunities • Limited bus services

Summary of Representations
• Medical centre is over -subscribed • There is no train station in Addingham
5. Proposed site access point: • Poor constrained access. The junction with Moor Park Road is very narrow • Access to AD1/H from Silsden Road would require modifying the A65 roundabout or cutting through the Recreation Ground. • Site access is inadequate
6. Impact on Local Character • Turner Lane is part of the Dalesway Highway and should be kept rural • The site represents the over development to the west of the village • Loss of greenspace integral to the character of the village • Loss of views • The development would be clearly visible from the main A65 road so would diminish the rural village character and appearance of the western end of Addingham. • Loss of traditional stone walls
7. Impact on health • Loss of greenspace will increase noise from A65 • Increase in pollution • Noise pollution • Potential for over100 extra cars will make the road unsafe particularly for the children who live and play on it. • The site is next to the very busy A65 and is at odds with the Council's wellness policy.
8. Proposed Housing Density: • Site yield is too high given access constraints. • Far too many houses. If it were 10 that would be more acceptable in order to reduce traffic flow and pollution.
9. Flooding/Drainage • Problems to drainage systems • Add to flooding lower in the village

Summary of Representations
• Site development will result in an increase in run off water • Concerns over drainage and fear of flooding. Flooding has become a problem.
10. Highways • Narrow roads • site is far from the village centre so people will be driving into the village, meaning more cars on Moor Lane which already has a 20mph limit that's often disregarded. • The density of housing proposed for this site is disproportionate to the road access. • Use of this site would significantly increase traffic along Moor lane and Moor Park drive.
• **Environment** • part of a green gateway to the village from the bypass, and provides a much needed rural buffer between the bypass and the housing developments on Turner Lane and the top of Moor Lane. • good wildlife area which would be lost if developed. • Mature trees and traditional walling on this green belt site maintain the traditional feel to the village, • the designated land on the western side of the village is Green Belt and is covered by a protection zone. • removing the trees to widen access will result in loss of habitat for birds • This site had a negative impact on the shape of the village and wildlife corridors. • loss of green space with this proposed development • Need to reduce carbon footprint. • The site falls within the overlapping zones of 2 SPAS / SAC's • Proposed area is a gateway for walkers. It forms part of the Dales High Way and will completely transform the western side of the village.
11. General • Not affordable housing • Neighbourhood Plan disregarded. • the owner does not wish to sell to developers/ The owner of this site will not release it for building purposes. • I understand that the owners of the other sites mentioned do not wish to sell their land and this should be respected. • Distance of site to local amenities • Levels of building disproportionate to size of village

Summary of Representations
Support:
1. Environment • Acceptable subject to ecology survey
2. Transport • Highways access to A65 instead of Main Street would be supported
3. General • Out of way site that offers no utility to village as a whole • appreciate that there is a need to build more homes and this seems a suitable location • Developing this land would hopefully keep traffic out of Addingham Village. It would require road access onto the A65. • Generally support this proposal provided mature trees and drystone walls are retained • Some additional housing in the village is certainly required. The smaller sites within the plan are perfectly reasonable providing the necessary additional investment in infrastructure and education is made. • Disagree with the overall conclusion of this site in the Green Belt Assessment, which needs re-evaluating, particularly given that the adjoining parcel AD/020 (Preferred Housing Site AD7/H) is scored differently.
Comments:
1. Environment • Dry stone walls and trees should be retained • Use SUDS
2. Housing • Development should include affordable homes

Representation IDs: 117, 378, 617, 705, 894, 1248, 1269, 1395, 1604, 1612, 1620, 1700, 1711, 1762, 1774, 1783, 1932, 2021, 2044, 2182, 2185, 2230, 2259, 2314, 2341, 2464, 2607, 2611, 2626, 2639, 2674, 2716, 2722, 2740, 2745, 2769, 2808, 2832, 2924, 2943, 3116, 3228, 3242, 3262, 3320, 3439, 3485, 3556, 3567, 3597, 3610, 3801, 3853, 3861, 3950, 3985, 4013, 4041, 4085, 4108, 4122, 4129, 4192, 4235, 4253, 4301, 4324, 4329, 4334, 4350, 4361, 4437, 4459, 4559, 4594, 4598, 4671, 4844, 4859, 4946, 5003, 5017, 5061, 5269, 5385, 5451, 5469, 6035, 7822, 8005, 8819, 9864, 9879, 9888, 10033, 10077, 10155, 10191, 10424, 10760, 11255, 11418, 11549, 11748, 11794, 11983, 12003, 12112, 12210, 12233, 12291, 12791, 12795, 12929, 12975, 12981, 13204, 13464, 14005, 14205, 14239, 14299, 14579, 15670, 15758, 16130, 16239, 16621, 16689, 16750, 16866, 18066, 18146, 18404, 18719, 19612, 19629, 19821, 19841, 20045, 20049, 20065, 20079, 20095,

20128, 20321, 20374, 20435, 20443, 20746, 20760, 21016, 21042, 21157, 21174, 21373, 21389, 21664, 21866, 23763, 24227, 24609, 24910, 25042, 25180, 25241, 28248, 28488, 29504, 29526, 30028, 30281, 30318, 30329, 30336, 30341, 30344

AD2/H: Parsons Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
AD2/H - Parsons Lane	156	134	134	16	6

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Environmental issues and wildlife impact • Loss of Green Belt land • Site availability • Impact on local infrastructure and services • Impact on landscape and local character • Site access • Impact on health • Proposed site density • Flood risk and drainage • General and environment comments • General and environment support	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H21 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Impact on local infrastructure/services: • Education capacity- no secondary school • Drainage will be unable to cope

- Distance from amenities in the village and lack of employment opportunities
- Lack of public transport options will result in increase in car journeys
- Lack of employment opportunities
- Addingham sewage system runs into Ilkley sewage system which is overwhelmed
- Roads, pavements and drainage are all in a poor state of repair and these will suffer again.
- No train station

2. Site availability

- Site is owned by the Parish council and protected for allotments
- The delivery of the site is in considerable doubt been available for 12 years and not been brought forward
- Site was bequeathed as an amenity to village provding allotments - they have never been offered. Field should be retained for the village

3. Site access

- Poor access- junction with Moor Park Drive is very narrow

4. Flood Risk

- Flood risk due to house building and ground springs

5. Impact on the local highway network:

- Impact from additional cars on Moor Lane/Moor Park Drive
- Poor transport links for commuters
- Impact on flow through the village on Main Street and Bolton Road
- Parking is a nightmare

5. Environment

- Site is a valued wildlife corridor
- Loss of mature trees
- Increase in pollution
- Increase in noise
- There are birds nesting in the trees here - notably bats which are a protected species as well as owls
- Can still hear Curlew in the local area. This habitat will be threatened by construction/house building.
- In area of overlapping North & South Pennine Moors SPA/SAC
- tree lined nature attracts hedgehogs

- Proposed area is a gateway for walkers. It forms part of the Dales High Way and will completely transform the western side of the village.
- Close to a nature reserve
- There are already concerns of flooding in the village and these can only be worsened by the replacement of soakaway fields at the top of the village with urbanisation and it's resultant increased run-off.

6. Impact on health

- Loss of greenspace will increase noise from A65
- Dangerous site due to proximity to children's play area

7. Proposed density/level of development:

- Site yield is too high given access constraint
- Addingham given a 10% increase of housing over other areas

8. Development of greenfield/Green Belt land:

- Alternative sites are available
- The loss of these Green Belt sites, will result in encroachment of development into the countryside, adversely affecting the view, environment and character of the village, which does not accord with Policy SP4:

9. Landscape

- Diminish rural character of village
- Impact on character and openness of Addingham
- The opportunity for sprawl, will be uncontrollable and the outstanding views over the open fields towards Beamsley will be lost forever.

10. General

- Development is non compliant with a Bradford Council Policy net zero carbon future
- Can the number of houses to be built be reduced. Can the expansion of the village be delayed to take into consideration
- Site was bequeathed as an amenity to village providing allotments - they have never been offered. Field should be retained for the village
- Parish Council stated this site is not available
- Conflict with NDP
- Levels of building in Addingham disproportionate to size of village
- Won't be affordable homes

- Due Process: consultation time is short. Residents not aware of plans.
- Proposed area is a gateway for walkers. It forms part of the Dales High Way and will completely transform the western side of the village.

Support

1. Environment

- Acceptable subject to ecology survey
- Mature trees and boundary walls should be retained
- support relatively low biodiversity value

2. General

- Support as recognise more homes need to be built
- Owned by Parish Council would provide affordable homes
- A good site for housing adjacent to existing housing
- Preferable to develop this site than others which are Green Belt

Comments:

1. **Environment**

- Dry stone walls and trees should be retained Impact on landscape character

2. **General**

- Site acceptable if affordable homes, use SuDS, retain trees and dry stone walls, allow for protected riparian zones
- Drivers do not comply with speed limits, concerns over levels of traffic
- Site in Flood Zone 1 ONLY It is possible the sites within close proximity to Flood Zones 3b, 3 and 2 may be subject to future risk identified within the
  SFRA (to follow) which may affect its allocation or how development should be sequentially laid out on the site.
- accept that the development of any one of these sites is acceptable, we would question the development of all of them as the cumulative impact would, we feel, be too great.
- Sites 1, 2 , 6, & 7 represent an infill of 81 houses and are too densely clustered in a small area at the western edge of Addingham. Infrastructure problems will be caused by excess traffic, limited and difficult access, drainage, flood risk etc.

Representation IDs: 616, 706, 895, 1396, 1579, 1605, 1613, 1621, 1703, 1710, 1763, 1776, 1787, 1933, 2022, 2231, 2316, 2342, 2613, 2627, 2640, 2688, 2718, 2723, 2752, 2770, 2806, 2838, 2925, 2952, 3118, 3226, 3268, 3321, 3440, 3448, 3487, 3540, 3569, 3598, 3611, 3809, 3855, 3866, 3952, 3988, 4014, 4042, 4069, 4115, 4140, 4231, 4241, 4251, 4311, 4326, 4335, 4351, 4365, 4440, 4560, 4600, 4616, 4670,

4869, 5010, 5015, 5018, 5072, 5117, 5384, 5431, 7823, 7890, 8576, 8820, 9865, 9880, 10034, 10078, 10192, 10425, 10763, 10766, 11256, 11419, 11550, 11795, 11984, 12004, 12113, 12212, 12234, 12292, 12792, 12796, 12930, 12976, 12982, 13205, 14010, 14206, 14240, 14300, 14581, 15671, 16131, 16240, 16622, 16690, 16751, 16867, 18064, 18147, 18720, 19613, 19630, 19822, 19842, 20013, 20046, 20050, 20066, 20078, 20096, 20129, 20322, 20375, 20436, 20444, 20747, 20761, 21017, 21043, 21158, 21175, 21374, 21390, 21665, 21867, 23865, 24228, 24610, 24911, 25072, 25242, 26531, 28605, 29505, 30029, 30271, 30274, 30282, 30319, 30337, 30345

AD3/H - Main Street / Addingham Bypass (East)

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
AD3/H - Main Street / Addingham Bypass (East)	141	125	126	11	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Environmental issues and wildlife impact • Ecology and trees • Loss of Green Belt land • Impact on heritage and conservation area • Impact on local infrastructure and services • Impact on highways network • Impact on local character • Site access • Impact on health • Proposed site density • Flood risk and drainage • Loss of open space • Conflicts with Neighbourhood Development Plan • Impact on recreation • Support on housing and heritage • Comments on heritage, environment and landscape	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H22 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations:

Objections

1. Impact on local infrastructure/services:

- Primary and secondary school capacity, drainage and highways at capacity
- Distance lies some distance from the amenities in the village and is not accessible to public transport
- No train station
- numerous issues with drainage, water supply and sewage
- the Addingham sewage system runs into the Ilkley sewage system (which is already overwhelmed)
- limited employment within village
- extra healthcare facilities would be required
- inadequate proposals have been presented with regards to upgrading local infrastructure to cope with proposed extra housing. and extra pressures on local services.

2. Site access

- Inappropriate access via narrow roads
- Impact on pedestrian safety
- Southfield lane which would be the access road is a narrow road on a corner with poor visibility and lots of cars parked.

3. Impact on the local highway network:

- Impact on local road network/highway safety from junction of Southfield Lane/St Pauls Rise and junction with Main Street/Old Station Way which is already congested
- Both access points for this development are reached via Old Station Way which bears the weight of street parking as an overflow from Main Street and the adjacent terraced rows. This makes visibility and access difficult at the junction and within the first 50 metres.
- Site AD3/H does not meet the minimum accessibility standards for public transport set out In Appendix 6.
- As both St Pauls Rise and Southfield Lane are both accessed from Old Station Way the amount of traffic on already a heavily parked road will increase some 50% or even more. This leading on to an already busy and congested main road

out of the village which either way you go east or west.

- There will be an increase in traffic which result in unacceptable and potentially dangerous levels
- The angular sharp turn at the bottom before it joins St Paul's Rise can not sustain the extra traffic.

4. Impact on heritage and conservation area

- Ancient field patterns and the setting of the village will be impacted. Need to protect medieval Hollow Lane
- The proposal fails to recognise and acknowledge the historical artefacts to the northern end of the site. The proposal should be downsized and the site reduced accordingly
- This proposed increase will result in the partial development of the "Sailor Fields" between the village and the A65 bypass.
- It will destroy the linear nature of the village and the setting of its 129 listed buildings and monuments.
- It will also negatively impact the distinctive Dales landscape and bring new development into the South Pennine SAC/SPA Protection Zone.
- intrinsic heritage, archaeological and ecological importance especially to its medieval history.

5. Loss of open space

- Site forms part of valuable recreation space, important to the setting of the village
- Impact on Landscape and Landscape Setting of the Village – the villages landscape accord closely with that of the adjoining Yorkshire Dales.

6. Ecology, Habitat & Trees

- Loss of mature trees/hedgerows and agricultural land
- Impact of development on biodiversity/ecology. The area is a wildlife corridor and important habitat for barn owls and other species
- South Pennine Moors SPA- site has the potential to lead to the loss of valuable habitat for birds
- The need to protect the medieval hollow lane and hedgerow also the small beck. An ecological survey would need to be done to protect birds from the moor .
- In summer the field becomes a wild flower meadow supporting butterfly's and bees.
- This site is adjacent to a conservation area which without doubt will be adversely affected by such a large scale development.
- High value site for wildlife
- Protect the integrity of the medieval hollow lane and hedgerow along the northern boundary by blocking vehicular

access from Southfield Lane and leaving a wide wildlife buffer strip along the southern boundary line;

- AD3/H is bordered by an ancient hollow lane and hedgerow providing valuable habitat for birds.

7. Neighbourhood Plan

- Conflict with adopted Addingham neighbourhood plan

8. Flood risk/water quality

- Impact from development on springs, leading to increased surface water run off and impact on local water courses.
- Flooding within the village/Town Beck
- drainage systems cannot cope
- Protect the small beck running down the eastern edge of the site by creating a riparian buffer zone along the entire length of the boundary
- Ensure that surface water from this site especially is managed using SuDS and not allowed to enter drains that ultimately join Town Beck on Main St.

9. Impact on Recreation

- Development will impact public footpaths out of the village

10. Proposed density/level of development:

- Site yield is too low- this is an ineffective use of land
- Serious risk of unsustainable sprawl to West
- It can easily be seen from the map that if this site and/or site AD4/H are developed, there will inevitably be future proposals and pressure for the development of the four fields in between them and also the five fields lying to the north. It would transform the area from a rural village into a big suburban housing estate.

11. Development of greenfield/Green Belt land:

- Countryside encroachment, impact on openness and urban sprawl
- No exceptional circumstances have been demonstrated
- Development will lead to further infilling between village and bypass
- Alternative PDL sites available elsewhere in the District
- Green Belt should not be considered for development

12. Health

- The large volume of additional traffic will impact on air quality and health.
- Road safety
- Benefits of the land and PROWs to people's physical and mental health.

13. General

- Non compliance with Bradford Council policy on zero carbon future.
- The character of the village will be forever lost. Addingham is surrounded by green fields and has a definite country feel.
- Bisected by two PROWs. These are the main walking routes of the village, along with allowing residents to access the Millennium Way, Addingham Moorside and Addingham High Moor/Rombalds and Ilkley Moor.
  Number of houses proposed disproportionate to size of village
- No justification for the proposed housing numbers identified to warrant removal of areas of Green Belt.
- Concern over sites AD3/H, AD4/H, IL1/H, IL3/H & BU1/H resulting in virtual ribbon development between Guiseley and Addingham. Creeping urbanisation is a major threat to the environment and damage those qualities that attract visitors and prosperity.
- sites AD3/H and AD4/H are situated within 2.5km of the Habitat Protection Zone for the South Pennine Moors SPA/SCA on the Wharfe Valley bird flyway.
- Eastern approach to Ilkley will be ruined by development of IL3/H. There are no exceptional circumstances for Green Belt boundary changes. Traffic pressure is a major issue – 300 homes will make it worse.

Support:

1. Housing

- Site located close to village centre
- Site contains some PDL
- The need for more homes especially affordable homes is recognised
- Infill development up to the bypass is a logical location as access is already available. Ensure footpaths remain in place.
- This site is fairly near the village centre making it possible to walk to use village amenities. A car would not be essential to access Main Street.

- A masterplan which covers all the land including that between AD3/H and AD4/H incorporating quality of environment, place and design can be achieved
  Site is being promoted
- Conduct a detailed ecological survey to identify the impact of house building on the foraging opportunities for the wader populations associated with the S. Pennine Moor SPA to the south and the hunting range of the local barn owl population in the field to the north.
- Support this only because we have to have some houses somewhere. Since this field already has buildings on it, it's the least worst option.
- A unifying master plan approach proposed for totality of the landholding (inc. remainder of land between sites) and the enhanced quality of the environment, place and design which can be achieved via the proposals including:
- Provision of on site habitat improvements, particularly in 4 southern fields, Other habitat/biodiversity enhancements will be included subject to consultation with local groups, who hold valuable expertise and survey information having closely monitored species within the village locality. Natural England and the Yorkshire Wildlife Trust will be consulted. Approach is to form a mosaic of habitats with appropriate after management plans.
  • A network of tree and hedge planting improvements along existing and new lines are proposed with appropriate after management.
  • The northern three fields which make up the designated Village Greenspace area will primarily be improved as a parkland area to provide certain on-site recreation facilities.

2. Heritage

- The Heritage Impact Assessment for this site considers that if the field-edge planting was maintained and reinforced as part of any development proposal, development would not be visible from within the Conservation Area. The HIA concludes that development of the proposed site would have a Negligible impact on the significance of the Conservation Area.

Comments:

- **Heritage**
  Historic England- The site is adjacent to Addingham Conservation Area and close to several Grade II listed buildings, including Burnside Mill House. The HIA concludes the site is potentially acceptable with mitigation- further detail required to mitigate impact on Conservation Area, particularly in relation to the height of buildings, roof scape design and building material; in allocating this site the Council must be satisfied that the fields within the Conservation Area to the north of the site remain viable farm land, will not

otherwise risk degeneration if they become disused, or face increasing pressure for development. The same applies to the fields between sites AD3/H and AD4/H • Natural England: Where loss of functionally linked land for SPA birds cannot be ruled out at this stage recommend that allocation requirement text in the plan sets out survey and mitigation requirements clearly.
2. Environment • The site provides an opportunity to enhance biodiversity/ecology/access/recreation on surrounding land • Need to ensure that all the footpaths remain in place as this is a primary route of access to the land south of the bypass for walkers • If development is granted considerations should be put in place to reduce the car along St Paul's Rise (speed humps preferable). Protect the integrity of the medieval hollow lane and hedgerow along the northern boundary by blocking vehicular access from Southfield Lane and leaving a wide wildlife buffer strip along the southern boundary line; Protect the small beck running down the eastern edge of the site by creating a riparian buffer zone along the entire length of the boundary; detailed ecological survey to identify the impact of house building on the wader populations associated with the S. Pennine Moor SPA; surface water from this site especially is managed using SuDS and not allowed to enter drains that ultimately join Town Beck on Main St
• Environment Agency- site is within flood zone 1. water discharge rates post development should be restricted to the pre development discharge rate. For developments near ordinary watercourses recommend an 8 metre easement strip along the length of the riverbank
3.Landscape • Natural England- The site lies in proximity to the South Pennine Moors (Phase 2) SPA and has potential to lead to the loss of functionally linked Tland for SPA. Where loss of functionally linked land cannot be ruled out at this stage we recommend that allocation requirement text in the plan sets out survey and mitigation requirements clearly

Representation IDs: 379, 403, 559, 562, 585, 650, 655, 707, 813, 828, 850, 864, 905, 960, 1189, 1427, 1580, 1622, 1639, 1650, 1770, 1777, 1814, 1854, 1935, 1949, 2025, 2234, 2617, 2690, 2743, 2761, 2772, 2834, 2857, 2927, 2991, 3123, 3147, 3162, 3209, 3263, 3269, 3449, 3479, 3488, 3494, 3503, 3509, 3562, 3568, 3571, 3574, 3587, 3603, 3826, 3868, 3937, 3956, 3994, 3996, 4015, 4054, 4075, 4120, 4248, 4256, 4265, 4320, 4321, 4327, 4336, 4343, 4353, 4367, 4444, 4522, 4563, 4602, 4635, 4661, 4669, 4684, 4700, 4816, 4867, 4897, 4909, 4913, 4977, 5083, 5108, 5138, 5272, 5434, 6036, 6151, 7818, 8142, 8577, 9881, 11261, 12005, 12933, 12983, 13465, 14207, 16241, 16754, 17134, 17528, 18143, 19729, 19876, 20051, 20067, 20130, 20323, 20441, 20445, 20762, 21256, 24229, 24490, 24611, 26487, 26532, 26536, 28175, 28249, 28606, 29416, 29528, 30032, 30063, 30073, 30275, 30313, 30326, 30330, 30335

AD4/H: Main Street/ Addingham Bypass (West)

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
AD4/H - Main Street / Addingham Bypass (West)	112	94	96	11	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Environmental issues and wildlife impact • Ecology and trees • Loss of Green Belt land • Impact on heritage and conservation area • Impact on local infrastructure and services • Impact on highways network • Impact on local character and landscape • Size of site • Site access • Impact on health • Proposed site density • Flood risk and drainage • Loss of open space • Conflicts with Neighbourhood Development Plan • Impact on recreation • Support on housing • Comments on environment, heritage and general	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H23 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

AD4/H: Main Street/ Addingham Bypass (West)
Summary of Representations
Objections:
1. Impact on local infrastructure: • Impact of development on local infrastructure including primary/secondary school capacity, drainage, highway network • Site lies away from local services and is not accessible to public transport. Poor access for cycle accessibility • Sewage and drainage systems already overwhelmed. • Limited employment opportunities in the village. • Lack of Infrastructure particularly in relation to drainage, sanitation • energy supply; old and inadequate cabling, numerous issues with drainage, water supply and sewage • no train line • impact on internet as more people working from home
2. Size of site • The site is too large and is out of proportion • Large buffer zone of trees/hedging needed to protect residents from noise and pollution from the bypass. • Development on this site is promoted at an inefficient 24 dwellings per hectare. This will not provide sustainable use of Land Highlights the Council must identify a housing need requirement for a particular settlement, so that housing growth numbers can be justified.
3. Impact on setting/loss of open space • Loss of open area of value to setting of the village and recreation • Loss of trees/hedgerows • Impact on landscape character as viewed from Yorkshire Dales National Park and Beamsley Beacon to the north and west • The “green wedge” between the St Paul's Rise area and the Big Meadow Drive area is a popular recreational area • Impact on Public Rights of Way- main walking routes out of the village

- If available, land should be used for sport and recreation particularly those at the west end of the village where such facilities are very limited or community orchards/ tree planting to be part of the Northern Forest/additional allotments.

4. Flood risk/water quality

- Loss of green fields for water storage and potential impact on river quality from run off
- Extra housing cause increase in flooding
- Manage surface water flooding using SuDS
- Water Runoff and Sewage Volumes: Addingham's facilities are already overwhelmed during heavy rainfall.
- flooding within the village centre / Town Beck
- increase in water pollution to the beck running in to River Wharfe

5. Impact on the local highway network:

- Highway and pedestrian safety. Increased congestion in the village
- Do not want more traffic on the roads a long way from facilities increasing noise and pollution.
- There is already a large development at Street Lane with existing problems of one entrance from and exit onto Silsden Road.
- Road safety, especially around the junction with Bolton Road in close proximity to the proposed access for site AD3/H via Old Station Way and St Paul's Rise.

6. Impact on heritage and conservation area

- Impact on character of the conservation area and ancient field patterns
- This would set a worrying precedent and impact views/village character from particularly the Yorkshire Dales National Park at Beamsley Beacon to the north and the moors west. This ancient pasture land, is bisected by two main walking routes out of the village
- The "Sailor Fields" area (including AD3/H andAD4/H)
- has heritage, archaeological and ecological importance with respect especially to its medieval history.
- It has intrinsic heritage, archaeological and ecological importance with respect especially to its medieval history.

7. Location of the proposed site access:

- Only access is from a residential road which will add significant volume to the junction with Silsden Road.
- Access is too narrow

8. Ecology/Wildlife

- Area is a significant wildlife corridor and also important habitat for barn owls
- It is used as foraging ground for IUCN Red List threatened species – lapwing together with 33 other bird species.
- Site lies in close proximity to South Pennines SPA- its development has potential to lead to loss of functionality
- Need to conduct a detailed ecological survey
- It is the most important wild bird site in Addingham. These form a wildlife corridor linking Town Beck to the woods adjacent to the A65, used by many small birds for nesting and feeding including Red Listed Tree Sparrows, Song Thrush, Mistle Thrush and Spotted Flycatcher. Bats and raptors like Barn Owl and Sparrow Hawk patrol daily.
- Loss of trees that need protection ancient hedgerows

9. Impact on health

- Loss of greenspace will increase noise from A65

10. Neighbourhood Plan

- Site allocation conflicts with the adopted Neighbourhood Plan

11. Proposed density/level of development:

- Yield is too high given access constraints.
- No further development to the east of this field should be allowed to maintain the broad green connection between the village and the Moorside

  The housing allocation has been increased from 75 (Partial Review of the Core Strategy 2019) to 175 in the latest Preferred Options proposal, representing an increase of 133%. There is no specific evidence offered for this increase,

12. Development of greenfield/Green Belt land:

- Development will lead to further infilling of land between village and bypass
- Countryside encroachment, impact on openness, ribbon development

and urban sprawl

- No exceptional circumstances have been demonstrated
- Other PDL sites available in other parts of the District

13. Landscape

- AD4/H is situated within 2.5km of the Habitat Protection Zone for the South Pennine Moors SPA/SCA on the Wharfe Valley bird flyway.
- The rural aspect of the southern side of the village would be lost.
- The South Fields are a crucially important green space between the village and the bypass and enhance the rural nature of the village.
- Impact on character of village
- The developments would be detrimental to the natural views of hills and moorland that existing residents enjoy and would change the rural and natural setting of local paths and walking routes.

14. General

- There are many viable brown field alternatives, e.g. in Shipley and Bradford.
- The development is non-compliant with the Addingham village plan and the Bradford council's own policy of a zero carbon future.
- Site does not comply with Strategic Polices SP4 /SP& and TR3 transport policy and does not meet accessibility standards.
- Housing on this site is unnecessary for Addingham. The Neighbourhood Plan is explicit in recommending small infill developments, maintaining the character of the village and its green spaces. Utilising the infill sites would provide sufficient new housing stock.
- AD3/H & AD4/H do not represent the wishes of Addingham Residents as clearly shown in the Approved Neighbourhood Plan.
- too expensive for affordable housing, our own kids have to move out of the village to buy homes.
- Highlights the Council must identify a housing need requirement for a particular settlement, so that housing growth numbers can be justified.
- Bisected by two PROWs. These are the main walking routes of the village, along with allowing residents to access the Millennium Way, Addingham Moorside and Addingham High Moor/Rombalds and Ilkley Moor.
- two proposed developments designated
  AD3/H and AD4/H are of particular concern as they would begin the process of “in-filling” the designated land between Addingham village Main Street and Addingham bypass.

- Non compliance with Bradford Council policy on zero carbon future.
- Concern over sites AD3/H, AD4/H, IL1/H, IL3/H & BU1/H resulting in virtual ribbon development between Guiseley and Addingham. Creeping urbanisation is a major threat to the environment and damage those qualities that attract visitors and prosperity.
- Impact of views from the The Dales Way footpath
- There is no clear vision to increase passenger capacity on local public transport. This is in contravention to the Governments Decarbonising Transport strategic priority.

Support:

1. **Housing**

- Infill up to the bypass is the logical location for homes in the village as access is already available
- support this proposed development that has good vehicular access.
- The need for new homes especially affordable homes is recognised
- Support for additional development where it enhances the village
- A masterplan approach which connects both sites with the land between will ensure the quality of the environment, design and place- (additional site promoted)
- Wide marginal buffer strips should be created along the hedge bottoms to improve wildlife habitat and movement.
- Conduct an ecological survey
- Enhance field boundaries by filling in gaps in the hedges and creating wide marginal buffer strips along hedge bottoms to improve wildlife habitat and wildlife movement along the hedgerows;
- The northern three fields which make up the designated Village Greenspace area will primarily be improved as a parkland area to provide certain on-site recreation facilities.
- Protect Coppy beck by creating a wide riparian buffer strip along the entire length of the western boundary
- This appears more reasonable site and nearer to the village centre and without a hill.
- Support additional housing in Addingham where it enhances the village.
- The site is partially within the Addingham Conservation Area and close to several Grade II listed buildings, including Ivy House. The development of this area could harm elements which contribute to the significance of these designated heritage assets. As highlighted by the HIA, in allocating this site the Council must be satisfied that the fields within the Conservation Area
to the north remain viable farm land, will not otherwise risk degeneration to scrub if they become disused, or face

increasing pressure for
development. The same applies to the fields between sites AD3/H and AD4/H.

Comments:

1. **Heritage**

- Heritage England- The site is adjacent to Addingham Conservation Area and close to several Grade II listed buildings, including Ivy House. The HIA concludes the site is potentially acceptable with mitigation- further detail required to mitigate impact on Conservation Area, particularly in relation to the height of buildings, roofscape design and building material; in allocating this site the Council must be satisfied that the fields within the Conservation Area to the north of the site remain viable farm land, will not otherwise risk degeneration if they become disused, or face increasing pressure for development. The same applies to the fields between sites AD3/H and AD4/H.

2. **Environment**

- Environment Agency- site is within flood zone 1. water discharge rates post development should be restricted to the predevelopment discharge rate. For developments near ordinary watercourses recommend an 8 metre easement strip along the length of the riverbank
  footpath bordering the site should be retained-
- A detailed ecological to identify the impact of house building associated with the S. Pennine Moor SPA to the south and local barn owl population in the field to the ; Protect Coppy beck by creating a wide riparian buffer strip along the entire length of the western boundary; Enhance field boundaries by filling in gaps in the hedges and creating wide marginal buffer strips along hedge bottoms to improve wildlife habitat and connectivity; Ensure that surface water from this site is managed using SuDs to protect Coppy Beck to the west and Town Beck to the north.
- No further development to the east of this field should be allowed to maintain the broad green connection
- Bypass is raised 10 metres approx above the proposed AD4/H development no adequate barriers are on the road side.
- Increase in pollution
- Maximum speed is permitted and no adequate barriers on roadside to bypass.
- AD4/H/Main Street/Addingham By-pass West Access by road to and from this site is less problematic than for AD3**.**
- Any new development should respect the concerns expressed by the Addingham Environment Group, which would require the preservation of boundary hedges and trees and the creation of a riparian buffer strip.
- There is a danger that this very suburban state will become disproportionately large

• The site lies in proximity to the South Pennine Moors (Phase 2) SPA and has potential to lead to the loss of functionally linked land for SPA birds. Where loss of functionally linked land cannot be ruled out at this stage we recommend that allocation requirement text in the plan sets out survey and mitigation requirements clearly. • Consideration must be made to making space for water and providing betterment in terms of flood risk management where ever possible.
3. General • Again, subject to suitable mitigation we can see the logic of these two developments. However, concerned regarding the impact of residents generally on the remaining pasture fields (barn owls etc.), even if not developed. Also we have a suspicion of "mission creep" for further development of the fields between the two sites.

Representation IDs: 615, 708, 1428, 1581, 1624, 1662, 1778, 1815, 1936, 2027, 2078, 2236, 2267, 2619, 2691, 2749, 2768, 2781, 2835, 2870, 2930, 3124, 3155, 3163, 3255, 3491, 3577, 3608, 3628, 3911, 3940, 3957, 3997, 4016, 4061, 4123, 4247, 4264, 4319, 4322, 4337, 4354, 4368, 4445, 4530, 4570, 4577, 4603, 4659, 4672, 4701, 4818, 4850, 4904, 4911, 4915, 4990, 5084, 5140, 5274, 5437, 5731, 5800, 6037, 6700, 7367, 7819, 8006, 8564, 8578, 9882, 10022, 10890, 10892, 11262, 12006, 12548, 12984, 13466, 14208, 16242, 16693, 16755, 17135, 18144, 19730, 19877, 20052, 20068, 20131, 20324, 20446, 20763, 21257, 21377, 24230, 24491, 24612, 26488, 26533, 28176, 28250, 28607, 29417, 29529, 30033, 30064, 30074, 30317, 30328, 30331

AD5/H: Chapel Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
AD5/H - Chapel Street	154	139	142	9	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Environmental issues and wildlife impact • Impact on heritage and conservation area • Impact on local infrastructure and services • Impact on highways network • Impact on local character and landscape • Site access • Impact on health • Proposed site density • Flood risk and drainage • Loss of open space • Impact on recreation • Support on highways and housing • General comments, environment and highways	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H9) is not carried forward as a preferred option and rejected. • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of Representations:
Objections:
1. Impact on local infrastructure: • Impact of development on local infrastructure including primary/secondary school capacity, doctors, drainage, highway network

- Limited employment opportunities in the village
- Lack of local amenities

2. Impact on the local highway network:

- Chapel Street and other connecting roads are well used by school children and has no pavements. Any additional traffic could impact on wider local road network.
- Back Beck Lane is a quiet, single track lane on which our children walk to school. There is no pavement and any increase in traffic along the lane and Chapel St would be dangerous & unacceptable.
- Problems with highway safety
- Problems with parking

3. Ecology/Wildlife

- Impact on the wildlife corridor along the Back Beck area. The site is rewilding and would be well used as a nature reserve. Although this is a brownfield site, it is a site of high biodiversity
- Impact on mature trees
- richest wildlife site in the village for butterflies, birds, bats and bees
- site has become a lovely area for observing nature and contains an ancient hedge and trees with preservation orders.
- Very high biodiversity value site

4. Location of the proposed site access:

- Access is unsuitable. Chapel street is too narrow. Any additional traffic on Back Beck Lane is too narrow for modern vehicles. Access from School Lane – single track lane for most of its route
- Traffic flow along Back Beck lane is currently one way along a very narrow lane.
- The junction of upper and lower School Lane with Green Lane and Burns Hill is a particular issure with no pavement and narrow blind bends.
- Should be a village nature reserve

5. Loss of recreation/open space

- This part of the village is an extremely attractive part, well used by residents of the village for recreational purposes. Impact on the Back Beck/Long Riddings green/blue infrastructure corridor. Site if a significant green space in the centre of the village
- Site adjoins well used attractive footpath

6. Impact on local character

- The Landscape Character Appraisal commissioned as part of Neighbourhood Plan supports the importance of this site as part of the Addingham Enclosed Pastures Landscape Character Area.
- Impact on village character.
- The site is close to and falls within the protection zone for the SPA/SAC.

7. Impact on Heritage

- The site is located adjacent to the Addingham Conservation Area and close to the Grade II listed George Oates Greenwood Mausoleum. The development of this area could harm elements which contribute to the significance of these designated heritage assets. HIA required to assess impacts
- Impact on Listed buildings

8. Flood risk/water quality

- Site is located in a flood risk area. Historic flooding from Back Beck. Impact of development on local surface water flood risk, loss of greenfield to store flood water. Impact on river quality including the Wharfe.
- The abutting beck regularly over tops into this site.

9. Proposed density/level of development:

- Too many houses allocated to Addingham as a village/Local Service Centre, with limited employment, infrastructure and no secondary school

10. General

- Should use alternative Brownfield sites instead
- Increase in light and noise pollution
- Site not appropriate for development for the reasons given and/or number of factors make it financially unviable for a developer.
- Houses will be totally unaffordable to most first time buyers and young local residents.
- We object strongly to AD1/H, AD2/H, AD3/H and AD4/H. AD5/H is a rich wildlife site which should be designated as such.
- Non compliance with Bradford Council policy on zero carbon future.

Support:

1. Highways

- This site is very near the primary school and centre of the village. A car would not be essential. This site would help to fulfil the requirements of new residents engaging with the village community and strengthening resilience to climate change.
- Whilst access is difficult improved access can be created from School Lane. Support for including AD/011B and the larger site would accommodate more dwellings in an accessible and sustainable location thus removing the need to build on more valuable green belt sites to the west of the village

2. **Housing**

- Additional housing is required in Addingham and will help to increase the opportunities for newly formed households
- The promotion of this Brownfield site is welcomed as is the recognition that 'the site is well located to provide residents with good access to services and amenities
- Development would improve derelict site in poor condition
- support the planned 5 houses on Ad5/H. It is currently a disgrace despite a few butterflies and birds.

Comments:

1. General comments

- The whole area could be designated as a Local Greenspace and managed as a village wildlife reserve.
- Should be stipulated that new builds must use Yorkshire stone and not the 'mock stone' that blights houses built nowadays
- There are concerns about any impact on the Conservation Area and also regarding drainage issues.

2.Environment

- Environment Agency- site is within flood zone 1. water discharge rates post development should be restricted to the pre development discharge rate. For developments near ordinary watercourses recommend an 8 metre easement strip along the length of the riverbank
- Site within Flood Zone 1 only - Consideration must be made to making space for water and providing betterment in terms of flood risk management where ever possible.

3. Highways

- 20mph speed bumps must go in on School Lane

Representation IDs: 383, 448, 614, 896, 992, 1197, 1271, 1426, 1625, 1642, 1654, 1764, 1779, 1852, 1871, 1937, 2028, 2102, 2133, 2239, 2245, 2326, 2486, 2620, 2633, 2641, 2675, 2694, 2702, 2771, 2776, 2782, 2815, 2933, 2989, 3122, 3128, 3267, 3293, 3340, 3416, 3452, 3486, 3492, 3508, 3580, 3593, 3613, 3615, 3785, 3814, 3872, 3914, 3943, 3959, 3998, 4005, 4018, 4025, 4056, 4077, 4094, 4107, 4125, 4131, 4246, 4260, 4268, 4328, 4338, 4355, 4381, 4412, 4446, 4569, 4660, 4826, 4871, 4917, 4918, 5143, 5279, 5342, 5401, 5440, 5744, 5815, 7820, 8565, 8587, 9671, 9883, 10023, 10156, 10344, 10891, 10893, 10935, 11553, 11753, 11767, 11919, 12007, 12090, 12115, 12901, 12928, 12932, 12985, 13055, 13366, 13469, 14580, 15828, 16243, 16373, 16379, 16543, 16610, 16694, 16832, 16961, 17875, 18142, 18239, 18717, 18760, 19070, 19820, 20015, 20053, 20069, 20132, 20141, 20325, 20378, 20447, 21014, 21156, 21378, 21495, 24231, 24497, 26537, 27551, 28318, 28608, 29418, 30034, 30276, 30278, 30332, 30343, 30357

AD6/H Moor Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
AD6/H - Moor Lane	186	167	169	12	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Environmental issues and wildlife impact • Ecology and trees • Loss of Green Belt land • Impact on heritage • Impact on local infrastructure and services • Impact on highways network • Impact on local character and landscape • Site access • Impact on health • Proposed site density • Flood risk and drainage • Loss of open space • Conflicts with Neighbourhood Development Plan • Impact on recreation • General support, environment and highways • General comments, housing and environment	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H24 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Impact on local infrastructure**:
   - primary/secondary school have no capacity,
   - Drainage on Moor Lane is poor - drainage with inadequate sewers
   - Lack of school places
   - Sewage system cannot cope
   - Site is a distance from local facilities and is unsustainable. 1.4km from village centre up hill.
   - The site not accessible to public transport
   - Infrastructure cannot support the development
   - Limited employment opportunities
   - Internet - higher demand due to people working from home
   - Lack of employment
   - Loss of agricultural land
   - Limited public transport and buses servicing the site
   - Utility supplies are not sufficient.
   - Problems with parking
   - As a small village with poor transport links i.e. no train station we appear to have been allocated a huge number of houses compared to surrounding towns/area with better transport links.

2. **Impact on the local highway network**:
   - Impact on local highway/pedestrian safety, in particular increase the traffic on Moor Lane Turner lane and Moor Park drive. Impact on congestion on the village. Impact on junction of Old Skipton Road and Silsden Road, which would need alterations
   - The development of land opposite has already had an impact on traffic on Moor Lane
   - Moor Lane is already extremely traffic heavy with cars travelling far above the speed limit, a speed traffic survey is certainly needed now

3. Location of the proposed site access:

- Unsuitable access along narrow congested road with on street parking (Moor Lane).
- has access for a public footpath so encroaches even further on greenbelt land.
- 1 mile away from local amenities
- Inadequate vehicle entry and exit.
- Density of housing disproportionate to road access

4. Impact on Heritage

- Site directly adjoins 2 listed buildings

5. Wildlife / ecology

- Impact of development on wildlife/ecology.
- Site is used by Curlews. The site is within 2.4 km from the nearest edge of the South Pennine Moors SPA/SAC (European Site) and is therefore subject to the 2.5 km zone of influence as highlighted in the Habitat Regulations Assessment. Potential to lead to the loss of functionally linked land for SPA birds
- Loss of hedgerows/trees along boundaries
- Close to a nature reserve
- Bats regularly fly over this area and nest on and close to the site. The site is a major source of insects which bats feed on.

6. Flood risk/water quality

- Water currently pools on site and ground springs. Stream runs down the side of the site. Impact of development on local surface water flood risk, additional problems with drainage and loss of greenfield to store flood water. Impact on river quality including the Wharfe.
- Significant increase of flood risk - houses towards top of Moor Lane already affected by flooding caused by both field run-off/water courses along North/South of site (local houses already get water inside).
- Building will increase flood water/run off to the field of Heathness Road and other western sections of village.
- The current drainage system in the village is not equipped to cope with the current number of houses in the area. New housing will exacerbate the problem and increase the risk of local flooding

7. Impact on local character

- Impact on local character loss of views on entering the village to Beamsley Beacon on the footpaths crossing the bypass, - loss of rural character- quiet semi rural roads with very little traffic greatly enjoyed for country walks, cycling and horse riding
- Key views to Beamsley Beacon from PROWs s part of the Millennium Way/Dales Highway. This rural car free lane is used daily by hikers, dog walkers, children, the elderly as a safe area to exercise/enjoy and should be preserved
- Loss of open agricultural land- important to the setting of the village
- The development will add to the urbanisation of the western end of the village. On its own this will result in a noticeable loss of the attractive rural character of this area.
- Green Belt site AD6/H will encroach into the countryside and impact the character and uniqueness of Addingham.
- Loss of mature trees

8. Proposed density/level of development:

- Density of housing proposed is disproportionate to the road access.
- Too many houses allocated to Addingham as a village/Local Service Centre, with limited employment, infrastructure and no secondary school
- AD6/H was refused planning a few of years ago and nothing has changed so the reasons put forward then are still valid
- Development here is promoted at an inefficient 25 dwellings per hectare.

9. Development of greenfield/Green Belt land:

- Impact on Green Belt-, countryside encroachment, urban sprawl and major impact on openness, potential for sprawl to the open boundary to the north. Exceptional circumstances not demonstrated as alternative brownfield sites available
- If this green belt land were developed what is there to stop continued development towards Skipton along similar grazing fields?

10. Impact on health

- impact on future amenity from traffic on the A65- noise/pollution from construction work
- increase in air pollution
- safety of children due to increase of cars
- impacts of noise
- Occupiers will not walk (or cycle) to and from village amenties due to this site being at the top of the hill.

- Green space is good for the environment and for mental health.

11. Landscape

- It is within the 2.5 km habitat protection zone for the South Pennine Moors SPA/SCA and within the 2.5 km zone of the North Pennine Moors SPA/SCA.
- Loss of rural character of the area
- Moor Lane constitutes part of the Millennium Way and development here will destroy part of the natural beauty of the area as views to Beamsley Beacon will be lost from the Millennium Way route.

12. General

- Conflicts with NDP
- Approach to consultation amounts to abuse of due process. Consultation time is short. Residents not aware of plans.
- There are many viable brown field alternatives, e.g. in Shipley and Bradford.
- The development is non-compliant with the Addingham village plan and the Bradford council's own policy of a zero carbon future.
- Loss of open/green space
- Impact on public footpath
- Development will not result in affordable housing
- lack of evidence of the need for a further large housing development in Addingham which would increase the strain on a village which already has limited employment, shopping and recreational facilities. Main Street congestion would worsen.
- AD6/H was refused planning a few of years ago and nothing has changed so the reasons put forward then are still valid.
- The total number of new dwellings proposed for Addingham is disproportionate to the size of the village.
- Roads, pavements and drainage are all in a poor state of repair and these will suffer again.
- The site is next to the A65 and so is at odds with the Council’s wellness policy.
- appears to be one of a number of similar developments in this area and together they will have a major negative impact on the local appearance and character.
- Development will have a negative impact on the environment
- Short consultation time
- objection to the proposed building plans in Ilkley (IL1/H, IL2/H, IL3/H and IL4/H),

Burley-in-Wharfedale (BU1/H and BU2/H), and Addingham (AD1/H, AD2/H, AD3/H, AD4/H, AD5/H, AD6/H, AD7/8 and AD8/H), particularly those that are proposed on current green belt sites. Proposals would significantly change the character of these towns and the surrounding areas

Support:

1. General Support

- Support the proposal, as there is a need for new houses
- If we have to have any new housing, this is a better place than AD3/4/5
- The site could meet a revised and reduced housing target of 75 units while minimising the release of green belt
- The site is bounded by existing development to the east and the A65 to the west. Recent development extends the physical extent of the village as far west as the A65. opportunity to 'round off' the settlement in a sustainable, consistent and sensitive manner. Proximity to the bypass would make it an acceptable development site.
- The site would provide a modest amount of growth of approximately 30 dwellings, commensurate with the 'smaller scale of housing development' supported by NPPF
- not subject to any local or national conservation designations
- Not a designated area of green space.
- The site is not at risk of flooding
- The site does not fall within the Addingham Conservation Area, nor is it within its setting
- Site is deliverable, assist in delivering 5-year housing land supply
- Site is currently Green Belt, however the site does not significantly damage the purposes and integrity of the Green Belt. Given the particular characteristics of the site potential for sprawl into open countryside considered to be low. The urban edge setting, the enclosure of the A65, the peripheral tree belt and the adjacent built form all contribute to the site being visually contained.
- Mature trees and drystone walling to be retained
- Installation of SuDS
- The site is deliverable, a which will assist in delivering 5-year housing land supply.

2. Environment

- Greenfield site but with relatively low biodiversity value except along the boundaries. Acceptable as a housing site, subject to an ecological survey to identify any biodiversity concerns and mitigate impacts

- Mature boundary trees and drystone walls should be retained and a wide riparian zone along the beck on the northern boundary will need to be created
- Support subject to ecological survey

3. Highways

- Moor Lane has been improved through the recent development and includes street-lighting, utilities and is moving towards adoption; site can utilise existing connections to the highway network.

Comments:

1. Environment

- If developed there should be traffic calming incorporated and upgrading the existing recreational space nearby
- Installation of SuDS on this site is especially important in view of the proximity of the beck and the incidence of flooding at properties further down Moor Lane
- Site is within flood zone 1. Water discharge rates post development should be restricted to the pre development discharge rate. For developments near ordinary watercourses recommend an 8 metre easement strip along the length of the riverbank. Consideration must be made to making space for water and providing betterment in terms of flood risk management where ever possible

2. Housing

- The village map showing the suggested sites is out of date and does not show any of the housing developments during this period
- AD6/H the site can utilise existing connections to the highway network. The pro forma criteria should be amended to reflect this.
- Site is identified for 24 dwellings. However, based on recent designs it is considered the site can accommodate approximately 30 units whilst integrating high-quality design

3. General

- concern about the level of traffic on the two feeder roads, being Moor Lane and Moor Park Drive that would undoubtedly increase massively.
- The residents in the bungalows, by their very nature are mainly of the older generation and as well as the actual risk of accidents, the increased level of pollution would adversely effect their health and well being.

Representation IDs: 528, 612, 709, 898, 1249, 1397, 1582, 1606, 1626, 1643, 1688, 1695, 1709, 1765, 1780, 1825, 1938, 2029, 2187, 2240, 2328, 2344, 2413, 2475, 2566, 2622, 2628, 2642, 2696, 2719, 2724, 2783, 2794, 2799, 2809, 2880, 2919, 2937, 2964, 3131, 3185, 3229, 3266, 3305, 3325, 3441, 3473, 3493, 3550, 3582, 3617, 3619, 3879, 3921, 3961, 3983, 4019, 4043, 4136, 4142, 4154, 4245, 4254, 4272, 4339, 4356, 4364, 4377, 4380, 4382, 4450, 4581, 4605, 4662, 4860, 4914, 4922, 5026, 5035, 5089, 5280, 5388, 5445, 5757, 5834, 6038, 7824, 8007, 8143, 8717, 8821, 9866, 9884, 9889, 10035, 10079, 10132, 10193, 10426, 10761, 10764, 10767, 11257, 11319, 11420, 11551, 11750, 11796, 11800, 11985, 12008, 12108, 12188, 12213, 12235, 12293, 12793, 12797, 12931, 12977, 13206, 13467, 14015, 14209, 14241, 14243, 14253, 14301, 14495, 14582, 15672, 16132, 16244, 16623, 16691, 16752, 16860, 16868, 16998, 18065, 18148, 18252, 18721, 19614, 19631, 19823, 19843, 20017, 20047, 20054, 20070, 20077, 20097, 20133, 20376, 20437, 20448, 20749, 20764, 21018, 21044, 21159, 21176, 21375, 21391, 21603, 21666, 22052, 24232, 24613, 24912, 25073, 25243, 25508, 28251, 28609, 29506, 29531, 30030, 30272, 30291, 30320, 30333, 30338, 30342, 30346

AD7/H: Turner Lane/Silsden Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
AD7/H - Turner Lane/Silsden Road	169	159	160	4	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Site availability • Proposed density • Environmental issues and wildlife impact • Ecology and trees • Loss of Green Belt land • Impact on heritage and conservation area • Impact on local infrastructure and services • Impact on highways network • Impact on local character and landscape • Site access • Size of site • Impact on health • Proposed site density • Flood risk and water quality • General support • General comments and environment	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H25) is not carried forward as a preferred option and rejected. Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of representations
Objections:
1. Site availability • Two of the fields are not available for sale • Site AD7/H as allocated is made up of three separate fields. Confirmation has been received from the owner that they • will not make this land available for development • We own two fields on the plan. This is in the green belt and we wish to retain our land as an open space. We do not intend to sell and the site is therefore not available for development.
2. Impact on local infrastructure: • Site is a distance from local facilities and is unsustainable. 1.4km from village centre up hill. The site not accessible to public transport and will be car dependent. • impact of development on local infrastructure including primary/secondary school capacity, drainage on Moor Lane. Exacerbate existing poor drainage and inadequate sewers • Too many houses allocated to Addingham as a village/Local Service Centre, with limited employment, infrastructure and no secondary school • Poor drainage • natural springs on site • Public transport is limited. Will increase car journeys with increased noise, congestion and pollution. • Lack of employment • Utility supplies are not sufficient.
3. Impact on the local highway network: • Highways- impact on local highway/pedestrian safety, in particular increase the traffic on Moor Lane Turner lane and Moor Park drive. Impact on congestion on the village. Impact on junction of Old Skipton Road
4. Location of the proposed site access:

- If the site were accessed from Silsden Road this would minimise the impact of the proposed development. Other options for access are too narrow to allow two-way traffic due to parked cars. Additionally, they are not gritted and are impassable during poor weather.
- Access is poor. Will increase traffic on Moor Lane, where speed is already an issue, posing a safety risk.

5. Impact on local character:

- Loss of views, green agricultural gateway setting to village, - loss of rural character- quiet semi rural roads with very little traffic greatly enjoyed for walking routes
- Impact on public footpath
- Green Field site made up of three parallel linear fields, separated by dry stone walls. There are many mature trees, hedgerows, and a deciduous woodland (priority habitat) on the adjacent land to the east (on the Silsden Road Recreation Ground). visible from Silsden Road and the recreation ground so would diminish the rural village character

6. Flood risk/water quality

- Impact of development on local surface water flood risk and Marchup Beck, additional problems with drainage and loss of greenfield to store flood water. Site has poor drainage and natural springs. Impact on river quality including the Wharfe
- Flood risk issues as the current drainage system cannot cope with existing housing.

7. Wildife/Ecology

- impact on the adjacent nature reserve, though risk to water quality, and light pollution
- It is rich in wildlife with regular sightings of owls, bats,
  rabbits, squirrels, voles etc and is an intrinsic part of the ecosystem formed by these interlinking areas on the village fringe.
- The site is within 2.4 km from the nearest edge of the South Pennine Moors SPA/SAC (European Site) and is therefore subject to the 2.5 km zone of influence as highlighted in the Habitat Regulations Assessment
- Loss of valued flora and fauna, barn owls, tawny owls, curlews, lapwings and a colony of bats.
  No felling of trees

8. Impact on Health

- impact on future amenity from traffic on the A65- noise/pollution from construction work
- Non compliance with Bradford Council policy on zero carbon future.

9. Proposed density/level of development:

- Density of housing proposed is disproportionate to the road access.

10. Development of greenfield/Green Belt land:

- Loss of open/green space/Green Infrastructure- Site forms part of a valued open greenspace on a key gateway to the village, which is important GI corridor and for the for setting of Addingham village. Impact on loss of hedgerows/trees along boundaries
- Impact on Green Belt-, countryside encroachment, urban sprawl and major impact on openness, potential for sprawl to the open boundary to the north. Exceptional circumstances not demonstrated as alternative brownfield sites available
- The site adjacent to the telephone exchange has lain unused for years and this together with the fields next to the cricket pitch could be sustainable locations close to the village with little impact on the countryside.

Support:

1. General Support

- If there have to be more houses in Addingham, this site is less precious from a greenbelt and environmental perspective.
- Access also appears less problematical- site has good road access to the A65 via the B6160
- Agent- welcome the allocation of this site for housing development.
- The site is well contained by field boundaries and mature trees along the boundaries. It is well related to the settlement of Addingham and well served by public transport and is adjacent to playing fields
- This site is available for development in the short term to meet the area's housing requirements

Comments:

1. General Comment

- Two of the three strips of land the owners have stated categorically that they will not be released for building. impractical to consider the remaining narrow strip of land.
- We can see the logic of this site and provided that suitable conservation measures are taken, its proximity to the bypass would make it an acceptable development site.
- Whilst we accept that the development of any one of these site is acceptable, we would question the development of all of them as the cumulative impact would, we feel, be too great.
- Sites 1, 2 , 6, & 7 represent an infill of 81 houses and are too densely clustered in a small area at the western edge of Addingham. Infrastructure problems will be caused by excess traffic, limited and difficult access, drainage, flood risk etc.

2. **Environment**
    - Site is within flood zone 1. Water discharge rates post development should be restricted to the pre development discharge rate. For developments near ordinary watercourses recommend an 8 metre easement strip along the length of the riverbank. Consideration must be made to making space for water and providing betterment in terms of flood risk management where ever possible

Representation IDs: 118, 610, 710, 899, 1273, 1398, 1583, 1607, 1616, 1629, 1704, 1766, 1781, 1830, 1940, 2032, 2189, 2241, 2331, 2347, 2480, 2623, 2629, 2643, 2677, 2699, 2720, 2725, 2788, 2802, 2810, 2886, 2939, 2969, 3133, 3230, 3264, 3314, 3328, 3391, 3436, 3442, 3453, 3456, 3495, 3583, 3620, 3622, 3882, 3925, 3962, 4002, 4020, 4044, 4117, 4138, 4143, 4178, 4244, 4279, 4295, 4331, 4340, 4347, 4357, 4366, 4385, 4452, 4586, 4607, 4663, 4872, 4877, 4928, 5032, 5059, 5101, 5283, 5393, 5444, 5448, 5853, 6039, 7825, 8589, 8765, 8822, 9867, 9885, 9890, 10036, 10080, 10194, 10427, 10762, 10765, 10768, 10825, 11258, 11421, 11552, 11749, 11797, 11986, 12009, 12114, 12214, 12236, 12294, 12794, 12798, 12934, 12978, 13207, 13468, 14019, 14210, 14242, 14302, 14583, 15673, 16133, 16245, 16624, 16692, 16756, 16869, 18032, 18145, 18722, 19615, 19632, 19824, 19844, 20048, 20055, 20071, 20076, 20098, 20134, 20142, 20326, 20377, 20438, 20449, 20748, 20765, 21019, 21045, 21160, 21177, 21376, 21392, 21667, 22170, 24233, 24913, 25074, 25244, 26534, 28252, 28610, 29507, 29527, 30031, 30283, 30321, 30339, 30340

AD8/H: Church Street/Main Street

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
AD8/H - Church Street/Main Street	65	18	21	38	6

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local infrastructure • Local highways network • Site access • Flood risk/water quality • Impact on local character • Impact on surrounding areas and residents • Density of development • Heritage • General support • Comments on heritage and environment	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H26 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations:
Objections:
1. **Impact on local infrastructure**: • Impact of development on local infrastructure including primary/secondary school capacity, doctors • Issues with pressure on drainage system

2. Impact on the local highway network • Increase of traffic/congestion on local highways • Even if the access is from School Lane it will still impact on the school run down the cinder path running adjacent to Burns Hill
3. Location of the proposed site access: • Junction with Ilkley Road is dangerous
4. Flood risk/Water Quality • The combined sewage and drainage system is already overwhelmed. Impact on river quality including the Wharfe. • Site is in flood zone 2
5. Impact on Local Character: • Impact on local character- prominent gateway site with mature trees. The proposal would significantly change the character of the entrance into the village • Impact on views from Abbey Close • Impact on trees • The site is located adjacent to the Addingham • Conservation Area and south-west of two Grade II Listed Buildings, Hallcroft Hall and Ashgate House. The development of this area could harm elements which contribute to the significance of these designated heritage assets.
6. Impact on surrounding area and local residents: • This area should be improved but not for housing as it would be an eyesore upon entry to the village- site should be used for children's facilities- skate park/recreation
7. Proposed density/level of development: • 8 houses considered too many
8. General • There are many more appropriate brownfield sites and redundant commercial, premises nearby that could be adapted, in nearby towns, Keighley, Shipley, Bradford.

- Non compliance with Bradford Council policy on zero carbon future.

Support:

1. **General Support**

- Support development of unsightly site
- Site would have low impact on road
- Brownfield site
- Access point of view the least disruptive site
- Site is level and a short walk from the village
- Impact on wildlife is low
- On the local bus route
- Underutilised site make better use if done in keeping with village
- Little impact on wildlife
- May need further amenities in village to cater for site
- the site is located within the 7 km buffer of one of the SPA/SACs rather than the 2.5 km zone in which all the other preferred sites are located in. It should be noted that site AD/013 is also within the 7 km buffer zone rather than the 2.5 km zone.
- is a Brownfield site. It is acceptable for housing subject to:

• an ecological survey to identify & mitigate any environmental impacts identified; and

• the retention of mature trees along the boundary, especially the trees along the front of the plot that contribute to the local street character and those to the rear (west) of the site that form the boundary with the newly planted hedge in Hofmann Wood Field.

Comments:

1. **Environment**

- An ecological survey is required to identify & mitigate any environmental impacts identified
- Mature trees along the boundary, especially along the front that contribute to the local street character and those to the rear (west) should be retained
- Site presents an opportunity to self build,

• Environment Agency- Site contains overland FZ2 significant development could impact overload flows Development on site should follow a sequential layout so as to prevent unnecessary development within Flood Zones 3b, 3 and 2 wherever possible. If the site is considered Brownfield then there should be a 30% reduction in surface water discharges, or restricted to Greenfield rates, there should be no increase in brownfield surface water discharge rates post development. Development must be shown to be safe for the lifetime of the development .Consideration must be made to making space for water and providing betterment in terms of flood risk management wherever possible • It is likely these sites are going to show changes/increases in flood risk as a result of climate change.
2. Heritage • Historic England- Conservation Area and south-west of two Grade II Listed Buildings, Hallcroft Hall and Ashgate House. The development of this area could harm elements which contribute to the significance of these designated heritage assets. Before allocating this site for development: An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity.

Representation IDs: 611, 900, 1628, 1782, 1832, 1942, 2033, 2188, 2243, 2630, 2631, 2644, 2679, 2701, 2793, 2814, 2888, 2942, 3134, 3272, 3319, 3454, 3490, 3496, 3586, 3625, 3626, 3884, 3963, 4021, 4144, 4266, 4281, 4388, 4453, 4589, 4668, 4875, 4879, 4916, 4934, 5024, 5040, 5050, 5062, 5079, 5290, 5292, 5449, 5868, 9886, 10428, 12010, 13367, 16695, 16753, 18552, 18901, 20135, 20450, 24234, 28611, 29419, 30035, 30277

A total of **73** representations were received in relation to Question 117 from **68** respondents. Respondents included Highways England, local residents, the NHS and a house builder.

(below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Error! Reference source not found.**.

Table 84.5: Consultation Question 117: Addingham Preferred Site Allocations - Overview of Representations Received

Consultation Question 117 - Addingham Preferred Site Allocations

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
117	73	68	61	2	10

Table 84.6: Consultation Question 117: Addingham Preferred Site Allocations - Summary of Representations Received

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Location of sites • Existing permissions and recent development • Levels of housing • Drainage and flooding • Infrastructure • Habitats and wildlife • Development on Green Belt land • Heritage • Environmental concerns • Impact on heritage • Conflicts with Addingham Neighbourhood Development Plan	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

• Alternative sites • General support • General comments	

Summary of Representations:
Objections
1. Location of sites: • All suggested preferred option development sites (aside from AD5/H) are located on the south side of the settlement boundaries, essentially abutting the bypass and a considerable distance from the services and facilities of Addingham Local Centre • Preferred option sites will not deliver sustainable development- other options being promoted in sustainable locations • Overdevelopment of the west of the village, which is located a long distance from local amenities impacts on local highways • Development of the "Sailor Fields" between the village and the A65 bypass will destroy the linear nature of the village and the setting of its 129 listed buildings and monuments. It will also negatively impact the distinctive Dales landscape and bring new development into the South Pennine SAC/SPA Protection Zone
2. Existing permissions and recent development: • Recent and imminent builds, including those off Moor Lane, must be taken into account
3. Housing • Excessive number of houses proposed • Does not state why Addingham housing numbers have increased • Not affordable housing
4. Drainage and Flooding • Inadequate sewerage systems and sewage treatment • The current infrastructure cannot cope • Surface water flooding an issue for Addingham • Increase in flood risk will be of detriment to existing properties.

- Drainage cannot cope
- Pollution from increase of surface water flooding and will add pressure to local sewer capacity which leads in to River Wharfe

5. Infrastructure

- School is at capacity
- Oversubscribed health centre

6. Habitats

- Impact on wildlife
- AD3/H and AD4/H are a highway for wildlife with many different species present

7. Highways

- Additional traffic to Big Meadow Drive
- Road access; safety will be an issue.
- Increase in traffic and congestion
- Traffic volume would increase
- a new access road from School Lane, which would lead to increased traffic on Chapel Street and Back Beck Lane
- The proposed access for site AD3 will exacerbate the significant existing road safety issues around the junctions of 1) Bolton road and Main Street 2) old station way and main st and 3) old station way and ridley fold and 4) old station way and west croft This would be a significant issue both 1) during construction and 2) once the residences are in place

8. Green Belt

- Green Belt on Southfield Road should not be built on
- Green Belt should not be developed
- Development of the two Main Street sites AD3/H and AD4/H would be a significant infringement of the Green Belt and result in damage to the ecology of the village.

9. Environment

- Site AD3 and site AD4 have ancient hedgerows and trees
- Housing will affect popular walking routes

- Proposed area land adjacent Turner Lane is a gateway for walkers. It forms part of the Dales High Way and will completely transform the western side of the village.
- Increase in pollution from cars
- Reduction in green spaces with development

10. Heritage

- Development will affect historical character of the village

11. Alternative site

- Areas such as the 'old motel' brownfield site on Ilkley Rd. / Main Street would have less environmental impact and be closer to village facilities and should be consider above any green belt.
- The site AD/005 that was rejected in the centre of the village is a far better site for development even though it is on greenbelt. why not build to the south at the old Ilkley Road between its junction with Church Street and Old Lane
- Proposed new housing site - Motel Site, Ilkley Rd / Main Street Addingham
- Request that AD/013 is allocated within the Publication draft as it represents sustainable development.

12. General Comment

- Non compliant with Addingham NDP
- Object to proposed building on land adjacent to Turner Lane, Parsons & Moor Lane.
- Recommend a full reassessment of the SHLAA
- AD7/H is designated green belt and should not be considered as development site.

Support

- Supportive of the Addingham Local Area Strategy and Plan. In particular, support Site AD6/H as a preferred allocation and its release from the Green Belt

- Support subject to ecological study

- Support for sites AD3/H and AD4/H

Comments
• Potential new site - on the road out towards Ilkley there was once a garage, why not build on that site, where access is already in place?
• The new “Motel” site proposed at Ilkley Road would reuse a brownfield, previously developed site,
• Protect blue/green corridors in village
• Crown Inn and Craven Heffer - alternative site
• Housing figures for Addingham should not increase from 75. Inadequate infrastructure, environmental impact and should not develop Green Belt.
• The council should revisit reassessing AD005 as a suitable alternative (to AD7/H) which has far less impact on the green belt in an accessible location.
• Highest environmental standards to be guaranteed on development • Homes to built to net zero carbon standards • Surface water flooding needs managing • Biodiversity net gain to protect existing habitats
• Brownfield sites should be developed upon • There are sites in Addingham, such as the Old School site which was originally designated for 35 houses. This site is overgrown scrub land and close to the village centre and could be rejuvenated. • The site adjacent to the telephone exchange has lain unused for years and this together with the fields next to the cricket pitch could be sustainable locations close to the village with little impact on the countryside.
• Sites 1, 2 , 6, & 7 represent an infill of 81 houses and are too densely clustered in a small area at the western edge of Addingham. Infrastructure problems will be caused by excess traffic, limited and difficult access, drainage, flood risk etc

Representation IDs: 193, 461, 704, 892, 901, 1284, 1401, 1515, 1578, 1619, 1691, 1837, 2054, 2235, 2256, 2609, 2625, 2638, 2686, 2764, 2816, 2833, 2912, 3368, 3564, 3827, 3844, 3847, 3948, 4012, 4039, 4073, 4079, 4097, 4164, 4332, 4431, 5247, 5275, 6092, 6150, 7808,

11433, 11801, 11823, 11825, 12062, 12211, 14496, 15506, 15829, 16542, 16757, 18216, 18900, 20140, 20143, 20319, 21388, 23661, 24601, 25502, 26530, 29009, 29816, 30036, 30260, 30314, 30323, 30324, 30334, 30351, 30359

2.85. BURLEY IN WHARFEDALE

Introduction

The Local Plan settlement hierarchy identifies Burley in Wharfedale as one of Bradford District's 5 Local Growth Centres. The settlement is considered to be a sustainable location for housing growth and based on this it is proposed that the settlement has a housing target of 625 dwellings. Two site allocations were proposed to deliver the development requirements.

Local Area Strategy

The Local Plan provides a portrait of Burley in Wharfedales characteristics and sets out a Local Area Strategy for its future growth and development, the key elements of which include:

- The identification of two new housing sites which will provide market and affordable housing and support services and facilities within the designated local centre and will deliver 610 new homes alongside others with current planning permission.
- Providing a balanced range of housing including older peoples housing and supporting additional affordable housing delivery.
- Maintaining a strong focus upon green infrastructure and engraining new and enhanced open space within new residential development schemes
- Supporting additional infrastructure delivery and local shops and facilities
- Supporting safe active travel routes (cycling and walking) through neighbourhoods, to services and facilities and the railway station, including the delivery of the Wharfedale Greenway.

Summary of Consultation

The Local Area Strategy was listed as Question 118 within the Preferred Options document. A total of **243** representations were received in relation to the Burley in Wharfedale Local Area Strategy from **219** respondents. Respondents included Highways England, Historic England, local residents, local interest groups, land/site promoters, and the Parish Council. Table **85.1** provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in Table **85.2**.

Table 85.1: Consultation Question 118: Burley in Wharfedale Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
118	Burley in Wharfedale Portrait & Local Area Strategy	243	219	232	1	10
	Totals	**243**	**219**	**232**	**1**	**10**

Consultation Question 118 Burley in Wharfedale Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
118	Burley in Wharfedale Portrait & Local Area Strategy	243	219	232	1	10

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Levels of growth, sites and density • Development on Green Belt Land • Impact on local infrastructure and services • Impact on heritage and character • Flood risk • Impact on habitats and wildlife • Impact on health • Comments on housing growth and local facilities	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy BU1: Burley, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Table 85.2: Summary of Representations Received – Burley in Wharfedale Portrait & Local Area Strategy

Summary of Representations
Objections
1. Level of housing growth, sites and density: • The Housing requirement is too high- too many houses are proposed for the size of the village • The 2021 Census results should be used to make decisions on future plans, making plans based on out-of-date information is seriously flawed • Whilst the Regional City should be the main focus for housing delivery the quantum of housing should be reduced to a more realistic level (60%) with additional houses distributed to the Local Growth Centres such as Burley in Wharfedale where there are no deliverability constraints
2. Development on Green Belt land:

Summary of Representations
• Impact on the Green Belt- specifically urban sprawl, impact on openness and countryside encroachment - no exceptional circumstances have been demonstrated as there are sufficient brownfield sites in alternative areas • Development of proposed green belt housing sites not justified by exceptional circumstances- alternative brownfield site options available
3. Local infrastructure/services: • Impact of no. of homes proposed on insufficient local infrastructure such as local doctors • The impact of the number of homes on local schools which are oversubscribed • Impact of proposed development on the local highway network/road safety and impact on congestion- - Local streets will not support the additional traffic caused. • There are limited employment opportunities in the area
4. Heritage and character • The impact of proposed developments on the historic local village character/conservation areas
5. Flood Risk: • Impact of proposed development on local flood risk, in particular surface water flood risk.
6. Habitats & Wildlife: • Impact from the development on local wildlife habitats • Lack of protection for local wildlife in the plan
7. Health • Impact on health due to loss of greenspace
Support
• Support for the increased distribution to the centre, given its sustainability
Comments
1. Overall distribution of housing growth: • The majority of new housing is to be delivered across two sites to the west of the of the settlement. This strategy limits choice for the local residents. The site at Hag Farm Road is well contained and would form a natural extension to the settlement to provide a mix of use in accordance with the Neighbourhood Plan. The allocation of this site will ensure the delivery of a mix of sites to provide market and affordable housing and support services and facilities in the settlement.
2. Local facilities

Summary of Representations
• There are a number of inaccuracies which need to be resolved 1. Post Office(s) – it has one, part time, no leisure centre, the closest secondary schools are oversubscribed. Wharfedale Hospital only offers limited facilities and is not accessible by public transport

Representation IDs: 5, 9, 256, 323, 328, 342, 410, 453, 581, 722, 760, 835, 840, 937, 1319, 1680, 1810, 1883, 1929, 2051, 2345, 2451, 2554, 2705, 2945, 2954, 2955, 3006, 3033, 3148, 3196, 3203, 3248, 3318, 3418, 3429, 3472, 3543, 3555, 3581, 3752, 3823, 3858, 4033, 4158, 4205, 4277, 4303, 4421, 4432, 4451, 4482, 4486, 4488, 4528, 4553, 4562, 4604, 4687, 4718, 4901, 5154, 5223, 5356, 5372, 5376, 5381, 5397, 5522, 5571, 5659, 5863, 5929, 9666, 9669, 10190, 10225, 11416, 11462, 11463, 12079, 12125, 15507, 15929, 17703, 20824, 21621, 21702, 21830, 21904, 21933, 21962, 21991, 22020, 22049, 22081, 22110, 22139, 22168, 22208, 22237, 22266, 22295, 22324, 22353, 22382, 22493, 22522, 22551, 22580, 22618, 22647, 22676, 22705, 22734, 22763, 22766, 22807, 22836, 22874, 22903, 22932, 22961, 22990, 23019, 23048, 23077, 23133, 23162, 23191, 23220, 23249, 23278, 23307, 23336, 23365, 23394, 23423, 23452, 23627, 23816, 24139, 24183, 24222, 24335, 24364, 24393, 24422, 24453, 24482, 24567, 24596, 24645, 24720, 24758, 24787, 24865, 24888, 24890, 24952, 24981, 25010, 25040, 25070, 25104, 25114, 25155, 25209, 25238, 25240, 25310, 25398, 25450, 25499, 25728, 25757, 25786, 25815, 25844, 25873, 25902, 25931, 25960, 25989, 26018, 26047, 26076, 26105, 26134, 26163, 26192, 26221, 26250, 26279, 26309, 26344, 26373, 26586, 26701, 26733, 26776, 26819, 26848, 26877, 26906, 26935, 26966, 26995, 27027, 27056, 27085, 27138, 27167, 27196, 27225, 27254, 27286, 27315, 27344, 27373, 27402, 27431, 27460, 27582, 27707, 27741, 27814, 27845, 27909, 27924, 28166, 28208, 28298, 29028, 29033, 29231, 29233, 29584, 29586, 29624, 30023, 30104, 30187

Sites

As highlighted above, 2 sites and were put forward in the Preferred Options document to meet the proposed housing development requirement for Burley in Wharfedale. Under Q119 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **309** representations were received in relation to the Burley in Wharfedale site allocations from **301** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents, landowners, organisations and Parish/Town Council. Table **85.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in Table **85.4**.

Table 85.1: Burley in Wharfedale Proposed Sites (BU1/H to BU2/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BU1/H – Sun Lane, Ilkley Road	104	101	100	1	3
BU2/H – Scalebor House, Moor Lane	205	200	201	1	3
Totals	**309**	**301**	**301**	**2**	**6**

Table 85.4: Burley in Wharfedale (BU1/H to BU2/H) - Summary of Representations Received

BU1/H: Sun Lane, Ilkley Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BU1/H – Sun Lane, Ilkley Road	104	101	100	1	3

Headline Summary	Councils Response
Representations focused upon the following key issues: • Development on Green Belt Land • Impact on local infrastructure and services • Impact on local highways network • Size of development • Lack of employment sites • Flood risk • Impact on habitats and wildlife • Impact on heritage • Support of site allocation • Comments on agricultural land and flood risk	This site is under construction and is identified as H110 in the Regulation 19 Local Plan.

Objections:

1. **Development of greenfield/Green Belt land**:
   - Site is a valued open space;
   - No exceptional circumstances have been demonstrated;
   - Concern that neighbouring villages/towns will become joined;
   - Brownfield sites should be prioritised for building new homes

2. **Impact on local infrastructure/services:**
   - Concern that associated amenities/infrastructure may not be delivered and that existing infrastructure is insufficient to support this level of growth

• Educational facilities are of particular concern
3. Impact on the local highway network: Impact from additional cars onto the local road network (the A65) given lack of a proper footpath and impact on safety of school children
4. Size of development Development is considered to be disproportionately large
5. Local employment sites Lack of local employment sites resulting in additional vehicle commuting trips
6. Flood Risk The site is prone to flooding
7. Wildlife Area of importance for local wildlife
8. Heritage The site is located close to the Burley in Wharfdale Conservation Area and surrounds Black Bull Farm House and associated outbuilding, both of which are Grade II listed Buildings.
Support:
1. Site Allocation Site allocation is welcomed.
Comments:
1. Agricultural Land The allocation is on valuable agricultural land and any allocation of 5ha should have an ALC survey (Natural England)
2. Flood Risk Site contains Flood Zone 2 and 3 with 3b/a within site boundary. Development on site should follow a sequential layout so as to prevent unnecessary development within Flood Zones 3b,3 and 2 wherever possible. If the site is considered Greenfield then surface water discharge rates post development should be restricted to the pre development Greenfield discharge rate (Environmental Agency).

Representation IDs: 126, 255, 274, 329, 392, 531, 582, 687, 713, 837, 842, 939, 1477, 1653, 1682, 1869, 1887, 2353, 2556, 2669, 2736, 2978, 3009, 3199, 3205, 3218, 3323, 3390, 3444, 3575, 3590, 3730, 4040, 4161, 4216, 4288, 4316, 4369, 4460, 4478, 4480, 4500, 4556, 4643, 4690, 4779, 4804, 4829, 5099, 5158, 5172, 5232, 5271, 5300, 5361, 5373, 5374, 5396, 5399, 5483, 5543, 5579, 5633, 5662, 5864, 5881,

6043, 6088, 6105, 8134, 8135, 11263, 11981, 12001, 12333, 15601, 15676, 15930, 16620, 17326, 17470, 19384, 19387, 19912, 20144, 21021, 21281, 22171, 22386, 22387, 24887, 25012, 25422, 25454, 26447, 26622, 26997, 27087, 27256, 27863, 28068, 28616, 29420, 30312

BU2/H: – Scalebor House, Moor Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
BU2/H – Scalebor House, Moor Lane	205	200	201	1	3

Headline Summary	Councils Response
Representations focused upon the following key issues: • Impact on local infrastructure and services • Site availability • Site access • Impact on highways network • Loss of wildlife and trees • Impact on health • Loss of trees and wildlife • Impact on health • Loss of Open space • Development of Green Belt land • Flood risk and drainage • Support of site allocation • Comments on wildlife and Green Belt	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H1347) is not carried forward as a preferred option and rejected. • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:
1) Impact on local infrastructure/services: • Distance from amenities in the village
2) Site availability

- Site is not available – it is protected by a legal covenant for grazing

3) Site access

- Poor/constrained access- John Filson Rise is inappropriate and Ron Lawtons Crescent is too narrow because of pedestrian access and parking issues

4) Impact on the local highway network:

- Impact from additional cars onto the local road network given lack of a proper footpath and impact on safety of school children

5) Wildlife Corridor & Trees

- Site is a valued wildlife corridor- contains protected species
- Loss of mature trees

6) Impact on health

- Loss of site will impact on health

7) Development of greenfield/Green Belt land:

- Site is a valued open space
- No exceptional circumstances have been demonstrated - alternative brownfield sites are available including Greenholme Mills

8) Flood risk

- The undeveloped nature of the site is important for retaining water and reducing the volume of water entering the drainage system/river- it also floods but this is not recognised on the flood maps

Support:

1) Site Allocation

- Welcome the allocation of the site- but the site boundary needs to be amended to include the whole site for specialist housing which is supported by the parish council

Comments:

1) Wildlife

- The site lies within the proximity if the south Pennine Moors SPA and its development could potentially lead to loss of functional land for SPA birds. Where loss of functionally linked land cannot be ruled out at this stage we recommend that allocation requirement text in the plan sets out survey and mitigation requirements clearly

2) Green Belt

- The site is unsuitable in Green Belt terms on the basis that it breaches the railway line, which provides a strong and defensible boundary to Burley-in-Wharfedale, and would conflict with the purposes of including land within it by creating sprawl and encroachment into the countryside.

3) Access/Highway

- No suitable access can be delivered as the road is private and has poor visibility onto Moor Lane

Representation IDs:15, 200, 297, 375, 583, 686, 838, 843, 935, 958, 1120, 1318, 1450, 1683, 1696, 1718, 1786, 1788, 1797, 1798, 1807, 1817, 1853, 1865, 1867, 1868, 1888, 1892, 1894, 1895, 1898, 1943, 2008, 2017, 2056, 2065, 2066, 2067, 2157, 2158, 2161, 2254, 2276, 2287, 2349, 2366, 2376, 2411, 2505, 2559, 2567, 2575, 2576, 2577, 2610, 2632, 2667, 2668, 2671, 2673, 2678, 2700, 2727, 2738, 2748, 2754, 2829, 2872, 2885, 2929, 2932, 2944, 2957, 2959, 2962, 2974, 2980, 2985, 3034, 3042, 3045, 3137, 3154, 3174, 3200, 3207, 3219, 3220, 3252, 3332, 3371, 3393, 3400, 3411, 3412, 3415, 3422, 3423, 3426, 3446, 3529, 3541, 3544, 3547, 3548, 3554, 3578, 3588, 3599, 3606, 3623, 3634, 3636, 3731, 3750, 3751, 3804, 3824, 3895, 3905, 3947, 3980, 4001, 4065, 4162, 4191, 4233, 4263, 4291, 4346, 4363, 4374, 4415, 4419, 4422, 4429, 4433, 4461, 4479, 4492, 4496, 4507, 4510, 4521, 4529, 4548, 4554, 4571, 4573, 4609, 4629, 4652, 4656, 4719, 4756, 4783, 4787, 4792, 4793, 4805, 4820, 4821, 4825, 4852, 4919, 4938, 4963, 4979, 5110, 5161, 5168, 5174, 5209, 5229, 5273, 5287, 5326, 5375, 5395, 5404, 5575, 5587, 5964, 6044, 8157, 10997, 11393, 12002, 15949, 16540, 17006, 17327, 17529, 18244, 18488, 19385, 19388, 19881, 21604, 22388, 24892, 28303, 28598, 28617, 29031

A total of **186** representations were received in relation to Question 119 from **180** respondents. Respondents included Highways England, local residents, the parish council and a site promoter. **Error! Reference source not found.** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Error! Reference source not found.**.

Table 85.5: Consultation Question 119: Burley in Wharfedale Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
119	186	180	183	0	3

Table 85.6: Consultation Question 119: Burley in Wharfedale Preferred Site Allocations - Summary of Representations Received

Question 119 – Burley in Wharfedale Preferred Site Allocations

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Location of sites • Level of development • Impact on infrastructure • Comments on impact on highways network	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

Summary of Representations
Objections
1. Location of sites: • Sites are not well located and will not deliver sustainable development - • Impact on local wildlife and habitat • Green belt sites should be removed from the plan with brownfield sites identified instead • Site will not deliver affordable housing
2. Level of development • The proposed Scalebor allocation would take housing delivery in Burley in Wharfedale above the identified need.

Summary of Representations
• The Sun Lane site is sufficient to meet the needs of Burley in Wharfedale • Number of and location of homes will impact on Burleys unique landscape setting
3. Infrastructure • Impact on infrastructure; insufficient parking around the station; No proposals to increase school capacity • Capacity on trains too limited to service proposed new developments
Comments
1. Highway Network • It is not considered that locating development within the settlements within Burley in Wharfedale, on their own, will have a severe impact on the capacity, operation and safety of the Strategic Road Network

Representation IDs: 324, 455, 580, 764, 836, 841, 938, 1681, 1886, 1893, 1930, 2052, 2089, 2323, 2348, 2539, 2555, 2660, 2704, 2987, 3475, 4037, 4160, 4441, 4458, 4481, 4491, 4493, 4896, 4984, 5166, 5180, 5231, 5255, 5389, 5394, 5577, 5792, 11467, 15508, 17704, 21501, 21831, 21905, 21934, 21963, 21992, 22021, 22050, 22082, 22111, 22140, 22169, 22209, 22238, 22267, 22296, 22325, 22354, 22383, 22494, 22523, 22552, 22581, 22619, 22648, 22677, 22706, 22735, 22764, 22808, 22837, 22875, 22904, 22933, 22962, 22991, 23020, 23049, 23078, 23134, 23163, 23192, 23221, 23250, 23279, 23308, 23337, 23366, 23395, 23424, 23453, 23628, 24140, 24184, 24223, 24336, 24365, 24394, 24423, 24454, 24483, 24568, 24597, 24646, 24721, 24759, 24788, 24866, 24891, 24953, 24982, 25011, 25041, 25071, 25105, 25156, 25210, 25239, 25314, 25451, 25500, 25729, 25758, 25787, 25816, 25845, 25874, 25903, 25932, 25961, 25990, 26019, 26048, 26077, 26106, 26135, 26164, 26193, 26222, 26251, 26280, 26310, 26345, 26374, 26587, 26702, 26734, 26777, 26820, 26849, 26878, 26907, 26936, 26967, 26996, 27028, 27057, 27086, 27139, 27168, 27197, 27226, 27255, 27287, 27316, 27345, 27374, 27403, 27432, 27461, 27583, 27708, 27742, 27815, 27846, 27910, 28209, 28299, 29232, 29585, 29625, 30024, 30039, 30105, 30188

2.86. ILKLEY

Introduction

The Local Plan settlement hierarchy identifies Ilkley as one of Bradford District's 3 Principal Towns. Based on this it is proposed that the settlement has a housing target of 300 dwellings. A total of four site allocations were proposed to deliver the development requirements.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Ilkley characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities and its role as a tourist hub. The provision of better sustainable transport options and connections between the town and surrounding settlements, including the delivery of the Wharfedale greenway as well as enhancing the natural and built environment and the protection of important open spaces and wildlife networks particularly the south Pennine moorland and the River Wharfe. This was listed as question 120 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Councils website

Summary of Consultation

A total of **264** representations were received in relation to the Ilkley Local Area Strategy from **251** respondents. Respondents included Highways England, Historic England, local residents, local interest groups, land/site promoters, and the Parish Council. Table **86.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in Table **86.2**.

Table 86.1: Consultation Question 120: Ilkley Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
120	Ilkley Portrait & Local Area Strategy	264	251	215	16	33
	Totals	**264**	**251**	**215**	**16**	**33**

Table 86.2: Ilkley Portrait & Local Area Strategy - Summary of Representations Received

Consultation Question 120 - Ilkley Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
120	Ilkley Portrait & Local Area Strategy	264	251	215	16	33

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Level of housing growth and site density • Development of Green Belt/greenfield sites • Local infrastructure/services • Flooding/surface water flood risk • Local road network • Ecology/habitats • Recreation and open space • Local character and landscape • Neighbourhood plan • Support for New homes • Impact on highways network • Other comments	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy IL1: Ilkley, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. General Issues • Plan fails to mention key environmental assets including riverside park, Denton road, the lido, Ben Rhydding sports field, Ben Rhydding gravel pits nature reserve
2. Level of housing growth, sites and density: • The Housing target is too high in relation to the size of the settlement, which will equate to a 5% increase in population. No evidence or justification for this. It will undermine character and infrastructure (schools, roads, health care facilities). • No need for additional homes which would likely be large expensive properties and older persons housing which would not meet local needs. It was not considered the new homes would be affordable or what percentage of new developments would be affordable. • The housing target does not consider past development that has been built in the town. Housing from the Ashlands site is not referenced • Development will be low density and there are many small plots available in the settlement • The demand for houses in Ilkley will exceed supply for the foreseeable future. All that happens is prices will continue to rise making it unaffordable for many. Suggest it would be better to concentrate on less affluent areas where economic benefits matter most.
3. Development on Green Belt/greenfield sites: • Object to significant amount of development on Green Belt. Will create urban sprawl, impact on openness, countryside encroachment and ribbon development along Coutances Way • Development to the east of the town will link Menston, Burley and Ilkley along lower Wharfedale • No exceptional circumstances have been demonstrated as there are sufficient brownfield sites in alternative areas and reasonable alternatives have not been considered. • Reference made to the judgement dated 8/6/2020 in Aireborough Neighbourhood Development Forum vs Leeds City Council, cited as relevant to the Bradford Local plan in relation to removing green belt sites and developing brownfield land instead. Reference also made to Government announcements on making development of brownfield land easier to protect green belt. • The Green belt is vital to the setting and character of Ilkley, which is a key part of its attraction. Particular reference was made to IL1/H and impact on the rural character of Ben Rhydding Drive and walking routes from the town to the moor.

- Development of homes on Green belt land will not meet local needs
- Brownfield land should be prioritised and greenfield sites protected. Industry should be moved out of the town centre and houses built on brown field sites.
- Building on green belt land is not consistent with the Council's declaration of a climate emergency

4. Local infrastructure/services:

- Impact of no. of homes proposed on insufficient local infrastructure (schools, roads, health, parking) with no plan to improve existing facilities
- Ilkley Grammar is oversubscribed; the Plan should keep options for school relocation open
- The combined sewage and drainage system is already overwhelmed and proposed new development will make matters worse and negatively impact water quality
- No employment proposed - the town needs jobs and not more housing.
- There is insufficient parking provision at Ilkley station and Ben Rhydding station.
- Rail services are already full at peak commuting time

5. Flooding/Surface water flood risk

- Impact of proposed development on River Wharfe and surface water. Increased flood risk to the A65 from run off from Ilkley Moor resulting from planned developments in Ben Rhydding.
- The plan needs to plan for climate change.

6. Local Road network

- Impact of traffic increase on the already busy Wheatley road which together with the loss of green belt land will negatively affect air quality
- Increased egress onto the A65 will increase levels of congestion particularly on the east side
- Problematic road access for sites around Ben Rhydding particularly on Wheatley Grove and the narrow, single lane section under the railway bridge. This is a dangerous junction where it meets Springs Lane and Valley Drive

7. Ecology/Habitats

- Impact of proposed levels of development on the South Pennine Moors SPA/SCA, and the North Pennine Moors SPA/SCA and River Wharfe which are sites of wildlife importance
- Impact of proposed development on protected biodiversity and wildlife, in particular loss of greenfield sites around the town

8. Recreation and open space

- Impact on footpaths, in particular the Dales Highway, the Dales Way

• Concern over the loss of greenspace and impact on local health
9. Local Character and landscape • Impact of proposed developments on the unique local character/conservation areas/landscape sensitive to change- in particular the rural nature of the town and impact on its status as a tourist destination. • Loss of open green setting of the town and impact on key view views to Ilkley Moor and the Cow and Calf Rocks.
10. Neighbourhood Plan • The structure should be aligned to the Ilkley Neighbourhood Development Plan to aid consistency/clarity
Support
1. New homes • New housing is needed to support growth/investment and the future sustainability of the town, subject to consideration of managing flood risks and additional required infrastructure (including schools, healthcare) • Support for affordable homes provision in the town • Support for the sites but general concern of low proposed densities • Support for the Area Strategy but concerns of high housing no.s and impact on greenbelt
2. Local infrastructure • Support for the objectives but consider the method is flawed in relation to flood management and building on greenspaces • Concern over commitment to improve parking provision- this should not mean “increase”. Alternative options should be explored such as electric bike and car sharing schemes • Strong support for the continued development/completion of the Wharfedale Greenway
Comments
1. Impact on Highway Network • Concern over the increase in traffic from tourists and commuters using the railway station where there is insufficient parking provision and pressure on other services including schools and health facilities through number of new homes, including provision of power and safe disposal of sewerage. Suggestion that no development should be allowed to start until a bypass is in place • The development of the number of homes proposed is not considered likely to have a severe impact on the capacity, operation of safety of the strategic road network but should be considered cumulatively alongside other sites within the plan
2. Other comments • Suggestion that other sites should be considered such as care homes which lie empty and could be converted

- Concern that windfalls have not been addressed and hence the needs of the community not fully assessed.
- Concern that development in Ilkley will be aimed at Leeds commuters and will accommodate the wrong type of homes
- Concern over the allocation of green belt sites, particularly the balance of green belt sites which amounts to 97% of all new homes proposed and consequential impacts- potential encroachment, ribbon development and impacts on landscape
- Concern that options for a new secondary school site have not been considered in full nor has the provision of a park and ride facility for the station
- The strategy should use/align the same structure and objectives as the Ilkley Neighbourhood Plan to ensure greater clarity between policy and delivery
- Comment that the proposed green ways route on the plan is incorrect and should be redrawn to run around the site and avoid the Ashlands Road development site
- Comment that the sites should incorporate green design to limit their impact on the environment and the strategy and allocation of sites should address the climate emergency through better insulation etc.
- The Council should consider if there are better alternatives to providing new homes in vacant properties and other brownfield sites in the District
- Representations relating to specific issues with the wording of the section

Representation IDs: 22, 31, 47, 53, 71, 74, 76, 121, 197, 202, 257, 349, 452, 458, 514, 539, 593, 642, 766, 844, 964, 1011, 1044, 1169, 1177, 1246, 1278, 1298, 1409, 1437, 1459, 1473, 1479, 1540, 1553, 1554, 1645, 1660, 1701, 1733, 1741, 1790, 1792, 1794, 1861, 1889, 1890, 1964, 1997, 2034, 2055, 2090, 2095, 2144, 2201, 2280, 2306, 2308, 2449, 2515, 2544, 2646, 2661, 2676, 2684, 2780, 2804, 2823, 2899, 2976, 2982, 3096, 3175, 3193, 3222, 3259, 3331, 3594, 3648, 3733, 3767, 3842, 3862, 3886, 3977, 4003, 4067, 4198, 4215, 4221, 4352, 4533, 4689, 4803, 4853, 5031, 5037, 5086, 5606, 5631, 5642, 5656, 5663, 5695, 5699, 5773, 5801, 5813, 5830, 5839, 5851, 5993, 5994, 6003, 6719, 7043, 7225, 7246, 7422, 8195, 8431, 8656, 8718, 8728, 8760, 8776, 8863, 9082, 9125, 9644, 9667, 9668, 9670, 9701, 9753, 9862, 9918, 9950, 9968, 10037, 10072, 10121, 10133, 10177, 10357, 10358, 10475, 10621, 10697, 10788, 10925, 10969, 10998, 11030, 11216, 11297, 11397, 11677, 11802, 11838, 11930, 12126, 12255, 12834, 13214, 13437, 13966, 14006, 14112, 14113, 15027, 15222, 15509, 15665, 15677, 16414, 16429, 16609, 16681, 16686, 16790, 16964, 16972, 16997, 17008, 17039, 17342, 17487, 17773, 17783, 18035, 18077, 18127, 18253, 18309, 18482, 18907, 19215, 19395, 19398, 19453, 19937, 19939, 19940, 19941, 20010, 20021, 20022, 20056, 20062, 20327, 21072, 21073, 21074, 21253, 21282, 21368, 21416, 21586, 21605, 21778, 21855, 23473, 23498, 23687, 23750, 23760, 23839, 24424, 24616, 24902, 24923, 25112, 25256, 25262, 25379, 25620, 25664, 26281, 26498, 26779, 27927, 27936, 28083, 28245, 28364, 28371, 28375, 28376, 28483, 28489, 28492, 29039, 29107, 29119, 29164, 29543, 29670, 29690, 29782, 29795, 29796, 29798, 29983

Sites

As highlighted above, 4 sites and were put forward in the Preferred Options document to meet the proposed development requirements for Ilkley (all for residential). Under Q121 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **2086** representations were received in relation to the Ilkley site allocations from **2050** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents, landowners, organisations and Parish/Town Council. Table **86.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in Table **86.4**.

Table 86.3: Ilkley Proposed Sites (IL1/H to IL4/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
IL1/H – Ben Rhydding Drive, Wheatley Grove	752	736	712	11	29
IL2/H – Skipton Road East	325	323	240	57	28
IL3/H – Coutances Way	699	685	657	10	32
IL4/H – Stockheld Road	310	306	243	34	33
Totals	**2086**	**2050**	**1852**	**112**	**122**

Table 86.4 Error! No text of specified style in document.**: Ilkley Proposed Sites (IL1/H to IL4/H) - Summary of Representations Received**

IL1/H: Ben Rhydding Drive, Wheatley Grove

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
IL1/H – Ben Rhydding Drive, Wheatley Grove	752	736	712	11	29

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt/greenfield site • Wildlife, habitat and trees • Impact on local infrastructure/services • Proposed access point • Local road network • Impact on local character/heritage • Loss of recreational amenity • Impact on health • Housing allocation/density • Flood risk /surface water flooding • Other objections • General support • General comments	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H383 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:

1. Development on Green Belt/greenfield site

- No justification for development in the green belt. No exceptional circumstances
- The Council acknowledges the contribution of the site as major but others as ‘’moderate”- this is flawed. Green belt assessment refers to negative impact
- No change since the planning inspector’s decision on the 1998 UDP and contrary to the views of the secretary of state in 1972,1985,1988 that the site should be released from the green belt
- Development will narrow the gap to Burley (urban sprawl)
- Ilkley has at present a strong defensible green belt boundary defined by the urban edge- development would lead to a weaker edge and urban sprawl
- Green belt should only be used if there are no brownfield sites available
- 97% of the development in Ilkley is green belt whereas it is 20% elsewhere

- **Wildlife, habitat & Trees**
- Development will have a negative impact on wildlife/ nature conservation
- Site contains numerous TPOs and is a key habitat for insects, birds and other species
- Impact on trees and wildlife- The Council should be looking to re-wild the area around Coppy Wood rather than build on it
- Site is home to a wide variety of species including owls, curlew, skylarks, red kite bats and deer
- Construction traffic may impact on the root systems of trees with TPOs
- Site provides a wildlife corridor to the moors
- Site is close to the AONB and within the protected zone of the SPA- - development could impact on the birds on Ilkley Moor. This is a fragile ecosystem will not comply with Local Plan Policy EN2

2. Impact on local infrastructure/services:

- The sewage disposal systems are overloaded and raw sewage has in the past come up onto the surface in the proposed development site and Moorfield Road. Ilkley sewage works discharges into the River Wharfe every 3rd day- this will increase with this development
- The local transport infrastructure is poor. Morning commuter trains are already overcrowded and cannot be extended as the platform is too short
- Ilkley Grammar cannot be increased and primary school have limited places
- Parking in Ilkley is a nightmare at weekends

- Insufficient employment in Ilkley which will generate more commuters out

3. Proposed site access point:

- Limited access for the number of homes. Too many houses from one access point
- Wheatley Grove is steep and un-gritted in winter

4. Local road network

- Increased traffic, noise and pollution at an already busy junction
- No space to widen Ben Rhydding Drive and Wheatley Grove (railway bridge). The junction of Wheatley Grove to Wheatley Lane is dangerous due to traffic coming up Wheatley Lane not being visible to vehicles leaving Wheatley Grove and vice versa.
- No pavement on Ben Rhydding Drive- development will impact on safety
- Congestion already on A65 which is also often under water (the development of this site will create more surface water runoff)
- Construction vehicles will be unable to negotiate bends in High Wheatley nor the railway bridge so all traffic will have to come through Ilkley town centre
- The iron bridge across the river is single carriageway and impossible to cross

5. Impact on Local Character/heritage

- The loss of the site and the development of so many new houses in a concentrated area would have a significant detrimental impact on the existing character of Ben Rhydding.
- Loss of semi-rural traditional pasture with ancient trees- sensitive landscape
- New build properties in this part of Ben Rhydding do not match the local character. Development would undermine the conservation area
- Roman Road runs directly across the site (Tadcaster to Ilkley) - important heritage could be lost
- Loss of historic and landscape character area/area of high visual amenity
- Loss of views from the centre of the site in all directions
- Dense development would be inconsistent with the area- 130 houses not inappropriate in this area
- Packhorse bridge is a site of historic importance
- Gibb Farmhouse is 230m from the edge of the site. The development of the site could harm the heritage elements of the buildings- therefore an assessment will need to be undertaken to determine the impact of the development and provide mitigation if necessary

6. Loss of recreational amenity

- The public right of way is key to the recreational amenity of the area

7. Impact on health

- Loss of green space crucial to mental wellbeing
- Concern for safety if site developed for person with sight disability using Ben Rhydding Drive

8. Housing allocation/density

- The Councils Site assessment is flawed- the site cannot be developed sustainably without impacts on environment and existing services. It has not accurately been assessed in the sustainability appraisal. Other sites have been rejected for “Green Belt, Landscape, Access or Flooding”- this site has all of these attributes
- No part of the site is within 800m walking distance to Ben Rhydding station
- Development would create a negative impact on sustainability with people having more than 1 car and need to drive as services locally are limited
- View of the farm will be lost
- Site has limited access to local services- not sustainable. Council have not provided an infrastructure statement nor an access statement
- The development will move Ilkley toward being part of the ribbon of commuter suburbs to Leeds. Development would create a continuous corridor of development in Wharfedale
- No affordable housing suggested. The site will not satisfy the affordable housing requirement in Bradford as the lands value will be too high and prohibit the provision of affordable housing. Site will not meet the housing needs of those covered in paragraphs 59,61,68 and 70
- Development of the site should respect the character of the area which is mid/high price housing which is not in short supply- would need to be a bias to expensive housing to subsidise low cost housing
- The site is north facing and benefits from very little sun. Access is uphill and is not easy to reach on foot
- Parts of the site will require “terracing” which will add to environmental damage
- Noise and smells from development
- Proposed density is almost half of the minimum required under Policy HO2 and should be 251.
- The allocation of this site is a failure to encourage economic development in Bradford and Keighley
- Loss of best and most versatile agricultural land

- Development should wait until the impact of the development at Burley is known
- Development would mean no land for the park and ride and new school
- The release of this site will put significant pressure on the eastern side of town- 90% of housing proposals are in this part of Ilkley
- If houses are built they should be limited in number and be of exceptional design as per green belt exception not Barratt Homes or a Georgian re-creation.
- Loss of sledging site

9. Flooding/Surface water

- Site is steeply sloping with springs leading to wet areas - standing water is an issue
- Flood zones 2 and 3 and small part of draft 3b in the site boundary. Post development discharge rates should be restricted to the pre development rate. Mitigation will be required including raised floor levels and area for compensatory storage
- Site holds water in the winter- its development will increase flood risk downstream

10. Other

- Infill development has taken place in recent years which has not been included in the Plan
- Other designated sites have less of an impact than IL1/H
- More homes will make Ilkley undesirable and adversely affect the quality of life for existing residents. Housing requirement in the plan has been overstated. No rationale as to why houses are needed in this location when demand is for affordable homes close to jobs
- There are other brownfield options in Bradford- only a low percentage are currently allocated. Brownfield sites of less than 0.25ha should be exhausted first not just the ones on the register. WYCA funding available to support brownfield development should be used
- The Council has more than a planning interest as the owner of the site. Bradford Council putting financial reward ahead of quality of life for existing residents- Ilkley is a cash cow for Council tax. Will residents see any benefit from the sale of the site?
- Impact on tourism- site provides good view of the Cow and Calf rock
- The Council have not looked at other options nor fully examined or justified that all other reasonable options have been considered. The Councils current housing targets can be met with infill development. There are at least 10 plots in Ilkley where 20 or more homes could be built without building on green belt and locations where 5-10 could be built. Building at a greater density in the urban area would encounter less opposition.

- The old hospital site north of the river should be developed instead (Harrogate District)
- An increase in the population will increase anti-social behaviour in the town
- Finding a new site for Ilkley Grammar should be prioritised then homes can be built on existing site
- No account taken of the pandemic and resulting unused office buildings
- Landlords should be provided with financial incentives to convert vacant commercial units to homes- The pandemic has freed up a large amount of office space
- Development would be inconsistent with the Paris agreement on 2050 net zero targets
- The development will devalue existing properties in the area
- Impact on the peace and quiet at the retirement village
- Local broadband is overstretched with people working from home- the development of this site will make matters worse

Support:

- The development would not impinge on the approach into Ilkley and will have limited visual impact or extend the boundary of the town as existing housing is already in place. Sensible place for new homes in a pleasant area
- Fulfils a local need and will be beneficial for the age and social mix of the area- particularly social housing
- The allocation of the site is justified and appropriate and will not harm the purposes of the wider green belt
- There are no technical constraints to prevent the site being delivered. It can be developed for 130 homes whilst providing open space and protection the footpath with tree planting and ecology enhancements
- The site is well placed with good access to shops and station.
- Development will support the local primary school which has low numbers
- Site is in a sustainable location and not in the flood zone

Comments:

- There should be no affordable homes. Development should be similar to what is there now- individual high quality homes
- Site should be mixed and include bungalows and flats with balconies/terraces and quality design
- Development should be built at 50 units to the hectare, with limited parking to ensure people use public transport and not be wasted on low density executive development. 20/100 homes would be more acceptable/appropriate

- Could the site be divided into plots for self-build- to allow custom build? This would avoid the identikit development of standard estate homes.
- Need for homes for people on average incomes in the town. Provisional support if infrastructure and affordable homes are prioritised.
- Site should only be developed with compensatory improvement to schools and infrastructure, including post office. Development should be phased over 10 years so as not to overload the area
- Flood zones 2 and 3 and small part of draft 3b in the site boundary. Post development discharge rates should be restricted to the pre development rate. Mitigation will be required including raised floor levels and area for compensatory storage. Consideration should be given to making space for water and manage flood risk where possible
- Wharfedale greenway which passes through the site should not be compromised. Pedestrian and cycle access should be made available from Ben Rhydding Drive
- Potential impact on the functionality of the land linked to the SPA- Sites should be screened against the WY Ecology Service SPA Bird survey methodology to determine the presence/sensitivity of the site for Golden Plover.
- The site may be on best and most versatile agricultural land and the long term capability of such land should be safeguarded
- Highway improvements will be needed where Wheatley Lane meets Bolling Road and reduce congestion. New bridge carrying the railway line should be provided to improve access
- It is a myth that providing housing on green belt sites will help provide jobs and minimise travel
- Site should be used as a community garden
- Leisure facilities in the town are not fit for purpose
- Development could impact on the stability of railway line
- The evaluations in the document seem to underplay the concerns mentioned in the proforma
- Extra car parking should be mandatory if developed particularly for commuters using train station
- What plans are in place to compensate for the loss of open space and trees?

Representation IDs: 54, 61, 64, 75, 100, 115, 120, 123, 129, 136, 414, 449, 517, 542, 549, 561, 595, 625, 640, 664, 763, 816, 831, 845, 952, 965, 970, 988, 1035, 1105, 1115, 1124, 1127, 1146, 1153, 1168, 1172, 1175, 1179, 1210, 1265, 1280, 1289, 1295, 1299, 1303, 1388, 1408, 1410, 1430, 1442, 1474, 1495, 1507, 1508, 1526, 1530, 1536, 1556, 1570, 1576, 1584, 1591, 1640, 1644, 1655, 1658, 1659, 1672, 1677, 1702, 1708, 1724, 1740, 1746, 1747, 1751, 1769, 1789, 1799, 1800, 1801, 1811, 1823, 1856, 1858, 1876, 1884, 1934, 1941, 1999, 2006, 2014, 2063, 2070, 2094, 2096, 2111, 2147, 2172, 2202, 2204, 2206, 2222, 2226, 2263, 2317, 2338, 2350, 2380, 2381, 2432, 2436, 2441, 2450, 2488, 2489, 2522, 2550, 2581, 2663, 2670, 2685, 2693, 2710, 2777, 2840, 2849, 2859, 2875, 2882, 2891, 2902, 2906, 2914, 2950,

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4072, 4105, 4112, 4149, 4177, 4199, 4206, 4209, 4210, 4239, 4318, 4392, 4449, 4456, 4467, 4469, 4472, 4501, 4535, 4807, 4814, 4930,
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8823, 8903, 8945, 8955, 8989, 8990, 9000, 9045, 9064, 9069, 9080, 9081, 9083, 9202, 9233, 9468, 9520, 9530, 9625, 9641, 9645, 9754,
9951, 9966, 10005, 10009, 10047, 10062, 10070, 10076, 10131, 10143, 10189, 10195, 10239, 10241, 10246, 10355, 10371, 10474, 10476,
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15698, 15816, 16040, 16125, 16299, 16344, 16415, 16526, 16544, 16567, 16598, 16613, 16615, 16618, 16687, 16791, 16965, 16973, 16992,
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21591, 21608, 21638, 21640, 21763, 21783, 21851, 22051, 22384, 22461, 22767, 23454, 23471, 23508, 23638, 23664, 23688, 23761, 23765,
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24881, 24899, 25257, 25260, 25272, 25300, 25305, 25317, 25340, 25418, 25452, 25543, 25545, 25547, 25551, 25607, 25624, 25626, 25660,
25684, 26311, 26385, 26445, 26466, 26606, 26620, 26628, 26703, 26745, 26747, 26781, 26782, 26998, 27088, 27257, 27481, 27501, 27525,
27527, 27553, 27783, 27861, 27928, 27934, 27987, 28078, 28082, 28150, 28167, 28177, 28212, 28241, 28308, 28314, 28315, 28319, 28365,
28366, 28374, 28377, 28395, 28397, 28401, 28407, 28435, 28490, 28516, 28518, 28561, 28565, 28603, 28612, 29040, 29122, 29264, 29335,
29384, 29421, 29509, 29511, 29532, 29551, 29672, 29685, 29778, 29783, 29799, 29985, 30065, 30122, 30190, 30191

IL2/H – Skipton Road East

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
IL2/H – Skipton Road East	325	323	240	57	28

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • .Development on Green Belt/greenfield site • Wildlife and trees • Impact on local infrastructure/services • Proposed access point • Local road network • Impact on local character/heritage • Loss of recreational amenity • Impact on health • Housing allocation/density • Flood risk /surface water flooding • Other objections • General support • General comments	This site is under construction and is identified as H384 in the Regulation 19 Local Plan.

Summary of Representations
Objections:

1. **Impact on local infrastructure/services:**
   - Detrimental impact/pressure on services such as medical services, parking and public transport- Morning commuter trains are already overcrowded and cannot be extended as the platform is too short. Supermarkets are small with inadequate parking- development will increase demand
   - School places limited - Ilkley Grammar cannot be increased
   - The combined sewage system is already overwhelmed. It discharges into the River Wharfe every 3rd day – the development of these houses will lead to further degradation in water quality

2. **Proposed site access point:**
   - Access on to Skipton Rd will be dangerous- has a traffic assessment been undertaken?

3. **Local road network**
   - Skipton Road is congested with tailbacks at peak times – development will add to congestion
   - Increased traffic, noise and pollution and parking pressures in town centre

4. **Impact on Local Character/heritage**
   - Detrimental impact on the environment and areas of historic importance- conservation area
   - The development will damage the character of the town as a “tourist draw” and impact on adjacent landscape. Detrimental impact on the community and Ilkleys uniqueness
   - Site is adjacent to grade 2 listed building and the development could adversely alter the sensitive heritage – before allocating the site an assessment should be undertaken of the contribution of the assets of the listed building and whether any mitigation will be required or if there are benefits that outweigh the harm
   - Development will affect the view if the Nidderdale AONB. Loss of panoramic views.
   - Area is highly visible and pleasant to the eye

5. **Trees and Wildlife**
   - Loss of habitat and impact on birds and other wildlife
   - Impact on trees
   - Site is within 2.5km of the SPA

6. **Loss of recreational amenity**
   - Loss of recreational amenity resource

7. Impact on health

- Loss of green space crucial to mental wellbeing

8. Housing allocation/density

- Site is steep and not suitable
- Site likely to be have been chemically sprayed to keep down vegetation
- The site cannot accommodate 20 homes
- Site is not necessary- all of Ilkleys target can be accommodated on IL3/H if density is increased
- The houses will not be the right type- there will be no affordable housing
- The Councils Site assessment underplays/disregards the constraints mentioned. Does not meet the criteria for sustainable development
- The site density is too low at 17dpha and does not meet the minimum 35dpha as set out by Policy HO2
- Distance from town centre will necessitate car use
- Development would obliterate any hope of opening the rail route to Addingham - route should be preserved for possible light rail and allow a cycle path to be built
- Site should be re-wilded or planted with trees not developed
- The proposal is against the Local Plans aim to protect the environment
- Development will create pressure for further ribbon development

9. Impact on Green Belt/greenfield site

- Proposal is contrary to case law “it is not arguable that the mere process of preparing a new local Plan could in itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary” (Gallagher Homes Ltd v Solihull MBC)
- Detrimental impact on green belt- there are no special circumstances to allow this be developed. Council have not demonstrated that Ilkley’s housing needs warrant releasing green belt
- Loss of green belt will erode the towns charm and create pressure for further development. Development will contribute to urban sprawl and negatively impact on the landscape character of the area
- Green belt acts as a natural flood defence – the development of the site contravenes Policy SC1, point 9
- Permanent loss of greenspace- damaging the environment

10. Flooding/Surface water

- Site is at high risk of flooding

11. Other

- No acknowledgement of recent development of 30 infill plots per year - Infill development has taken place in recent years which has not been included in the Plan
- Focus should be on affordable homes in brownfield locations in Keighley and Bradford
- Concern for children walking home from school over traffic increases
- Potential land instability
- Brownfield sites available in other locations. No account taken of the pandemic and resulting unused office buildings
- 97% if the development in Ilkley is green belt – brownfield sites should be used first
- Development will de value existing homes
- Development of carbon intensive activities is hypocritical in light of Bradford Councils climate emergency
- Bradford Council putting financial reward ahead of quality of life for existing residents- Ilkley is a cash cow for Council tax

Support:

- Site is an eyesore- best to develop but owners should not be rewarded for neglecting site. Brownfield site which supports no wildlife.
- A small well designed and sensitive development could enhance the gateway into Ilkley - The number of homes proposed is sustainable
- Development provides the opportunity to contribute toward the Wharfedale Greenway
- Site suitable for affordable housing
- Site suitable for low level stone “farm” style homes not affordable housing
- Trees with TPOS should be respected and site should be sensitively designed
- Reasonable site with potential to further increase to the north
- Housing targets set by central Government mean Bradford Council have to identify the most sustainable sites
- Development would be inconsistent with the Paris agreement and 2050 net zero targets
- Proposal is acceptable providing it conforms to the requirements of the Ilkley Sustainability Plan

Comments:

- The development of this site could create flooding to the houses below and the tennis club
- Development should be aimed at the lower end of the market – starter homes

- Development should be to the highest environmental standards and design
- Site is in keeping with the “lay of the town”
- The railway embankment should be reserved for the greenway route to Addingham
- There should be a 30% reduction in surface water run discharge as part of the development and no increase post development. Consideration should also be given to providing betterment in flood risk management
- Cycle lanes should be created on either side of the road with a crossing point
- Building homes without improving local infrastructure is not building communities
- Allocation may result in the loss of function land for SPA birds. West Yorkshire Ecology Service methodology should be followed to determine if any impact on Golden Plover. If exists mitigation requirements will needed.

Representation IDs: 73, 116, 416, 543, 551, 596, 647, 762, 832, 846, 966, 1154, 1300, 1301, 1431, 1439, 1475, 1490, 1541, 1557, 1573, 1592, 1646, 1678, 1697, 1705, 1728, 1745, 1753, 1795, 1803, 1806, 1835, 1969, 2011, 2071, 2076, 2097, 2225, 2227, 2283, 2286, 2318, 2373, 2452, 2525, 2553, 2557, 2664, 2842, 2850, 2860, 2862, 2892, 2894, 2910, 2963, 2965, 2990, 3040, 3097, 3114, 3195, 3233, 3405, 3482, 3645, 3770, 3792, 3793, 3848, 3993, 4008, 4222, 4223, 4250, 4317, 4477, 4509, 4523, 4606, 4987, 5006, 5311, 5332, 5612, 5650, 5651, 5679, 5771, 5783, 5820, 5852, 5855, 5878, 5890, 5903, 6000, 6009, 6013, 6032, 6041, 6054, 6058, 6061, 6085, 6094, 6098, 6108, 6119, 6124, 6128, 6132, 6136, 6145, 6153, 6157, 6168, 6174, 6350, 6697, 6703, 6705, 6740, 6756, 6817, 6854, 7054, 7218, 7222, 7396, 7424, 7965, 8071, 8127, 8179, 8187, 8190, 8199, 8426, 8657, 8671, 8797, 8905, 8956, 9001, 9066, 9203, 9521, 9626, 9642, 9952, 10010, 10063, 10298, 10343, 10372, 10505, 10519, 10567, 10926, 10974, 10983, 11032, 11349, 11387, 11505, 11540, 11592, 11607, 11620, 11627, 11651, 11703, 11732, 11774, 11804, 11810, 11840, 11907, 11998, 12093, 12098, 12287, 12320, 12348, 12525, 12543, 12547, 12663, 12808, 12818, 12838, 12902, 12908, 13398, 13506, 13847, 13906, 13969, 13990, 14077, 14081, 14115, 14378, 15321, 15474, 15613, 15817, 16041, 16126, 16416, 16527, 16599, 16602, 16792, 16974, 16993, 17072, 17139, 17142, 17453, 17468, 17560, 17986, 18017, 18070, 18129, 18256, 18270, 18341, 18485, 18547, 18710, 18767, 18773, 18777, 18861, 18908, 18911, 19396, 19531, 19605, 19622, 19626, 19755, 19886, 20025, 20059, 20073, 20082, 20092, 20177, 20334, 20367, 20384, 20388, 20394, 20767, 20999, 21011, 21065, 21066, 21097, 21101, 21284, 21370, 21381, 21404, 21408, 21421, 21481, 21487, 21588, 21852, 22462, 23455, 23766, 23861, 23990, 24045, 24144, 24485, 24535, 24677, 24878, 24882, 25258, 25273, 25301, 25306, 25549, 25552, 25621, 25661, 25685, 26312, 26386, 26629, 26704, 27528, 27550, 27785, 28079, 28178, 28242, 28367, 28370, 28378, 28398, 28402, 28408, 28484, 28613, 29041, 29124, 29265, 29422, 29533, 29552, 29675, 29686, 29785, 29800, 29986

IL3/H: Coutances Way

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
IL3/H – Coutances Way	699	685	657	10	32

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt/greenfield site • Wildlife, ecology and trees • Impact on local infrastructure/services • Proposed access point • Local road network • Impact on local character/heritage • Loss of recreational amenity • Impact on health • Housing allocation/density • Flood risk /surface water flooding • General support • General comments	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H385 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Impact on local infrastructure/services: • Limited primary school places. Ilkley Grammar already has a limited catchment, is overcrowded and children from other villages struggle to get places now. Likely increase in children having to be bussed elsewhere

- Train network is poor- limited carriages on the trains and congested. Further pressure from additional residents will mean people resort to using private cars
- Parking in Ilkley is already a problem- development will worsen this and adversely affect the life of exiting residents
- Insufficient services such as doctors and dentists

2. Site access

- No access plan has been provided
- Access should be taken directly from A65 not Wheatley Lane. Potential hazard if more vehicles exit onto Wheatley Lane

3. Impact on the local highway network:

- Increase in traffic congestion and air pollution – risk to emergency services
- Bolling Road unable to absorb additional cars
- Potential for traffic build up on A65, Iron Bridge and Wheatley Lane partly a result of the garden centre
- Development will make the junction with Valley Drive unsafe, particularly to pedestrians
- No traffic assessment of the area has been undertaken
- Ilkley needs a bypass before any new homes are built

4. Impact on local character and heritage

- Impact on character- development will disfigure the character/landscape of the area and deter tourists
- Site adjoins grade 2 listed building and development will have an impact on the asset

5. Ecology, Habitat & Trees

- Loss to wildlife habitats and ecology- rare species use the fields near Ben Rhydding treatment works- development will disturb habitat (curlew)
- Loss of trees and hedgerows
- Population of barn owls not far from the site

6. Flood risk/water quality

- Building on flood plain
- Culverts run under properties on Wheatley Lane- building on the field will risk flooding- site has not been properly assessed
- Site currently provides natural storage for run off
- Yorkshire Water currently already discharge sewage in the River Wharfe as the facility cannot cope. Potential for increases in pollution to the river

7. Impact on Recreation

- Loss of amenity – footpaths will be lost

8. Development of greenfield/Green Belt land:

- No exceptional circumstances to justify the changing of green belt boundaries – loss of openness, encroachment, narrowing the gap and urban sprawl
- There are no special circumstances that mean that development should be allowed
- The open area on approach to Ilkley means the moor above can be appreciated, if developed it will detract from the beauty of the area
- Current green belt boundary is defensible – the new eastern and northern boundaries will not be defensible and will allow future sprawl into adjoining land - Potential merging of Ilkley with Burley in Wharfedale and loss of identity
- Green belt paper reports that the development of the site would have a major impact
- 5 year housing supply elsewhere, so no justification in releasing green belt
- Area is highly valued for its green appearance

9. Housing Allocation/Density

- Gross overdevelopment- density would be inconsistent with the existing residential area
- New school needed not 150 houses - Site should be used as parking for railway station - Site should be used for tree planting
- Inclusion of car park will attract anti-social behaviour
- Fields capture carbon and support agriculture
- Too many homes- disproportionate to the size of the town. A smaller development of 40 more preferable
- Site is poorly served by public transport
- The houses will be developer boxes with no individuality
- Development will blur the sharp distinction between town and countryside and lead to further development eastwards
- Housing unlikely to be affordable - Constraints will prevent the delivery of affordable housing.
- Affordable houses needed and would be acceptable – no need for large houses
- Development will be right up to boundary with scout hut where there are regular events on evenings- potential for disputes with new residents and child safeguarding issues
- Housing development here contradicts strategic policies- Sustainability Appraisal score suggests the site should not be allocated
- The proposed area is far enough away from the train station, schools, shops and amenities to ensure that residents will rely on private vehicle use

- Proposal is more about raising revenue than a sustainable plan

10. Impact on health

- Green space helps mental health and must be preserved

11. Other

- Other brownfield options are available including in Bradford City Centre, including in offices that will no longer be needed post pandemic - Thousands of empty properties in the District that need to be reused
- No evidence that brownfield sites have been prioritised in the Plan- NPPF says brownfield sites should be prioritised
- Development will devalue other properties
- Loss of views
- Environmental Impact- Development would be inconsistent with the Paris agreement on 2050 net zero targets
- No acknowledgement of recent development of 30 infill plots per year - Infill development has taken place in recent years which has not been included in the Plan - unfair weighting on Ilkley
- Potential instability of railway embankment
- Impact on tourism
- Site provides a view of the Cow and Calf rocks
- Ben Rhydding has been targeted to provide a large proportion of the housing target
- Enough people in Ilkley already- development here is unnecessary
- Development here has already been refused on this site in the past
- Site is the only option for a new Ilkley Grammar which would free up the old site for redevelopment
- Will not contribute toward employment
- Failure to encourage economic development in Bradford and Keighley, hence Ilkley is now a commuter town for Leeds

Support:

- Development will fulfil a need – Ilkley needs new housing for first time buyers, key workers, young families and downsizers
- The site offers no direct amenity access to the public
- Assessment accurately summarises the issues- a SUDs scheme will be critical
- Support as an alternative to IL1/H- site is close to services and not in the flood zone
- Site should be imaginatively developed- self build rather than by a mainstream developer to allow innovation of styles and house types

- Site is well located to transport, community and leisure and countryside but new infrastructure is also needed
- Site has the ability to support all Ilkleys housing allocation if density is increased to 50 homes per hectare and will enable more affordable housing to be provided
- Good plan if traffic management is not an issue
- Site should be properly sustainable and provide allotments and other open spaces including wet area for wildlife

Comments:

- If development goes ahead it would be good to have pedestrian access to Ben Rhydding Nature reserve through the site
- Sites impact could be mitigated by reducing the size of the site and number of homes to 140 and adding planting
- Council owned site which the Council must ensure is developed in an appropriate and sensitive manner. Promises on mitigation need to be kept
- What proportion of the homes will be affordable and will they be onsite?
- The development should conform to the Ilkley Sustainability Plan
- New bridge for railway line will be needed
- The wet area should be developed into a wetland nature reserve to complement the ne at the opposite side of the A65 and the development site screened from the A65 by a shelter belt

Representation IDs: 48, 51, 58, 59, 72, 102, 104, 105, 119, 125, 239, 304, 391, 404, 417, 532, 544, 550, 574, 601, 645, 759, 833, 847, 968, 976, 990, 1106, 1116, 1147, 1156, 1173, 1180, 1211, 1266, 1279, 1290, 1302, 1307, 1387, 1407, 1412, 1434, 1440, 1454, 1457, 1460, 1470, 1510, 1511, 1527, 1532, 1538, 1558, 1571, 1574, 1593, 1647, 1656, 1657, 1661, 1675, 1676, 1686, 1698, 1706, 1726, 1727, 1742, 1768, 1791, 1804, 1808, 1818, 1820, 1833, 1885, 1939, 1967, 2001, 2013, 2041, 2047, 2064, 2072, 2098, 2103, 2105, 2106, 2112, 2148, 2175, 2203, 2207, 2209, 2237, 2257, 2278, 2281, 2321, 2339, 2351, 2372, 2382, 2426, 2434, 2435, 2454, 2456, 2492, 2498, 2530, 2552, 2665, 2680, 2692, 2707, 2843, 2851, 2861, 2883, 2893, 2911, 2935, 2940, 2961, 2995, 3012, 3022, 3043, 3099, 3108, 3111, 3117, 3213, 3428, 3434, 3467, 3484, 3520, 3609, 3638, 3646, 3749, 3757, 3797, 3817, 3849, 3923, 3933, 3934, 4004, 4009, 4062, 4106, 4119, 4152, 4166, 4180, 4188, 4212, 4219, 4225, 4271, 4323, 4401, 4430, 4463, 4473, 4487, 4506, 4612, 4738, 4781, 4806, 4835, 4937, 4942, 4974, 5002, 5004, 5009, 5044, 5048, 5078, 5100, 5114, 5118, 5156, 5312, 5330, 5337, 5370, 5379, 5387, 5605, 5613, 5652, 5661, 5704, 5740, 5749, 5761, 5770, 5788, 5809, 5812, 5821, 5850, 5859, 5871, 5883, 5891, 5899, 5905, 6001, 6006, 6010, 6014, 6016, 6019, 6024, 6033, 6042, 6055, 6059, 6062, 6070, 6076, 6078, 6086, 6091, 6095, 6099, 6107, 6115, 6117, 6120, 6125, 6129, 6133, 6137, 6140, 6147, 6154, 6158, 6169, 6178, 6285, 6352, 6431, 6587, 6685, 6698, 6704, 6707, 6741, 6758, 6798, 6818, 6856, 6885, 6896, 7048, 7083, 7213, 7219, 7223, 7227, 7319, 7397, 7425, 7437, 7871, 7909, 7966, 8072, 8100, 8118, 8128, 8180, 8188, 8191, 8196, 8200, 8403, 8416, 8427, 8430, 8489,

8658, 8669, 8689, 8758, 8782, 8795, 8798, 8824, 8904, 8957, 8979, 9002, 9065, 9067, 9070, 9084, 9204, 9234, 9469, 9522, 9531, 9627,
9643, 9647, 9755, 9863, 9953, 9967, 10011, 10048, 10064, 10067, 10120, 10144, 10157, 10176, 10196, 10228, 10240, 10242, 10245, 10247,
10356, 10373, 10392, 10473, 10486, 10506, 10520, 10547, 10568, 10616, 10644, 10701, 10703, 10724, 10758, 10827, 10929, 10932, 10941,
10975, 10981, 11033, 11217, 11250, 11260, 11284, 11350, 11395, 11412, 11466, 11494, 11506, 11509, 11520, 11541, 11572, 11593, 11608,
11621, 11628, 11639, 11652, 11691, 11704, 11742, 11775, 11799, 11805, 11811, 11841, 11908, 11933, 11937, 11978, 11987, 11999, 12011,
12023, 12043, 12094, 12099, 12128, 12200, 12276, 12288, 12321, 12335, 12346, 12349, 12451, 12462, 12465, 12526, 12545, 12661, 12811,
12819, 12823, 12839, 12897, 12900, 12905, 12911, 12912, 13113, 13114, 13378, 13399, 13472, 13491, 13504, 13507, 13713, 13848, 13870,
13907, 13992, 14030, 14078, 14082, 14116, 14317, 14377, 14929, 14939, 14941, 15310, 15322, 15475, 15614, 15661, 15667, 15669, 15675,
15679, 15699, 15795, 15819, 16042, 16127, 16206, 16345, 16417, 16528, 16545, 16577, 16600, 16614, 16619, 16682, 16829, 16975, 16994,
17073, 17097, 17102, 17138, 17143, 17286, 17329, 17340, 17457, 17469, 17491, 17561, 17772, 17987, 18019, 18033, 18071, 18076, 18130,
18218, 18257, 18271, 18289, 18339, 18486, 18494, 18551, 18708, 18711, 18742, 18761, 18763, 18765, 18769, 18774, 18778, 18784, 18862,
18865, 18867, 18897, 18906, 18912, 18958, 19181, 19185, 19218, 19246, 19530, 19604, 19608, 19617, 19619, 19623, 19627, 19756, 19796,
19798, 19818, 19887, 19908, 20007, 20009, 20012, 20020, 20024, 20058, 20063, 20074, 20084, 20093, 20155, 20157, 20160, 20174, 20175,
20178, 20329, 20335, 20364, 20368, 20371, 20382, 20385, 20389, 20395, 20768, 21000, 21061, 21067, 21068, 21085, 21098, 21102, 21255,
21285, 21371, 21382, 21394, 21396, 21398, 21400, 21405, 21409, 21418, 21419, 21422, 21482, 21488, 21490, 21494, 21584, 21589, 21592,
21609, 21639, 21784, 21853, 22053, 22385, 22463, 22768, 23456, 23472, 23509, 23639, 23666, 23689, 23762, 23767, 23780, 23793, 23815,
23841, 23862, 23867, 23872, 23991, 24046, 24145, 24225, 24235, 24486, 24536, 24617, 24678, 24688, 24690, 24879, 24883, 24900, 24903,
25259, 25261, 25274, 25302, 25307, 25318, 25341, 25421, 25453, 25546, 25548, 25553, 25608, 25623, 25627, 25662, 25686, 26313, 26387,
26446, 26467, 26607, 26610, 26621, 26630, 26705, 26746, 26748, 26999, 27089, 27258, 27482, 27502, 27526, 27529, 27554, 27784, 27862,
27929, 27935, 27988, 28080, 28084, 28168, 28179, 28213, 28243, 28309, 28316, 28320, 28368, 28372, 28379, 28396, 28399, 28403, 28409,
28436, 28437, 28487, 28491, 28517, 28519, 28562, 28567, 28604, 28614, 29042, 29123, 29266, 29386, 29423, 29510, 29512, 29534, 29553,
29674, 29687, 29787, 29801, 29987, 30066

IL4/H: Stockeld Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
IL4/H – Stockheld Road	310	306	243	34	33

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of greenfield site • Ecology, wildlife and trees • Impact on local infrastructure/services • Local highway network • Impact on local character/heritage • Impact on health • Housing allocation/density • Flood risk /surface water flooding • General support • General comments	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H386 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Impact on local infrastructure: • Impact of development on local infrastructure including primary/secondary school capacity, medical services and parking • Ilkley Grammar School cannot be expanded further • Rail system is already running at capacity with no potential to expand • Pressure on sewerage works which are already at capacity and overflow when there is a storm surge
2. Housing Allocation/density • 9 houses is too many for the site • Unacceptable that only 9 are proposed. The site should deliver apartments at higher density

- Site would be too expensive to develop and there will be no affordable housing provided
- Community orchard, formal garden, memorial site or parking would be preferable
- Site is poorly served by public transport

3. Flood risk/water quality

- Land is flood plain. Increased flood risk to existing homes if developed – some already have pumps in place.
- The road between the site and river frequently floods. The site acts as a permeable area to slow rainwater and reduce flooding

4. Impact on the local highway network:

- Access onto Skipton Road is on a sharp bend
- Road network is already congested

5. Impact on local character and heritage

- Site lies within the conservation and scheduled monument. The development of the site could harm elements of these assets. Assessment needed of the contribution which the site makes to those elements and if there is harm then measures should be taken or the site removed form the plan
- Loss of views to the river and park from Middleton Road, Stockheld Way and Bridge Lane
- Victorian properties around. New houses will have a negative visual impact
- Site is essential to local character- development will impact on scenic setting
- Site is too close to the church
- Site will require a heritage impact assessment

6. Ecology/Wildlife

- Site in buffer zone for SSSI
- Site falls with 2.5km of the Nidderdale AONB and Ilkley Moor which are protected from development- impact on wildlife if the site is developed
- Development will damage ecology- even as a small site wildlife will be lost
- Site lies in proximity to the South Pennine Moors SPA and has the potential to lead to loss of functionally inked land for SPA birds. Where functionality cannot be ruled out – mitigation requirements will be necessary

7. Development of greenfield site

- No specific circumstances that mean development should be allowed on green belt- other brownfield sites available including derelict mill buildings in Bradford

8. Other

- Development will exacerbate parking problems in the area – even though permits are in place
- Impact on house prices/values. Site boundary should not include the church car park. Without the car park, does the site fall below 0.20ha?
- There is no “h” in Stockeld Road
- Proposal does not take into account recent development and others planned
- Development needs of Ilkley should be re-examined to produce more compact development/increased densities to improve walkability
- Environmental impact study has not been undertaken
- More traffic will pose a risk to children being collected from All Saints School nearby
- Cumulative impact on town from planned development and that in neighbouring Burley
- Middleton Hospital site has not been considered by the Local Plan
- The Plan does not benefit Ilkley residents- town is already over developed
- Increase of air and noise pollution
- Proposal does not accord with the Ilkley neighbourhood plan

Support:

- Good use of unused open land- provides no amenity value
- The site should be developed in a sensitive way- development would need to be of high quality and reflect adjacent homes
- Site is a short distance from the town centre, has excellent access to the park and river
- Site is in a sustainable location close to town centre services, and public transport.
- Site can provide a site for both affordable and market housing within 5 years
- Site is not green belt, does not have high environmental value and is unused

Comments:

- Site is valuable space for church
- Site is very close to the river and any homes built here could be flooded - Lower part of the site floods
- Flood zones 2 and draft 3b within the site boundary/ There should be no development within 3b. Water discharge rates should be restricted to pre development levels and floor levels should be set above ground level and consideration should be given to making space for water in the development
- New homes should be aimed at the lower end of the market (starter homes)

- Site is very steep
- Site lies close to the route of the roman road/ford and may require archaeological excavation before development – design brief may be required
- Site could be developed to be in keeping with the lay of the town
- Development should only take place with equivalent improvements in local services, parking and green transport links
- Acceptable providing that it conforms to the requirements of the Ilkley Sustainability Plan
- NPPF favours the use of brownfield sites- use these first
- Development will act as an overspill area for commuters to Leeds

Representation IDs: 18, 106, 164, 188, 272, 418, 419, 545, 597, 602, 646, 765, 788, 834, 848, 969, 1155, 1304, 1309, 1441, 1476, 1529, 1545, 1559, 1575, 1594, 1648, 1663, 1679, 1699, 1707, 1737, 1752, 1767, 1796, 1821, 1839, 2030, 2073, 2100, 2208, 2250, 2282, 2322, 2369, 2455, 2531, 2666, 2845, 2852, 2863, 2895, 2913, 2958, 2966, 2996, 3014, 3044, 3100, 3121, 3197, 3350, 3432, 3614, 3643, 3772, 3781, 3799, 3806, 3850, 4010, 4130, 4175, 4227, 4228, 4286, 4330, 4495, 4525, 4613, 5316, 5340, 5657, 5667, 5710, 5791, 5822, 5827, 5862, 5887, 5894, 5917, 6002, 6011, 6015, 6020, 6034, 6056, 6063, 6096, 6100, 6121, 6126, 6130, 6134, 6138, 6148, 6155, 6159, 6170, 6175, 6353, 6576, 6687, 6699, 6706, 6708, 6759, 6858, 7051, 7216, 7220, 7224, 7398, 7426, 8073, 8129, 8181, 8192, 8198, 8428, 8659, 8906, 8958, 9003, 9068, 9205, 9523, 9628, 9954, 10012, 10066, 10145, 10354, 10507, 10521, 10569, 10927, 10976, 10982, 10994, 11034, 11219, 11351, 11388, 11507, 11542, 11594, 11609, 11622, 11653, 11705, 11744, 11776, 11806, 11812, 11842, 12000, 12095, 12101, 12289, 12350, 12527, 12546, 12664, 12809, 12820, 12840, 12903, 12909, 13355, 13400, 13513, 13849, 13908, 13993, 14079, 14083, 14117, 15323, 15476, 15820, 16043, 16128, 16376, 16418, 16529, 16601, 16603, 16830, 16976, 16995, 17005, 17140, 17144, 17454, 17539, 17988, 18020, 18072, 18131, 18258, 18272, 18340, 18487, 18548, 18712, 18771, 18775, 18779, 18863, 18909, 18913, 19397, 19532, 19606, 19624, 19628, 19757, 19888, 19944, 20026, 20075, 20081, 20094, 20179, 20336, 20369, 20386, 20390, 20396, 20769, 21001, 21012, 21015, 21070, 21071, 21099, 21103, 21173, 21283, 21372, 21383, 21406, 21410, 21423, 21489, 21590, 21854, 22464, 23457, 23768, 23863, 23891, 23992, 24047, 24487, 24537, 24679, 24880, 25076, 25303, 25308, 25550, 25554, 25622, 25663, 25687, 26314, 26388, 26556, 26624, 26735, 27530, 27786, 28058, 28180, 28214, 28240, 28369, 28373, 28380, 28400, 28404, 28410, 28493, 28494, 28495, 28615, 29043, 29125, 29267, 29424, 29554, 29676, 29688, 29790, 29802, 29929, 29988

A total of **145** representations were received in relation to Question 121 from **137** respondents. Respondents included Highways England, local residents, the NHS and agents for house builders. **Error! Reference source not found.** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Error! Reference source not found.**.

Table 86.5: Consultation Question 121: Ilkley Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q121	145	137	125	2	18

Table 84.6: Summary of Representations Received - Q121: Ilkley Preferred Site Allocations

Consultation Question 121 – Ilkley Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Location of sites • Alternative sites • General support • General comments	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

Summary of Representations
Objections
1. Location of sites – proposed sites to the east: • Sites are both green belt. Do not work from an infrastructure or geographical point of view. • Are exposed to springs and flood risk • Will create significant traffic increase which is not be sustainable. Limited access • Supports nesting Red Kites- land is a valuable natural resource. Higher impact on SPA than to west

- Is in close proximity to water treatment plant and will prevent the upgrade of the site
- Is over development- disproportionate number of homes have been allocated to the east side (91%) compared to the west
- Scale will damage local character and prevent views of the Cow and Calf Rocks
- Loss of distinction between Ilkley and Burley
- Density is too high

2. Location of sites – proposed sites to the west

- One site is green belt. 97% of all the proposed development in the town is on green belt land
- Density is too high

3. Other options/comments

- Other available plots such as large gardens and previously used industrial sites should be considered first
- The Council should address the issues of empty homes across the District and in Ilkley
- Green belt sites should not be allocated
- Housing target in the town can be met through infill development
- Reconsideration needed in relation to the land adjacent to Ashlands School and could accommodate 30-40. Greenspace loss here would be far less than from green belt sites
- Site densities should be increased – currently they are very low density and this cannot be justified when they are green belt releases
- Land behind the Factory Shop could accommodate 40-50 homes
- Reconsideration should be given to the land to the west between Hollin Hall and Caravan Club site- IL/012B. Reasons for rejection challenged including impact on the landscape and low quality pasture
- The exclusion of IL/020A should be re-examined. Reasons for rejection challenged. It can come forward without adjacent land.
- The exclusion of IL/015 challenged- the site can be delivered by a small local house builder with additional removal of the Curly Hill area along the existing curtilages
- Smaller sites will encourage Small/medium enterprises and have a lesser impact than large developments
- Challenge against the rejection of IL/044 and IL/012 as an alternative proposal to the west of Ilkley as considered to be a more sustainable location and will better distribute homes in the town
- Challenge against the rejection of IL/013 when IL/014 (IL3/H) has been allocated- disagreement relates to the rejection of the site on heritage and green belt grounds
- Challenge against the rejection of IL/016- which should be considered as it is well connected to the urban area and will have significant impact on the green belt and can deliver significant affordable housing
- Development proposed should be split with Middleton (Old Hospital site)

Support
• The location of the proposed developments unlikely to materially affect the town and will provide homes for local young people
Comments
• Smaller sites generally produce better quality housing schemes than larger ones • The sites seem reasonable options but densities should be increased • Building materials should be of high quality and development mix should be varied and be in line with the polices of the Ilkley Neighbourhood Plan • Greenfield sites should only be developed after other options built on • Concern that only wealthy will be able to afford the new homes proposed- affordable homes should be built as a priority and kept affordable. No executive homes should be built • New homes should be built to the highest environmental standards • The proposed sites are not expected to create a severe impact to road capacity on their own but could have a cumulative impact which will need to be assessed further. • Suggestion that land to the west of 162 Skipton Rd and IL2/H be considered which will have a lesser impact than the sites proposed to the east or between the River and Langbar Road • Developments should be phased to ensure infrastructure can be provided

Representation IDs: 23, 32, 52, 55, 258, 348, 413, 454, 457, 541, 594, 767, 951, 1125, 1458, 1472, 1555, 1649, 1689, 1694, 1838, 1947, 1965, 2136, 2217, 2662, 2706, 2797, 2864, 2983, 3011, 3224, 3635, 3649, 3762, 3780, 3852, 4220, 4230, 4249, 4531, 4542, 4579, 4599, 5056, 5181, 5471, 5610, 5643, 5677, 5692, 5721, 5836, 5866, 5997, 6017, 6022, 6023, 6071, 6162, 6179, 6574, 7366, 9852, 9956, 10359, 10361, 10487, 10979, 11068, 11074, 11251, 11277, 11285, 11413, 11414, 11417, 11625, 11807, 11824, 12176, 12198, 12318, 12544, 12812, 12821, 12898, 12907, 12944, 12972, 12973, 12979, 13700, 15342, 15510, 16225, 16374, 16375, 16578, 16588, 16831, 17007, 17323, 17634, 18744, 18868, 19819, 20006, 20330, 21046, 21069, 21115, 21500, 21632, 21637, 22465, 24142, 24680, 24686, 24924, 25544, 25625, 26315, 26468, 27463, 27552, 27763, 28081, 28313, 28381, 28434, 28438, 28485, 28496, 29684, 29774, 29775, 29777, 29781, 29789, 29792, 29984, 30025, 30107, 30131, 30361

2.87 MENSTON

Introduction

The Local Plan settlement hierarchy identifies Menston as one of Bradford District's 11 Local Service Centres. Based on this it is proposed that the settlement has a housing target of 350 dwellings. Two site allocations were proposed to deliver the development requirements.

Local Area Strategy

The Local Plan provides a portrait of Menston's characteristics and sets out a Local Area Strategy for its future growth and development, the key elements of which include:

- delivering new homes over the plan period (2020 to 2038)
- supporting services and facilities within the Local Centre.
- Protecting and enhancing Green Infrastructure links and protection of important areas of open spaces, and seek opportunities to increase provision parks and gardens where possible.
- Support for safe active travel routes (cycling and walking) through neighbourhoods, to services and facilities including the delivery of the Wharfedale Greenway

Summary of Consultation

The Local Area Strategy was listed as Question 122 within the Preferred Options document. A total of **10** representations were received in relation to the Menston Local Area Strategy from **9** respondents. Respondents included Highways England, Historic England, local residents, local interest groups, land/site promoters, and the Parish Council. Table **87.1** provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in Table **87.2**.

Table 87.1: Consultation Question 122: Menston Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
122	Menston Portrait & Local Area Strategy	10	9	8	0	2
	Totals	**10**	**9**	**8**	**0**	**2**

Table 87.2: Menston Portrait & Local Area Strategy - Summary of Representations Received

Menston Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
122	Menston Portrait & Local Area Strategy	10	9	8	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Level of housing growth, sites and density • Lack of open space • Development on Green Belt land • Impact on traffic and infrastructure • Flood risk • Priority to Brownfield • Employment opportunities overstated • Misclassification of lake • Changes to SP8 • Impact on SPA • Comments on traffic and number of homes	• The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy ME1: Menston, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections

1. **Level of housing growth, sites and density**
   - Menston cannot support 350 additional homes houses
   - Recent developments are not providing the housing type required – need bungalows.
   - Little scope for significant growth in Menston without breaching other policies.

- The drop in the housing target from 600 units will compress the supply, will restrict choice, increase prices and extend the affordability gap.
- Menston is a sustainable settlement with a good level of facilities, it has excellent accessibility by public transport and can accommodate further homes.

2. Open spaces

- Lack of open spaces – more houses would make this worse. Building on surrounding green space will reduce access to the nearby countryside

3. Development on Green Belt Land

- Loss of Green belt - Judgement made 8/6/2020 that it was wrong to leave Green belt sites in a development plan solely because the Council wishes to reduce the numbers around the District proportionately.

4. Traffic and Infrastructure

- Village roads are constricted, congested and very busy at peak times. Development would add to this.
- Few parking spaces in the village and the railway station.
- Lack of secondary education places for children based in Menston
- Lack of local infrastructure

5. Flood Risk

- Known issues with groundwater emergence in the area which may require complex engineering solutions.

6. Other

- There is a plentiful supply in Bradford that have not been developed. Government have stated that brownfield sites will be made easier to be built on
- Local employment opportunities are overstated – employers listed provide very few opportunities, especially to young people
- 5.18.32 is a pond not a lake.
- Special Protection Area – most of the development lies within zone B (2500m) of the South Pennine Moor SPA. Areas on eastern edge of Menston are within zone c (7000m) of the SPA.
- Question should not have been asked before publishing infrastructure plan as set out in 5.18.38.
- Changes are needed to SP8 to reflect Menston's status as a sustainable location for new housing development.

Support

No comments in support.

Comments

1. Traffic

• Development of sites within Menston, on their own, will not have a severe impact on the capacity of the Strategic Road Network, (SRN). However, the quantum of sites forms a wider cumulative impact within Menston and the rest of the development aspirations within the Plan could severely impact the SRN. This will need to be considered.
2. Number of homes • 350 homes can be achieved without Green belt release – the calculations have not included the Bingley Road site, which if completed will contribute to housing target.

Representation IDs: 460, 688, 1610, 4726, 5296, 15511, 20001, 21618, 21622, 25288

Sites

As highlighted above, 2 sites and were put forward in the Preferred Options document to meet the proposed housing development requirement for Menston. Under Q119 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites

A total of **20** representations were received in relation to the Menston site allocations from **18** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents, landowners, organisations and Parish/Town Council. Table **87.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in Table **87.4**.

Table 87.3: Overview of Representations Received – Menston Proposed Sites (ME1/H to ME2/H)

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
ME1/H - Bingley Road	12	11	10	0	2
ME2/H – Derry Hill	8	7	5	0	3
Totals	**20**	**18**	**15**	**0**	**5**

Table 87.4: Summary of Representations Received – Menston (ME1/H to ME2/H)

ME1/H – Bingley Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
ME1/H - Bingley Road	12	11	10	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on highway network • Housing allocation and density • Ecology, habitats and trees • Impact on SPA • Impact on local infrastructure • Impact on local character and heritage • Flood risk/water quality • Development of Green Belt land • General comments	• The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H584) is not carried forward as a preferred option and rejected. • Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of Representations
Objections:
1. Impact on the local highway network • Site is inappropriate – only access is from Derry Hill and connecting residential roads which would be hazardous • Traffic impact on conservation area – access roads go through Conservation area.
2. Housing Allocation/Density • Poor pedestrian and bicycle access

- Topography – takes no regard of the topography – consists of a north facing steep hillside.
- Loss of land for sheep farming
- Over shadowing of settlement – particularly Hargrave Cresent and Derry Lane.
- Adjacent fields are already under development.
- Needs a clear green boundary and buffer zone to the houses on Hargreave Crescent that include trees, hedgerows and green spaces.
- Conflicts with policy SP9: Climate change, Environmental Sustainability and Resource Use.
- Bingley road site, will contribute an additional 133 homes. This would make ME1/H surplus to requirement

3. Ecology, Habitat & Trees

- SPA – it is within 2.5km of the South Pennine Moors and will impact on it.
- Objection linked to comments on Policy SP5

4. Impact on local infrastructure

- Transport routes – it is far removed from 400m bus routes and 800m rail routes. Site will encourage use of motorised vehicles for full or part journeys. Poor public transport connectivity and provision.
- Road / Rail capacity – already full and unable to cope with present pressures placed on them – already will be affected by Sun Lane housing development once starts.
- Health provision – at full capacity and will be overwhelmed by this development.
- Education – provision is at full capacity and will be overwhelmed by this development.

5. Impact on local character and heritage

- Conservation area – site overlooks the Menston Conservation Area, 250 m to north. Development of this area could harm elements which contribute to the significance of this designated historic asset. Before allocating site for development
    1. A needs an assessment of the contribution this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and the impact of the loss of this undeveloped site and its development might have on their significance.
    2. If any harm is identified, then measures by which that harm could be removed or reduced need to be effectively tied into the plan.
    3. If concluded that there would still be harm to these listed buildings then this site should not be allocated unless there are clear public benefits that outweigh the harm.

6. Flood risk/water quality

- Flooding – concerns raised by previous submissions have not been addressed. CBMDC continues to ignore the evidence that the site and higher ground contains aquifers and stores groundwater. Heavy rain leads to an overloading of Menstons Victorian drainage system and flooding downstream. Site is subject to flood risk.

7. Development of greenfield/Green Belt land

- Loss of green belt – when lost provision of alternative green space is not addressed. Site is currently designated as green belt.
- Development of ME1/H and release from the Green Belt is contrary to proposed policy.

8. Other

- Site is unsuitable for development.

Support:

No comments in support

Comments:

- Site has the potential for loss of functional land linked for SPA birds - Council needs to use model to identify suitability of sites for SPA Golden Plover and recommend that allocations are screened against the dataset – an approach is given. Where the loss of functionally linked land cannot be ruled out we recommend that allocation requirement text in the plan sets out survey and mitigation requirements clearly.
- Site in flood zone 1 only – mitigation should be set – see Environment Agency standing advice for this). Surface water discharge rates post development should be restricted to the pre development Greenfield discharge rate. Need to consider the future SFRA Consideration must be made to making space for water and providing betterment in terms of flood risk management where ever possible.

Representation IDs: 689, 1614, 4375, 4584, 4727, 5267, 5482, 19892,21620, 28599, 28618, 29425

ME2/H – Derry Hill

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
ME2/H – Derry Hill	8	7	5	0	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on highway network • Housing allocation and density • Ecology, habitats and trees • Impact on SPA • Impact on local infrastructure and services • Impact on local character • Flood risk/water quality • Development of Green Belt land • Impact on Conservation area • Affordability of housing • General comments	This site is under construction and is identified as H572 in the Regulation 19 Local Plan.

Summary of Representations
Objections:
• Flood Risk – evidence has been ignored.

- Flooding – will overcharge the drainage facilities in the village; site will lead to increased flooding in the area;
- Access – difficult from main traffic routes; has to be through Menston village, will need to be via road.; transport infrastructure for roads and rail will be inadequate; inappropriate due to access through Derry Hill.
- Will increase traffic through the conservation area.
- Station – is currently full by early rush hour and developments in Otley will lead to increased demand.
- Development already underway with granted planning permission despite objections and legal battles.
- Consultation should have been prior to the development.
- Loss of grazing land
- Loss of recreation opportunity
- Visual – eyesore
- Access can only be taken from adjacent development
- Development will destroy the transition from village to countryside and green end of village.
- Mud cause by development was predicted
- Type of property is not what Menston village needs
- Type of housing will bring more commuters to live in Menston.
- Will increase traffic on roads into Leeds and Bradford.
- No special circumstances for this development.
- Loss of green belt
- Lack of alternative green space provision
- New housing is unlikely to be affordable;
- New housing will be out of character with the older properties on the lane.
- Development will have negative impact on the character of the village.
- Menston Conservation Area – development of this area could harm elements which contribute to the significance of this designated heritage asset. The Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of it's conservation Areas. Site proforma should make reference to the sites proximity to the Conservation Area, or to the

need to ensure that those elements which contribute to the significance of this designated heritage asset are not harmed by development. Wording for this is provided.

- Agricultural land – site is on land which may be the best and most versatile agricultural land. The long term capability of such should be safeguarded. Sites over 5ha should have ALC surveys undertaken to determine the ALC grade and impact of site on soil resources.

Support:

No comments in support of this policy.

Comments:

- Lies in proximity to the South Pennine Moors (Phase 2) Special Protection Area (SPA) – potential to lead to the loss of functionally linked land for SPA birds.
- Model to identify the suitability of sites for SPA golden plover should be used and allocation should be screened against the dataset .
- The WY Ecology Service Bird Survey Methodology should be followed. Area not within an area of predicted Golden Plover presence.
- Where loss of functionally linked land cannot be ruled out text in the plan needs to set out survey and mitigation requirements clearly.
- Site in flood zone 1.
- Mitigation should be set above the 1 in 100 plus cc level for the site as suitable for the proposed vulnerability classification (EA standing advice should cover this)
- If site is considered greenfield then surface water discharge rates post development should be restricted to the pre development Greenfield discharge rate. Should be in line with SUDs design principles.
- For developments near ordinary watercourses we would recommend an 8 metre easement strip along the length of the riverbank, or 45-degree angle from the bed in the case of culverts, to be kept clear of permanent structures such as buildings.
- It is possible the sites within close proximity to Flood Zones 3b, 3 and 2 may be subject to future risk identified within the SFRA (to follow) which may affect its allocation or how development should be sequentially laid out on the site.
- Consideration must be made to making space for water and providing betterment in terms of flood risk management where ever possible.

Representation IDs: 1635, 4376, 5259, 7807, 19893, 19914, 28619, 29426

A total of **10** representations were received in relation to Question 123 from **8** respondents. Respondents included Highways England, local residents, the parish council and a site promoter. **Table 87.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 87.6**.

Table 87.5: Consultation question 123: Menston Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
123	10	8	8	0	2

Table 87.6: Consultation Question 123: Menston Preferred Site Allocations - Summary of Representations Received

Menston Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Challenges against rejected sites • General comments	• The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis.

Summary of Representations
Objections
1. Other options/comments • Challenge against rejection of ME/002. The Council did not include site due to landscape impacts but there is no document covering landscape impact in evidence base. Assuming Council using site appraisal comments in the Sustainability Appraisal. This states development would lead to the loss of green infrastructure elements such as trees that are of high visual amenity and would have likely adverse impact upon the town and local character. Our assessment concludes differently. The development would not result in the loss of any landscape features holding individual landscape or visual value or that is of a specific importance to the wider landscape character. Existing landscape features would be incorporated as part of the new development. In addition, new planting,

retained vegetation would contribute to the well wooded character of the locality and help to integrate the development into the landscape.

- Challenge against the rejection of ME/005 which should be allocated. If council has to apportion more sites to Menston through the standard method level, this site should be allocated to account for the additional units needed. Each house should include re insulation, air-tightness, day light levels, orientation; renewable heating sources; rainwater harvesting; glazing; ventilation and heat recovery and position of the land. Project to start with 2 houses and increase to 10 if possible. ME/005 – Green belt assessment – site has been rejected on Green Belt impact and landscape impact grounds. Green belt assessment cannot be located within the Council's evidence base. ME/005 – should not be excluded as proposed housing allocation as deliverable; suitable; available & achievable fore greenfield sites - Green belt sites should be removed from the plan.
- Challenge against the rejection of ME/013. The site is suitable, available, deliverable and achievable and performs favourably against the preferred options. It can be safely accessed direct from Otley Road and complies to the Accessibility standards. It does not appear to be in the SA and SEA which forms part of the Local Plan evidence base. Disagree with the green belt assessment- it should be downgraded to moderate. Housing targets should be higher in the settlement
- Challenge against the rejection of ME/017 (with amendment to boundary). The site can be developed for eco houses to latest technology that reduces the carbon footprint and lowers the energy requirement.
- Bradford has a plentiful supply of brownfield sites. Green belt sites should be removed until all brownfield sites are developed
- Housing target is excessive – road unable to cope and insufficient places at primary school.
- Menston has no secondary school – Menston children go to Leeds schools, (Guiseley) or elsewhere which causes commuter problems.
- All available greenspace has been built on apart from the small park and bits of Public Open Space.
- Traffic congestion due to narrow and congested streets in Menston.
- Road safety issues for pedestrians and other road users.
- High Royds development affects Menston.
- Want Menston to remain as a village.
- Bingley road site, will contribute an additional 133 homes. This would make ME1/H surplus to requirement.

Comments

- It is not considered that locating development within Menston settlement will have a severe impact on capacity, operation and safety of the Strategic Road Network. The cumulative impact will need to be considered.
- Loss of greenbelt

Representation IDs: 459, 1615, 4732, 15512, 20002, 21585, 29692, 29693, 29694, 30116

2.88 CULLINGWORTH

Introduction

The Local Plan settlement hierarchy identifies Cullingworth as a Local Service Centre. This means that it will see a smaller scale of development, comprising both market and affordable housing, as well as the protection of its local centre to help ensure the continued provision of economic activity in the area.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Cullingworth's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as consultation question 124 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **7** representations were received in relation to the Cullingworth portrait and Local Area Strategy (Question 124) from **6** respondents. Respondents included, Highways England, the Great Northern Railway Trail Development Group, local residents, the Parish Council and a Ward Councillor. **Table 88.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 88.2**.

Table 88.1: Consultation Question 124: Cullingworth Portrait & Local Area Strategy Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
124	Cullingworth Portrait & Local Area Strategy	7	6	1	0	7
	Totals	**7**	**6**	**1**	**0**	**7**

Table 88.2: Cullingworth Portrait & Local Area Strategy - Summary of Representations Received

Cullingworth Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
124	Cullingworth Portrait & Local Area Strategy	7	6	1	0	7

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on highway network • Impact on local infrastructure/services • Density • Population/Housing Calculation • Sites • Great Northern Railway	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy CU1: Cullingworth, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. Development on Green Belt land: • It is wrong to build on Green Belt when Brownfield sites are available. Remove Green Belt development sites from the plan. • Development of Brownfield sites should be made easier to protect Green Belt.
Support
No representations received in support.

Comments
1. Impact on highway network: • Development in Cullingworth would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
2. Great Northern Railway • Continue to protect the route of the Great Northern Railway Trail for cycling, walking and horse riding. • The Great Northern Railway Trail, part of the National Cycle Network, is a work in progress. Cullingworth is already linked to Harecroft. Essentially it is a local asset valued by the community for the community for the purpose of recreation, wildlife, railway heritage, and for journeys to work. Once connected, it will attract many more tourists
3. Population/Housing Calculation • The population and calculation of housing is quoted based on the 2011 Census and does not consider the new housing estate (David Wilson Homes) at Hewenden Ridge, Cullingworth. • Historical data used from 1991 census suggesting no growth in total population. • Collection of the 2020 precept payments was made by 1581 homes not 1371 as quoted in this settlement description. • The total population of the village is quoted at 2,937, when according to Cullingworth Conservation Area Assessment prepared by Bradford Council in January 2003 it states at the time of the 1991 census the population of Cullingworth stood at 2,993, which is greater than the figure quoted in Feb 2021. • Concerns that the calculation of numbers at the local level make little sense as they seem not to reflect current and recent development. Cullingworth benefitted from a significant (237 home) development by David Wilson Homes
4. Impact on local infrastructure/services: • The infrastructure cannot cope with more new developments. • Infrastructure should be aligned with current and future developments
5. Density: • Housing density of 35 homes per hectare for rural locations when rural locations should be allowed to incorporate smaller developments to protect the heritage and rural authenticity of Cullingworth.
6. Sites

- CU1/H Former Station Yard, (subject of a reserved matters application)
- CH2/H Cullingworth Mill. Agree in principle but have concerns.
- CU3/H Cullingworth Road/Doll Lane. This is green belt and would damage the unique character of the village and would form the beginnings of an urban sprawl.
- Brownfield sites exist as an alternative as per application 19/03606/MAO (outline approval granted), together with Old village Hall site.

Sites

As highlighted above, three sites were put forward in the Preferred Options document to meet the proposed development requirements for Cullingworth (all 3 for residential). Under consultation question 125 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of 15 representations were received in relation to Sites CU1/H. CU2/H and CU3/H from 8 respondents. Respondents included Government bodies (Environment Agency and Historic England), local MP, CPRE West Yorkshire, local residents, Cullingworth Parish Council and a Ward Councillor. **Table 88.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 88.4**.

Table 88.3: Cullingworth Proposed Sites (CU1/H to CU3/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CU1/H: Halifax Road	3	3	0	0	3
CU2/H: Cullingworth Mill	5	4	1	0	4
CU3/H: Cullingworth Road/Doll Lane	7	7	5	0	2
Totals	**15**	**14**	**6**	**0**	**9**

Table 88.4: Cullingworth Proposed Sites (CU1/H to CU3/H) - Summary of Representations Received

CU1/H: Halifax Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CU1/H: Halifax Road	3	3	0	0	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Flood risk/drainage • Route of the cycleway • Current use of the site	Since the consultation on the Regulation 18 Local Plan was undertaken, this site has now been developed out and is in residential/other use and is therefore no longer allocated in the Plan.

Summary of Representations
Objections:
No representations received in objection.
Support:
No representations received in support.
Comments:
1. Route of the cycleway: • The proposed position of the extension of the Great Northern Railway Trail is of great concern.
2. Current use of the site: • The site is used for fly tipping. The mill site is need of regeneration.

- This site has outline planning permission and pre-application discussions regarding reserved matters are underway. The site is previously developed land.

3. Flood risk/drainage:

- The site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. For Brownfield sites there should be a 30% reduction in surface water discharges or restricted to Greenfield rates. There should be no increase in brownfield surface water discharge post-development. SuDs design principle should apply.

Representation IDs: 28716, 28830, 29650

CU2/H: Cullingworth Mill

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CU2/H: Cullingworth Mill	5	4	1	0	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Heritage assets • Site access, pedestrian and transport options • Green/Blue infrastructure • Flood risk/drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H270) is not carried forward as a preferred option and excluded / rejected. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA). Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Objections:

1. **Proximity to heritage assets:**
   - Site in close proximity to the Cullingworth conservation area and grade II listed buildings. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be an adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.

Support:

No representations received in support

Comments:

1. **Site access, pedestrian and transport options:**
   - Access to the site is through a narrow archway close to a busy junction. Pedestrian access is narrow with no existing footpath. There are good public transport connections.
   - The access to potential sites is via a narrow lane which currently can't sustain construction traffic and will need to be upgraded before any prior works.

2. **Flooding/drainage:**
   - The site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. From Brownfield sites there should be a 30% reduction in surface water discharges or restricted to Greenfield rates. There should be no increase in brownfield surface water discharge post-development. SuDs design principle should apply.
   - Site has flooding issues that need to be addressed. Significant surface water flooding plus a culvert running under the site.

3. **Heritage assets:**
   - The mill could be regarded as an undesignated heritage asset. Site is adjacent to Grade II listed building. The entrance arch would need to be incorporated into the design.

4. **Green/Blue infrastructure:**
   - There is an opportunity to open up the culverted Manywells Beck for Blue-Green infrastructure as part of the development of the site. This should be acknowledged in the development considerations.

5. **Impact on ecology/biodiversity**
   - Site in a bat alert areas and ecological surveys would be required.

Representation IDs: 28717, 28831, 29263, 29427, 29652

CU3/H: Cullingworth Road / Doll Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
CU3/H: Cullingworth Road/Doll Lane	7	7	5	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Wildlife • Traffic • Green Belt • Flood risk/drainage • Public transport • Public rights of way • Heritage assets and character • Proposed site access • Impact on the environment and trees • Development of Green Belt/greenfield land	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H279) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Development of Green Belt/greenfield land:**
   - Development of the site would encroach on the surrounding green belt and an iconic view around the Hewenden Viaduct.

- Site is in the Green Belt / Green Belt sites should not be developed / alternative sites are available.
- Development goes against Policy SP5.
- Green Belt should be maintained to preventing urban sprawl and keeping land permanently open.
- There are acceptable alternatives to development of this Green Belt site.

2. Impact on the environment and trees:

- Impact on woodland habitat / wildlife / needs to be protected / a buffer would be expected on the southern edge to enhance the woodland.
- Site adjoins priority woodland and the habitat network and a buffer would be expected to enhance this woodland.

3. Proposed site access:

- Access to site will be dangerous due to change in speed on that part of the road / poor access/ speed calming measure would need to be implemented.

4. Heritage assets and character

- Impact on the heritage site of Hewenden Viaduct.
- Development would have a significant impact on the unique character of Cullingworth.
- Relatively small you would hope other more sympathetic sites could be found locally.

5. Public rights of way:

- Great Northern Railway Trail runs along the southern border.

6. Public transport

- No public transport links.
- Poor public transport

Support:

No representations received in support.

Comments:

1. Flood risk/drainage:

• The site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.
2. Green Belt • The site is in the green belt and adjoins the eastern urban edge of the village.
3. Traffic • Cullingworth Road is a busy road and speed calming measures would need to be implemented.
4. Wildlife • Development would have an effect adverse on wildlife.

Representation IDs: 2403, 4055, 5481, 28595, 28718 ,28832, 29653

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 125 within the consultation document.

Summary of Consultation

A total of **6** representations were received in relation to Question 125 from **5** respondents. Respondents included Highways England, local residents, a ward councillor and Cullingworth Parish Council (2 responses). **Table 88.6** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 88.6**.

Table 88.6: Consultation Question 125: Cullingworth Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q125	6	5	2	0	4

Table 88.6: Consultation Question 125: Cullingworth Preferred Site Allocations - Summary of Representations Received

Question 125 – Cullingworth Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Housing Supply/Sites • Impact on the highway network • Housing Supply/Sites • Local Infrastructure/Services • Built Environment	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy CU1: Cullingworth, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections

1. **Development of Green Belt land:**
   - Green belt should be removed from the plan and brownfield sites built on first
   - Rejected site - CU/008 should be released from the Green Belt for housing development

2. **Housing Supply/Sites**
   - Bradford has a plentiful supply of brownfield sites that have not been developed.
   - Brownfield sites should be made easier to develop to protect Green Belt.
   - Rejected site - CU/008 should be a housing allocation in the new Local Plan. It is more preferable than CU3/H as it is enclosed by other housing developments. CU/008 would be a sensible rounding off of the Green Belt boundary. A detailed case for development is supplied as part of this objection and the landowner is supportive of this allocation.

Support

No representations received in support.

Comments

1. **Impact on the highway network**:
   - Development in Cullingworth would not on its own have a severe impact on the Strategic Road Network.
   - It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

2. **Housing Supply/Sites**
   - The old village hall site, which has potential for housing is a brownfield site, which Bradford Council own and could potentially offer a further 10 housing units.
   - There's a site near the Manywells development, which is earmarked for development. An application for housing has been withdrawn, which would have provided 25 houses. See 19/03606/MAO.
   - It has to be recognised that Cullingworth is undergoing the largest increase in housing stock in the local district over the last seven years.

3. **Local Infrastructure/Services:**

Summary of Representations
• Future development to be kept minimal to afford the infrastructure to be improved to cope with the additional pressures.
4. Built Environment: • Further development to be contained within the confines of the village to maintain our rural, historical heritage and avoid the beginnings of an urban sprawl. Therefore, substitute site CU3/H Cullingworth Road/Doll Lane for site at Manywells Brow (25 Units).

Representation IDs: 480, 4794, 15514, 28837, 29654, 29655

2.89 DENHOLME

Introduction

The Local Plan settlement hierarchy identifies Denholme as a Local Service Centre. It is envisaged that Denholme will see a small scale of development, comprising both market and affordable housing, as well as the protection of its local centre to help ensure the continued provision of economic activity in the area. There is one site allocation in Denholme – DH1/H Station Road which is proposed to deliver 72 dwellings.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Denholme's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as question 126 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **2** representations were received in relation to the Denholme portrait and Local Area Strategy (Question 126) from **2** respondents. Respondents were Highways England and the Great Northern Railway Trail Development Group. **Table 89.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 89.2**.

Table 89.1: Consultation Question 126: Denholme Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
126	Denholme Portrait & Local Area Strategy	2	2	0	0	2
	Totals	**2**	**2**	**0**	**0**	**2**

Table 89.2: Consultation Question 126: Denholme Portrait & Local Area Strategy - Summary of Representations Received

Denholme Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
126	Denholme Portrait & Local Area Strategy	2	2	0	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on highway network • Great Northern Railway	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy DH1: Denholme, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
No representations received in objection.
Support
No representations received in objection.
Comments
1. Impact on highway network: • Development in Steeton and Eastburn would not on its own have a severe impact on the Strategic Road Network.

Summary of Representations
• It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.
2. Great Northern Railway • Continue to protect the route of the Great Northern Railway Trail for cycling, walking and horse riding within this former railway line, as part of the National Cycle Network.

Representation IDs: 17297, 15516

Sites

As highlighted above, one site was put forward in the Preferred Options document to meet the proposed development requirements for Denholme (for residential). Under consultation question 127 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of 4 representations were received in relation to Site DH1/H from **4** respondents. Respondents included Government bodies (Environment Agency and Natural England), a Ward Councillor and the Great Northern Railway Trail Development Group.

Table 89.3 (below) provides a breakdown of the representations to the site by nature of response. The issues raised together with CBMDC's response are set out in Table 89.4.

Table 89.3: Denholme Proposed Site(s) (DH1/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
DH1/H: Station Road	4	4	1	0	3
Totals	**4**	**4**	**1**	**0**	**3**

Table 89.4:: Denholme Proposed Site(s) (DH1/H) - Summary of Representations Received

DH1/H: Station Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
DH1/H: Station Road	4	4	1	0	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Infrastructure • Impact on the highway network • Great Northern Railway Trail • Impact on Soth Pennine Moors • Flood risk/drainage	Since the consultation on the Regulation 18 Local Plan was undertaken, this site has now been developed out and is in residential/other use and is therefore no longer allocated in the Plan.

Summary of Representations
Objections:
1. Infrastructure: • Denholme is perhaps the most ill served with infrastructure of all our villages, yet it is to have a further 72 houses
2. Impact on the highway network: • The attendant cars will significantly increase traffic already contending with numerous heavy goods vehicles that blight people's lives.
Support:
No representations received in support.

Summary of Representations
Comments:
1. Great Northern Railway Trail: • The Great Northern Railway Trail is located alongside this housing development within the development site. Bradford planners and the developer need to recognise the importance of this proposed section of the Trail as part of the National Cycle Network. We were treated as a third party with no weight to co-operate other than as a formal consultee. If planning policy is to change direction towards sustainable travel in future, then much more collaboration is needed from the outset.
2. Impact on Soth Pennine Moors: • The site lies in proximity to the South Pennine Moors (Phase 2) SPA and has potential to lead to the loss of functionally linked land for SPA birds. • Where loss of functionally linked land cannot be ruled out at this stage we recommend that allocation requirement text in the plan sets out survey and mitigation requirements clearly.
3. Flood risk/drainage: • Parts of the site are located with Flood Zones 2, 3 and 3b/3a(i). • No development should take place in 3b/3a(i) unless water compatible or essential. Development must demonstrate no increase in risk to others, no loss of Functional Floodplain and suitable mitigation measures for use and the lifetime of the development. • Development should follow a sequential approach to prevent un-necessary development in 3b 3 and 2. • Guidance provided on appropriate flood mitigation measure and surface water discharge rates.

Representation IDs: 17298, 19722, 19883, 28725

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 127 within the consultation document.

Summary of Consultation

A total of **2** representations were received in relation to Question 127 from **2** respondents. Respondents included Highways England, and a local ward Councillor. **Table 89.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 89.6**.

Table 89.5: Consultation Question 127: Denholme Preferred Site Allocations - Overview of Representations Received -

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q127	2	2	0	0	2

Table 89.6: Consultation Question 127: Denholme Preferred Site Allocations - Summary of Representations Received

Question 127 – Denholme Preferred Site Allocations

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on the highway network • Provision of Infrastructure • Impact on Settlement Size	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy DH1: Denholme, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

Summary of Representations
Objections
No representations received in support.
Support
No representations received in support.
Comments
1. Impact on the highway network: • Development in Denholme would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan. • The new development would cause increased traffic, and the area has major issues with heavy goods traffics flowing • through the village.
2. Provision of Infrastructure: • There is a lack of facilities: schools, doctor surgeries etc, in the community.
3. Impact on Settlement Size: • Denholme is a small area where a small number of new homes increase the size of the settlement by a large %.

Representation IDs: 15516, 28904

2.90 HARDEN

Introduction

The Local Plan settlement hierarchy identifies Harden as a Local Service Centre. This means that it will see a smaller scale of development, comprising both market and affordable housing, as well as the protection of its local centre to help ensure the continued provision of economic activity in the area. The local plan sets out a minimum requirement of 60 dwellings to be delivered in Harden during the plan period. There are 4 preferred housing site allocations which could result in 64 dwelling being built during the plan period.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Harden's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as question 128 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **12** representations were received in relation to the Harden portrait and Local Area Strategy (Question 128) from 12 respondents. Respondents included, Highways England, local residents, the Parish Council and a Ward Councillor. **Table 90.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 90.2**.

Table 90.1: Consultation Question 128: Harden Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
128	Harden Portrait & Local Area Strategy	12	12	7	1	4
	Totals	**12**	**12**	**7**	**1**	**4**

Table 90.2: Summary of Representations Received - Harden Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
128	Harden Portrait & Local Area Strategy	12	12	7	1	4

Harden Portrait & Local Area Strategy	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Impact on local infrastructure/services • Impact on character and community • Impact on highway network • Impact on open/green space • Impact on Trees • Sustainable Travel • Business and Employment • Impact on local infrastructure/services • Pollution from traffic	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy HR1: Harden, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. Development on Green Belt land: • Bradford has a plentiful supply of brownfield sites that have not been developed, brownfield building should be made easier to protect Green Belt.

- This proposal erodes the very fabric of Harden village by arbitrarily re-designating precious green belt and introducing a creeping sprawl towards the reality of a Greater Bradford.

2. Impact on local infrastructure/services:

- The volume of proposed development is not accompanied by proposed improvements in infrastructure.
- Concerns regarding the increased capacity requirement for school's need be catered for.
- School is at capacity.

3. Impact on character and community:

- People are drawn to live in Harden because it is one of the very few semi-rural villages still remaining in the area. Increased housing is not a welcome change, with regards to traffic, school oversubscription, reduction of green area and wildlife, increasing antisocial behaviour.
- There has been substantial development of properties in recent years which have seen trees felled and green expanse gone. Stop pushing to build more and more across these areas. Hopefully, Harden can retain its village feel.
- This proposal appears to pay nothing but lip service to existing residents' knowledge with regard to the capacity and quality of Harden village.
- Historic village is turning into a town.

4. Impact on highway network:

- The plans for Harden risk causing significant increases in traffic through the village, and to surrounding areas, with no accompanying preventative measures. This is against local plan's policies on sustainable transport.
- Long Lane is particularly bad with the number of parked vehicles forming one way traffic which has the effect of long queues forming and extremely bad traffic flow.
- The school needs to be protected by a calmed area the hinderance of parked vehicles appears not to have been accounted for.
- The housing proposed in Wilsden and Cullingworth will cause major issues on the existing infrastructure as the main route to Bingley/Aire Valley passes through the village.
- Traffic issues including speeding and parking.

5. Impact on open/green space:

- Proposed dwellings will destroy green fields.

6. Impact on Trees:

- Tree Protection Orders are in place within the village and some of the proposed dwelling areas.

7. Sustainable Travel

- Harden is an extremely car dependent community. It should be a short bus or cycle ride to a well-served train station, or a 30 minute walk.
- There is a lack of a safe active travel route, and poor bus timetabling means what should be a half-hourly service is more like hourly and does not join up with the trains.
- Active travel links should connect Harden's important green spaces with neighbouring villages and Bingley.
- Public transport system needs to be improved.
- Reference to good footpaths and cycle routes is incorrect, the only route to Bingley is down Harden Road with no cycle path and an inadequate footpath. Due to the amount and speed of traffic this is a dangerous route.

8. Business and Employment

- The businesses within the village are mostly family run and will not facilitate further employees.

9. Heritage:

- Grade II and Grade II listed buildings will be adversely affected.

10. Impact on Wildlife:

- There are badger sets and badgers roam freely in gardens and countryside within Harden. Further building work will cause problems for these protected creatures.
- There are families of foxes with dens in and around the village.

Support

Harden Village Council has no comment to make on this question

Comments

1. Impact on highway network:

- HR2/H, HR3/H and HR4/HC would all need to have access onto Long Lane and would increase traffic and congestion on Long Lane which is the most congested road in Harden

- Due to cars parking on Long Lane, the road is often reduced to a single lane, with traffic forced to wait to take turns using it. There is nowhere alternative parking for the residents of Long Lane, increasing the traffic on Long Lane could only make it worse.
- Long Lane a slim carriageway is not fit for more traffic between Harden and Cullingworth and not designed for modern levels of traffic. This is a high risk to pedestrians especially school children and the elderly.
- 64 additional homes will increase traffic through the village and create pollution.
- Development in Harden would not on its own have a severe impact on the Strategic Road Network.
- It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

2. Housing Mix:

- There is a demand for housing for older people. The majority of large, detached dwellings are occupied by the elderly who want to stay in the area but there is a shortage of smaller quality properties.

3. Impact on local infrastructure/services:

- Harden Primary School will be exposed to more pollution with the increase in family cars and service vehicles proposed developments will generate. Increasing the number of homes, and inevitably the size of the school, plus the number of vehicles on Long Lane; would put youngsters and staff at unnecessary risk.
- Harden is a community with an elderly population that needs access to health care facilities. Priority should be given to provide a Doctors' Surgery in Harden.

4. Pollution from traffic:

- We must not put children unnecessarily at risk from air pollution.

Representation IDs: 481, 3179, 3377, 4561, 4810, 5090. 5518. 5670. 7240, 7266. 15517. 28990

Sites

As highlighted above, four sites were put forward in the Preferred Options document to meet the proposed development requirements for Harden (all 4 for residential). Under Q129 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of 36 representations were received in relation to Sites HR1/H to HR4/HC from 36 respondents. Respondents included Government bodies (Environment Agency and Historic England), Harden Village Council, the local MP, a local land agent, CPRE West Yorkshire, local residents and a Ward Councillor. **Table 90.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 90.4**.

Table 90.3: Harden Proposed Sites (HR1/H to HR4/HC) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HR1/H: Chelston House	12	12	9	1	2
HR2/H: South Walk	7	7	5	1	1
HR3/H: Long Lane	11	11	9	0	2
HR4/HC: Braes Castle, Long Lane	6	6	4	1	1
Totals	**36**	**36**	**27**	**3**	**6**

Table 90.4: Harden Proposed Sites (HR1/H to HR4/HC) - Summary of Representations Received

HR1/H: Chelston House

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HR1/H: Chelston House	12	12	9	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Impact on local infrastructure/services • Proposed site access point • Proposed Housing Density • Alternative proposal • Impact on wider environment and biodiversity • Flood risk and drainage • Heritage assets and character • Food growing • Site delivery • Heritage assets and character • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H352) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Development of Green Belt/greenfield land: • Site is in the Green Belt and should be protected.
2. Impact on local highway network:

• Issues of increase traffic volume, noise, pollution and road capacity.
• Poor access to public transport necessitating the use of cars causing congestion.
3. Proposed site access point: • Access to the site is on a bend on a fast road.
4. Proposed Housing Density: • Density of houses proposed for the site should be reassessed.
5. Alternative proposal: • Alternative sites are available (e.g. North Walk Road, Long Lane).
6. Impact on wider environment and biodiversity: • Wildlife / ecology issues, presence of fox/badger sets, other wildlife including deer, bats, owls etc, TPO trees (3 healthy mature veteran trees), 500m from ancient woodland. Assessment required.
7. Flood risk and drainage: • Site slopes to rear of properties on Chelston Park causing flooding issues which would get worse with development. • Watercourse flowing to site's western edge, impacts of surface water flooding/flood risk.
8. Heritage assets and character: • Archaeological significance of the land adjacent to Braes Castle should be considered.
• Harden and Wilsden will lose their distinctive characteristics due to continual erosion of village boundaries. Boundaries should be strengthened and utilised as a creeping land grab policy.
• Site located close to Grade II* Harden Hall and the non-designated Braes Castle. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be an adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.
9. Food growing: • Site could be used as a community garden for food growing.

Support:
1. Site delivery: • Site owners confirm availability of the site and are keen to progress its development.
2. Heritage assets and character: • Site will be designed to take account of the setting of the grade II* Harden Hall.
Comments:
1. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 1345, 1347, 1350, 1400, 3630, 5091, 5480, 7138, 9515, 19723, 28711, 29428

HR2/H: South Walk

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HR2/H: South Walk	7	7	5	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local infrastructure • Impact on the local highway network • Location of the proposed site access • Affordable housing • Heritage assets and character • Development of greenfield/Green Belt land • Flooding/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H353) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. **Impact on local infrastructure**: • There are capacity issues at the school.
• Fragile infrastructure of the village. More housing will mean more trips outside of the village.
2. **Impact on the local highway network**: • Congestion on the main road is already a problem. Site will increase traffic volume, noise and pollution. Road is already at capacity.
• Poor access to public transport necessitating the use of cars causing congestion.

3. **Location of the proposed site access**: • Access to site may be better achieved through HR1/H and part of rejected site HR/013.
• South Walk will require significant improvement as will access onto Long Lane.
• Access not viable as South Walk is a single lane road with buildings either side preventing widening.
4. **Affordable housing**: • No affordable housing being built and too many executive homes.
5. **Heritage assets and character**: • Development should ensure that it does not harm the elements which contribute to the significance of the world heritage site through long distance views.
6. **Development of greenfield/Green Belt land**: • Object to Green Belt land being used.
Support:
No representations received in support
Comments:
1. Flooding/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 3388, 4811, 4957, 5092, 19724, 28712, 29429

HR3/H: Long Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HR3/H: Long Lane	11	11	9	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Impact on local highway network • Impact on wider environment and biodiversity • Heritage assets and character • Impact on local highway network • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H1566) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Development of Green Belt/greenfield land: • Site should remain as Green Belt. Site is good quality farm land and should be protected. Impact on natural boundaries and too much sprawl.
2. Impact on local highway network: • Site would add traffic to Long Lane and is regularly congested. Potentially dangerous and potential for accidents. Capacity of narrow roads.
• There is poor access to public transport.

3. Impact on wider environment and biodiversity: • Development of the site will lead to the loss of wildlife.
4. Heritage assets and character: • There is a grade II listed farmhouse close to the site.
• The site is close to a number of Grade II listed buildings/structures, most notably Ivy House Farmhouse, Hill End Farmhouse and the Hostel Stone. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be an adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.
Support:
No representations received in support
Comments:
1. Impact on local highway network: • The main road is noisy and dangerous.
• Additional traffic calming measures should be implemented in the village if this development proceeds.
2. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply. •

Representation IDs: 2333, 3394, 3665, 3789, 5094, 8156, 9516, 19725, 28596, 28713, 29430

HR4/HC: Braes Castle, Long Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HR4/HC: Braes Castle, Long Lane	6	6	4	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Proposed site access • Impact on the local highway network • Planning permission • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H349) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Proposed site access: • Access onto Long Lane is inappropriate and there is insufficient capacity to improve it. Development will exacerbate traffic issues on Long Lane. The current access road is a narrow one track lane with very restricted view when emerging on to Long Lane.
2. Impact on the local highway network: • Cumulative impact of this site and others on the capacity of Long Lane. Developments will increase traffic volume, congestion, noise, pollution. The bridges at the Malt and Long Lane are unsuitable for increased volumes of traffic.
• There is poor access to public transport will necessitate use of cars, increasing trips and congestion.

Support:
1. Planning permission: • The site has a long standing planning permission.
Comments:
1. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 3395, 4812, 4975, 5096, 19726, 28714

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 129 within the consultation document.

Summary of Consultation

A total of **7** representations were received in relation to Question 129 from **7** respondents. Respondents included Highways England, Harden Village Council (2 responses), a local Land Agent, PADD Ltd and local residents. **Table 90.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 90.6**.

Table 90.5: Consultation Question 129: Harden Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q129	7	6	6	0	1

Table 90.6: Summary of Representations Received - Q129: Harden Preferred Site Allocations

Harden Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Development of Green Belt land • Impact on Character of Village • Impact on Environment, Wildlife and Trees • Impact on local infrastructure/services • Impact on the local highway network • Housing Need • Housing Supply • Impact on the highway network	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy HR1: Harden, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. Development of Green Belt land: • Bradford has a plentiful supply of brownfield sites that have not been developed, these should be built on before Green Belt sites. • Adverse effects on greenfield and green belt land.
2. Impact on Character of Village: • Proposals will lead to loss of identity as a historic village and Harden will become a town without towns facilities. • Detrimental impact on Grade II and Grade II Listed Buildings close to said proposed dwellings. • Harden will lose a high percentage of its charm and appeal.
3. Impact on Environment, Wildlife and Trees • There are a number of tree protection orders in place on or adjacent to the proposed dwelling sites. • Badger sets and fox dens will be adversely affected by proposed developments, these are protected creatures.
4. Impact on local infrastructure/services: • The school is at capacity and cannot take more pupils.
5. Impact on the local highway network: • The village cannot support the level of traffic it already has and there are increased issues of high speeding vehicles and parking.
6. Housing Need • The landowner of HR1/H are keen to develop the site and confirm its availability. Bradford will need to provide more housing than shown in the draft plan and this site could contribute to this.
7. Housing Supply • Suggested that development of the east 1/3rd of the rejected HR/013 site is a viable alternative and would provide a strong boundary for the Green Belt. Vehicle access would be via the Chelston House site onto Wilsden Road. The definitive footpath from North View to the Ivy House farm track could be retained. Access to public transport, medical facilities and the village centre is good and certainly

Summary of Representations
significantly better than that provided by HR3/H. There would be no impact on the view towards Goitstock and Harden Beck Valley. There are some advantages to further development here, over development of HR3/H. • Land at Coytfield, Harden is submitted as a call for sites. This land should be allocated in the plan.
Support
No representations received in support
Comments
1. Impact on the highway network: • Development in Harden would not on its own have a severe impact on the Strategic Road Network. • It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

Representation IDs: 482, 3378, 5517, 7239, 15518, 19831, 23474

2.91 HAWORTH

Introduction

The Local Plan settlement hierarchy identifies Haworth as a Local Service Centre. This means that it will see a smaller scale of development, comprising both market and affordable housing, as well as the protection of its local centre to help ensure the continued provision of economic activity in the area.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Haworth's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as question 130 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of 19 representations were received in relation to the Haworth portrait and Local Area Strategy (Question 130) from 18 respondents. Respondents included, Highways England, Historic England, a Ward Councillor and local residents. **Table 91.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 91.2**.

Table 91.1: Consultation Question 130: Haworth Portrait & Local Area Strategy- Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
130	Haworth Portrait & Local Area Strategy	19	18	16	1	2
	Totals	**19**	**18**	**16**	**1**	**2**

Table 91.2: Haworth Portrait & Local Area Strategy - Summary of Representations Received

Haworth Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
130	Haworth Portrait & Local Area Strategy	19	18	16	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Housing • Impact on local infrastructure/services • Impact on Drainage/Flooding • Local Area Strategy • Loss of Green Fields/Impact on Green Belt • Impact on Roads/Traffic • Impact on Tourism • Design and impact on character of Haworth • General Principle • Impact on Environment • Local Area Strategy • Impact on highway network • Consultation Process	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy HA1: Haworth & Cross Roads, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. Development of Housing: • New houses are required but those being developed are not meeting the needs of locals due to the high prices and not being affordable. • Affordable housing is required for local people • Building 204 new houses will damage local business, traffic and the community and effect tourism. • Disused mills should be converted / demolished (if they are not listed of course) and used for housing – do not build on greenfield sites. • The local authority should demonstrate all other reasonable options for meeting development needs. • The more houses built the more houses are needed in the future. E.g. in the 1950s the average family was a mother, father and 2.4 children, meaning that for every 8 houses built a ninth was required. Today the average family is larger than in the 50s.
2. Impact on local infrastructure/services: • The plan does not include extra services to the village to support the additional homes e.g. schools, doctors, road links, public transport, water, sewerage, electricity, internet etc. • Haworth Surgery is already oversubscribed. • There is no local fire service for Haworth. • Local GP Surgery covers other nearby settlements – more people in the area will add to waiting times for GP's. • There is not enough infrastructure in place to accommodate the suggested plan – schools and parks for children. The proposed 204 houses equates to potentially another 408+ children.
3. Impact on Drainage/Flooding: • Water courses and drainage have not been dredged or upgraded for decades, creating issues with standing water. • Building houses with drives reduces areas of land to soak up water. • Risk of adding to the flood risk in the bottom of Haworth by removing yet more green spaces where water can be absorbed.
4. Local Area Strategy

- Local Area strategy does not reflect all 3 villages- Haworth, Stanbury and Cross Roads.
- Has the Skipton Properties development been counted against this number of houses required?
- There is nothing in the Plan to protect historic physical or natural features, to promote a clean environment and reduce air and noise pollution, to promote tourism, to protect boundaries and green spaces between villages, to maintain and provide infrastructure for local residents, to maintain a positive environment or improve natural habitats and nothing to decrease traffic flow.
- Cross Roads is misspelt as one word.
- Why is Cross Roads included as part of Haworth?
- The plan states there are two schools in Haworth and two parks. This is not true. Lees Primary is in the village of Lees, which you call Cross Roads. Cross Roads park is a mile away from Haworth.

5. Loss of Green Fields/Impact on Green Belt:

- Importance of green space/access to countryside for physical and mental well-being. Eroding Green Belt impacts on available green space. Concern about the loss of green field sites as the feeling of space improves the wellbeing of nearby residents.
- I very strongly oppose the building of 204 houses in Haworth and Cross Roads, particularly on greenfield land.
- Building on Green Belt land is in contravention to the Government's aims and objectives. The fundamental aim of the Government's Green Belt policy is to prevent urban sprawl by keeping land permanently open (as per chapter 13 of the NPPF).
- As a council you are promoting green spaces and ecology and the environmental concerns yet include proposals to develop greenfield sites representing a blatant U-turn on supposed policy.
- Land that is adequate for farming should be encouraged to be used and protected for future generations rather than for residential developments.
- Previous planning application refused on Green Belt grounds. Plan includes 115 homes to be built on Green Belt in the Worth Valley.
- Local authorities should maximise the use of suitable brownfield sites before considering changes to Green Belt boundaries.
- NPPF requires 'exceptional circumstances' before changing Green Belt. What has changed to allow the release of green belt land?
- No sufficient justification providing exceptional circumstances.
- Local authorities must identify housing need for each settlement –this has not been explored sufficiently to justify building on green belt in Haworth/Oakworth/Oxenhope.

6. Impact on Roads/Traffic:

- Building more homes off Lees lane will increase the traffic on this already heavily used road, which causes safety concerns as there are no traffic calming measures.
- Large increases in traffic cannot be accommodated on narrow roads.
- Access at Cryer Meadows is regularly closed to residents due to maintenance of the pumping station and means new residents would find that access regularly closed thus meaning that Midgley Drive could then only be used.
- Parking - enough cars have to park on main roads causing obstruction! The proposed 204 houses equates to potentially another 408+ cars.
- Building anywhere in the Worth Valley increases traffic flows through these settlements with Lees and Cross Roads adversely affected as vehicles attempt to get to Keighley or Bradford on the road network which is all linked. Traffic issues are causing untold problems for residents.
- Congestion

7. Impact on Tourism:

- Haworth is the jewel in Bradford's crown. Tourists do not come from across the world (esp. Japanese) to see housing estates. they expect open fields and dry stone walls.
- Haworth is a tourist destination that has been significantly changed over decades. It's now perilously close to losing what makes it special and what attracts visitors to the area.
- The Council should protect green spaces, focus on subtle developments that are in keeping with the historic nature of the village and invest in local tourism focussed infrastructure to helping to help make Haworth a powerhouse to drive the local economy.

8. Design and impact on character of Haworth:

- Previous new builds, stand at the junction of Cryer Meadows and Lees Lane and you will find three styles of walling never before seen in Haworth. Long Acres estate has the ugliest walls imaginable.
- Vale Mill Lane has been changed with a massive, raised level of land so much so that the houses stand on concrete rafts.
- large concrete slabs supporting Cryer Meadows, the housing looks like army barracks.
- Object to the style of build PLUS altering the land levels.

9. General Principle:

- The world's population is growing – 4 billion (1970s), nearly 8 billion today, meaning in another 50 years it will be 16 billion – the planet cannot sustain this. Should be looking bringing down the birth-rate rather than building.

10. Impact on Environment:

- The proposals will adversely impact the environment and air quality.

Support

1. Local Area Strategy

- Support for a key element of the Local Area Strategy for Haworth which includes that development should: Conserve and enhance the designated and undesignated heritage of Haworth especially those elements which make a significant contribution to the distinct character of this area and the buildings and landscapes associated with the Brontes.

Comments

1. Impact on highway network:

- Development in Haworth would not on its own have a severe impact on the Strategic Road Network.
- It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

2. Consultation Process

- Consultation held during Covid19 lockdown means people are disenfranchised from the process due to not having online access or skills. Face to Face consultation sessions should have been conducted.

Representation IDs: 33, 44, 242, 777, 1016, 1020, 1561, 1870, 3729, 6327, 6795, 6919 ,7129, 15519 ,15750, 18229, 18233, 29108, 29540

Sites

As highlighted above, six sites were put forward in the Preferred Options document to meet the proposed development requirements for Haworth (all 6 for residential). Under Q131 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of 73 representations were received in relation to Sites HA1/H to HA6/H from 69 respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents and a Ward Councillor. **Table 91.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 91.4**.

Table 91.3: Haworth Proposed Sites (HA1/H to HA6/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HA1/H: Worstead Road, Cross Roads	14	13	12	0	2
HA2/H: Lees Lane, Cross Roads	19	18	17	0	2
HA3/H: Lees Lane, Cross Roads	22	21	21	0	1
HA4/H: Ebor Mill, Ebor Lane	7	6	4	0	3
HA5/H: Ashlar Close	3	3	2	0	1
HA6/H: Ivy Bank Lane	8	8	5	1	2
Totals	**73**	**69**	**61**	**1**	**11**

Table 91.4: Summary of Representations Received – Haworth Proposed Sites (HA1/H to HA6/H)

HA1/H: Worstead Road, Cross Roads

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HA1/H: Worstead Road, Cross Roads	14	13	12	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on surrounding area/community: • Impact on tourism • Impact on local infrastructure/services: • Impact on local highway network: • Proposed site access: • Parking: • Green space: • Development of Green Belt / greenfield land: • Agricultural land: • Brownfield land: • Empty properties • Affordable housing: • Housing types: • Suitability of the site: • Impact on wider environment and biodiversity: • Air quality • Flood risk and drainage: • Typographical errors / grouping of settlements:	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H338) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

• Flood risk/drainage:	

Summary of Representations
Objections:
1. Impact on surrounding area/community: • Development would impact businesses, result in constant noise, restrict daylight of adjacent properties and remove adjacent trees. • Properties on Myrtle View will be impacted by noise, loss of property value.
2. Impact on tourism • Development of the site will have an adverse impact on tourism.
3. Impact on local infrastructure/services: • Impact on schools, doctors, utility infrastructure, playgrounds, local roads. • The site is not near any shops/facilities.
4. Impact on local highway network: • More housing will result in more cars, commuting and air pollution. Insufficient facilities in Cross Roads meaning more car trips.
5. Proposed site access: • Proposed access to the site off major road (Halifax Road) is already very congested. Impacts on health and quality of life.
6. Parking: • Worstead Road was given to the Council to provide parking for local residents - how will the new development affect this? Have parking issues been considered?
7. Green space: • Green spaces are good for mental health and should be protected not built on.
8. Development of Green Belt / greenfield land: • The site is Green Belt/Pasture.

- Greenfield site and development would need to be carefully designed to ensure adequate screening and green spaces.

9. Agricultural land:

- For farming to continue in the area, fields like this should be protected.

10. Brownfield land:

- Brownfield sites should be used first.

11. Empty properties

- Consideration should be given to empty properties and missing landlords.

12. Affordable housing:

- No need for more unaffordable housing estates. People that need homes can't afford these properties.

13. Housing types:

- The kind of housing needed is for older people and young families. Accessing services will require people to cross Halifax Road (which has no crossing).

14. Suitability of the site:

- The site is unsuitable for housing development and will overcrowd the village.
- There is a railway tunnel under the site, which may constrain development.

15. Impact on wider environment and biodiversity:

- Development of the site will impact on biodiversity. The site supports a large amount of wildlife.

16. Air quality

- Development will impact on air quality and environment.

17. Flood risk and drainage:

- The field is usually boggy and development will cause further flooding. This needs to be rectified. Drainage issues need to be dealt with.

18. Typographical errors / grouping of settlements:

• Cross Roads is misspelt and lumped in with Haworth - it is a separate village as is Lees.
Support:
No representations received in support
Comments:
1. Flood risk/drainage: • The site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 1102, 1542, 1568, 1598, 3276, 3595 ,3732, 5973, 6028, 7159, 15751, 18234, 28691, 29627

HA2/H: Lees Lane, Cross Roads

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HA2/H: Lees Lane, Cross Roads	19	18	17	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on surrounding area and local residents: • Impact on tourism • Impact on local infrastructure: • Impact on the local highway network: • Proposed site access • Impact on the wider environment and biodiversity: • Green space • Development of greenfield/Green Belt land: • Merging of settlement • Brownfield land: • Empty properties • Affordable housing • Flooding/drainage • Land stability • Design • Heritage assets • Site boundary • Typographical errors / grouping of settlements: • Flooding/drainage:	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H339) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Impact on surrounding area and local residents: • Existing houses will be overlooked causing a loss of privacy, loss of light / overshadowing.
2. Impact on tourism • Haworth is a tourist attraction and should remain so. It should not be built up with new houses.
3. Impact on local infrastructure: • Impact on local services e.g. schools, roads, doctors.
4. Impact on the local highway network: • Concern regarding the level of traffic through Cryer Meadows/Midgley Drive - causing noise and impacting on air quality/pollution and safety of children. • The roads are busier and congestion is worse and cannot cope with increased volume of traffic. Increase risk/danger to pedestrians including children walking to school.
5. Proposed site access • There needs to be direct access off Lees Lane. Access via Cryer Meadows is not viable due to water pumping station.
6. Impact on the wider environment and biodiversity: • Designated TPO trees would be affected by the development. • Impact on local wildlife e.g. deer, pheasant, foxes, badgers, ducks, butterflies, hedgehogs
7. Green space • Concern regarding loss of green space and impact on established green trees. • Site is allocated village greenspace and should be protect as such.
8. Development of greenfield/Green Belt land:

• Site is green belt / pasture
9. Merging of settlement • Development will cause Haworth to merge with Cross Roads and will result in overdevelopment.
10. Brownfield land: • Brownfield sites should be used e.g. Ivy Bank.
11. Empty properties • Consideration should be given to empty properties and missing landlords. • Keighley town centre has a lot of empty buildings which could be used instead.
12. Affordable housing • Consideration should be given to building social housing or sheltered/wardened flats, bungalows etc
13. Flooding/drainage • The adjacent development had issues with water/sewerage which required additional work. This would need to be addressed up front with this site. • Proposed building on flood zone 1. • Risk of flooding from redirection of underground streams/ surface water.
14. Land stability • Previous problems of underground pipes, erosion of sandstone, risk of further movement.
15. Design • Land levels have been altered over the years with all the new development. The walls and style of housing is ugly.
16. Heritage assets • Site is in close proximity to the Grade II listed Ebor Mills site. Reference should be made to the potential impacts on this heritage asset and development should look to mitigate any potential harm to its significance.
17. Site boundary

- Check boundaries of the site.

18. Typographical errors / grouping of settlements:

- Cross Roads is misspelt and lumped in with Haworth - it is a separate village as is Lees.

Support:

No representations received in support

Comments:

1. Flooding/drainage:

- Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 737, 742 ,746 ,1023, 1484, 1563, 2970 ,5977, 6045, 6323, 7160, 8014, 8193, 15752, 16507,18235, 27985, 28692, 29431

HA3/H: Lees Lane, Cross Roads

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HA3/H: Lees Lane, Cross Roads	22	21	21	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on surrounding area and local residents: • Impact on tourism: • Impact on local infrastructure: • Impact on the local highway network: • Proposed site access: • Impact on the wider environment and biodiversity: • Green space: • Development of greenfield/Green Belt land: • Merging of settlement • Brownfield land: • Empty properties • Affordable housing • Flooding/drainage • Design • Heritage assets • Site boundary • Typographical errors / grouping of settlements:	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H340) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Objections:
1. Impact on surrounding area and local residents: • Existing housing will be overlooked with a loss of privacy, loss light and overshadowing.
2. Impact on tourism: • Haworth is a tourist attraction and should remain so. It should not be built up with new houses.
3. Impact on local infrastructure: • Cryer Meadows pumping station requires regular maintenance which would affect access to the site. Ability of water pumping station to cope with additional properties. • Impact on capacity of local schools, amenities, GPs etc through increase in residents.
4. Impact on the local highway network: • Parking issues in the village.
5. Proposed site access: • The access to the site off Midgley Drive isn't adequate. The road is too narrow. Concern about the level of traffic being generated through Cyer Meadows/Midgley Drive. Safety concerns for children. Noise and air quality/air pollution issues. Impact of increased traffic through the village.
6. Impact on the wider environment and biodiversity: • Impact on local wildlife - deer, pheasant, fox, badger, birds etc
7. Green space: • Concern about the loss of green space and the impact to the established group of trees (TPOs) in this site.
8. Development of greenfield/Green Belt land: • Greenfield sites should not be developed.
9. Merging of settlement • Haworth will be connected up to Cross Roads if this development goes ahead. This area is an important barrier between Lees and Cross Roads.

10. Brownfield land:

- Brownfield sites should be used first. Brownfield sites including abandoned buildings, unused warehousing should be used before Green Belt land.

11. Empty properties

- Housing that is unoccupied by missing landlords should be compulsory purchased.
- Keighley town centre has a lot of empty buildings which could be used instead.

12. Affordable housing

- No social housing to be provided.
- Consideration should be given to building social housing or sheltered/wardened flats, bungalows etc

13. Flooding/drainage

- Adequate and sufficient drainage would need to be installed to prevent flooding of existing properties. Development will cause runoff and flooding lower down the village.

14. Design

- Land levels have been altered over the years with all the new development. The walls and style of housing is ugly.

15. Heritage assets

- Site is in close proximity to the Grade II listed Ebor Mills site. Reference should be made to the potential impacts on this heritage asset and development should look to mitigate any potential harm to its significance.

16. Site boundary

- Check boundaries of the site.

17. Typographical errors / grouping of settlements:

- Cross Roads is misspelt and lumped in with Haworth - it is a separate village as is Lees.

Support:

No representations received in support

Comments:

1. **Flooding/drainage:**
    - Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 736, 738, 743 ,745, 778, 926, 1735, 2971, 4185, 4189, 5981, 6046, 6324, 7161, 8015, 8194, 15753, 16508, 18236, 27986, 28693, 29433

HA4/H: Ebor Mills, Ebor Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HA4/H: Ebor Mill, Ebor Lane	7	6	4	0	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt • Local infrastructure/services • Local road network • Impact on the environment • Housing mix • Heritage asset • Mill redevelopment • Wording error • Planning permission • Flood risk	Since the consultation on the Regulation 18 Local Plan was undertaken, this site has now been developed out and is in residential/other use and is therefore no longer allocated in the Plan

Summary of Representations
Objections:
1. Development of Green Belt • Object to use of green belt sites • Brownfield sites should be used first.

2. Local services and infrastructure

- Infrastructure needs to be considered – roads, doctors, schools, sewers, increased traffic.

3. Local road network

- Roads already congested

4. Impact on the environment

- Impact on air quality

5. Housing mix

- Consideration should be given to sheltered housing

6. Heritage asset

- Site consists of the Grade II Listed Ebor Mill. Any development of this site should retain and sensitively convert the mill buildings and structures of interest. In addition, adjacent the bridge across the Bridgehouse Beck and 4-8 Ebor Lane are also Grade II Listed. Development could harm elements which contribute to the significance of this designated heritage asset. See attachment for full representation

  Before allocating this site for development:

  (1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.

  (2) If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.

  (3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).

Support:

1. : Mill redevelopment

- .Do not object to the redevelopment of the mill

Comments:
1. :Wording error • Cross Roads mis-spelt
2. Planning permission • Planning permission granted on site and work has started
3. Flood risk • Flood zones 2 and 3 and small part of draft 3b in the site boundary. Post development discharge rates should be restricted to the pre development rate. Mitigation will be required including raised floor levels and area for compensatory storage. Consideration should be given to making space for water and manage flood risk where possible

Representation IDs: 7163, 15754, 16506, 18237, 28694, 29280, 29436

HA5/H: Ashlar Close

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HA5/H: Ashlar Close	3	3	2	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Brownfield land and empty properties: • Impact on local infrastructure: • Affordable housing: • Proposed site access: • Flood risk/drainage:	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H341) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Brownfield land and empty properties: • Brownfield sites including abandoned buildings, unused warehousing should be used before Green Belt land. Housing that is unoccupied by missing landlords should be compulsory purchased.
2. Impact on local infrastructure: • Consideration is never given to infrastructure, roads, doctors, schools, sewage, increased traffic.
3. Affordable housing: • None of these dwellings will be social housing.

4. Proposed site access: • Not clear where the access for the site is from (Cliff Street or Hebden Road). Neither provide easy access - Cliff Street is steep and can be narrowed by parked vehicles. Hebden Road is busy with difficult sight lines.
Support:
No representations received in support
Comments:
1. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 7164, 18238, 28696

HA6/H: Ivy Bank Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
HA6/H: Ivy Bank Lane	8	8	5	1	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Road safety • Flood risk • Heritage impact • Impact on habitats • Support redevelopment of the site • Site access • Planning application	Since the consultation on the Regulation 18 Local Plan was undertaken, this site has now been developed out and is in residential/other use and is therefore no longer allocated in the Plan.

Summary of Representations
Objections:
1. Road safety • Inadequate roads, steep and hazardous in winter
2. Flood risk • Flood zone 2 – development will add to flooding in the lower part in the area
3. Heritage • Impact on Conservation Area

4. Impact on habitats • Bats roosting in Ivy Bank Mill
5. Site access • Traffic access onto Bridgehouse Lane is adding to the already bust through traffic.
Support:
1. Redevelopment of the site • Site in a bad state since fire at the old mill. A sympathetic redevelopment scheme would improve the area. • Site Access – pointed out that mill wagons and lorries used to use it years ago.
Comments:
1. Planning Application • Planning application ongoing since 2018 with the main issue being access into the site. • Ivy Bank Lane is unadopted single track
2. Heritage concerns • Site is within the Haworth Conservation Area – any development would have to be carefully designed. • Site runs alongside the KWVR railway so any impact on the visual amenity would need special consideration.

Representation IDs: 43, 1734, 5986, 6122, 7166, 18240, 28697, 29438

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 131 within the consultation document.

Summary of Consultation

A total of 10 representations were received in relation to Question 131 from 10 respondents. Respondents included Highways England, local residents, A survey company, a design company and estate management company.. **Table 91.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 91.6**.

Table 91.5: Overview of Representations Received - Q131: Haworth Preferred Site Allocations

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q131	10	10	9	0	1

Table 91.6: Consultation Question 131: Haworth Preferred Site Allocations - Summary of Representations Received

Haworth Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Flood Risk: • Green Belt Issues: • Site Omissions: • Development should not go ahead. • Locational Strategy • Impact on highway network:	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy HA1: Haworth, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

Summary of Representations
Objections
1. Flood Risk: • Proposing developments which pave over more of the side of a steep valley will increase flood risk on Mill Hey. The plan should consider existing homes. •
2. Green Belt Issues: • Building on Green Belt land is in contravention to the Government's aims and objectives including preventing urban sprawl and keeping land permanently open as set out in the NPPF which states the importance of Green Belt. • NPPF emphasises that when protecting the Green Belt, local authorities should maximise the use of suitable brownfield sites before considering changes to Green Belt boundaries. • The Green Belt is drawn too tight to the existing houses with no space for future expansion.
3. Site Omissions: • Brow Rd Haworth (Bridgehouse Farm) should be added to the Preferred Housing Site Allocations for Haworth. The land should also be released from the Green Belt to allow its development for housing site under Policy SP5 because: the site is almost totally enclosed by other housing development, would be minimal encroachment into the open countryside, would be a logical location for further housing growth and development would result in a sensible "rounding off" of the Green Belt boundary. There are no particular features of interest in the landscape on the site and views of it are limited. From those locations where the site can be seen it would be viewed as a sensible infill between other built development and would not cause any harm to the landscape character of the wider open countryside. The location is sustainable, close to shops services and transport. An access could be made to Brow Road and the landowner supports development. There are no known obstacles to development. • Include HA/026 as an allocation because the site adjoins existing housing and would involve an acceptable level of encroachment into the countryside resulting in a straighter edge to the Green Belt. The site would be viewed as a sensible infill or extension and would not harm landscape character. The site is in a sustainable location with a number of possible access points. The site is in easy reach

Summary of Representations
of local shops, services and public transport. Development would further sustain the provision of those facilities. The landowner is supportive of development. • Include part of HA/006 as a preferred site. The bottom section of the site can be retained as Green Belt to reinforce the landscape setting of the River Worth, which forms the boundary between Oakworth and Haworth. This would form a roughly equal area of land to both sides of the river to separate the settlement areas. The land has two access points and is within 400M of a bus stop. • Include HA/013. An increase to the requirement and amendments to the distribution would allow housing to be provided in sustainable locations across Bradford, providing choice and flexibility. Green Belt release should be considered in other settlements. In order to retain flexibility over the plan period and to respond to potential housing land supply shortfalls over the plan period, we consider that there are Green Belt sites which should be considered that perform poorly against the five purposes of Green Belt. Sites should be considered for release where the green belt function is weak and that are in sustainable locations with access to transport and amenities. Haworth is a sustainable location for housing growth with a good level of facilities and also has excellent accessibility by public transport to other destinations in West Yorkshire. It is therefore clear that to meet the housing need in Haworth, new housing allocations are required. • Objection to the rejection of site HA/011. What is the reason behind why it is omitted for future possible housing on the Draft Local Plan, (DLP). Originally shown in the Shlaa 3 (2015) as being in the Trajectory albeit with LA Policy Constraints – what has changed? If it cannot be built on, then why was it originally allocated for future housing in the Shlaa? The land East off Ivy Bank Lane also allocated on the Shlaa (2015) has been given Planning Permission for Housing?
4. Development should not go ahead.
5. Locational Strategy • Stop referring to HA1/H: HA2/H: HA3/H and HA4/H as being in Haworth. HA1/H Worsted Way is located in Bocking, HA2/H: HA3/H and HA4/H is in Lees. Lees, Cross Roads and Bocking are all individual settlements clearly defined by boundaries with different issues to Haworth.
Support
No representations in support
Comments
1. Impact on highway network: • Development in Haworth would not on its own have a severe impact on the Strategic Road Network.

Summary of Representations
• It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

Representation IDs: 27 ,1017 ,1348, 1569, 1631, 6113, 7130, 15520, 25312, 30027

2.92 OAKWORTH

Introduction

The Local Plan settlement hierarchy identifies Oakworth as a Local Service Centre. This means that it will see a smaller scale of development, comprising both market and affordable housing, as well as the protection of its local centre to help ensure the continued provision of economic activity in the area. The settlement has target of 75 dwellings. The evaluated total site supply of housing units from the preferred allocation sites equate to 95 units, which is in turn discounted by 10% for non-implementation or under delivery, leaving a final allocation contribution of 85 units. A total of two site allocations were proposed to deliver these development requirements.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Oakworth's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as question 132 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of 53 representations were received in relation to the Oakworth portrait and Local Area Strategy (Question 132) from 51 respondents. Respondents included, Highways England, local residents and a Ward Councillor. **Table 92.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 92.2**.

Table 92.1: Consultation Question 132: Oakworth Portrait & Local Area Strategy - Overview of Representations Received

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
132	Oakworth Portrait & Local Area Strategy	53	51	51	0	2
	Totals	**53**	**51**	**51**	**0**	**2**

Table 92.2: Summary of Representations Received - Oakworth Portrait & Local Area Strategy

Oakworth Portrait & Local Area Strategy

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land: • Impact on local infrastructure/services: • Impact on character and community: • Highways • Impact on heritage and open space: • Green Space • Access • Impact on ecology / biodiversity and trees: • Alternative sites • Flood risk • Health • Design • Housing supply • Public Transport • Evidence • Crime • General comments • Consultation • Transport	The Council has reviewed the multiple representations made on the Oakworth Portrait & Local Area Strategy and they have been considered in the justification and drafting to the new Policy OA1: Oakworth, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections
1. Development on Green Belt land: • Objection to the development of more houses in Green Belt. • Destroying Green Belt • Brownfield sites should be built on first. • Development destructive to Green Belt • Already been a loss of Green Belt concerns if this continues. • No justification for exceptional circumstances. • Green Belt development against government aims.
2. Impact on local infrastructure/services: • Oakworth is already busy and overcrowded. • No room at school, no room at Haworth school and no room to extend. • Poor road quality and layout, increased traffic. Secondary school choice poor. • GP surgery currently has no GPs and may be closing. • No dentists • Cannot sustain more houses without improving infrastructure. • Water and gas facilities outdated • Sewers and drains cannot cope • Nothing to improve local infrastructure.
3. Impact on character and community: • Children need the fields and green space. • Development would join Haworth and Oakworth • Oakworth is already overdeveloped

- Developments spoiling village landscape

4. Highways

- Accident blackspot on roads due to parking and speed used through village.
- Traffic is at a dangerous level.
- Parking is an issue especially near the school.
- Roads are old and not adequate for traffic volume.
- vehicles parking along the roads and on pavements, causing problems for through traffic, disabled and pram and pushchair users.
- Cycling is not supported by residents of a hilly location.
- Additional development will increase traffic on roads already overused.
- Issues with road safety and speeding.
- There is a disregard of 20mph speed limits.
- Concerns over congestion.
- Nothing to decrease traffic flow.
- Lack of street parking.

5. Impact on heritage and open space:

- Views from current houses need protecting.
- It is a rural village that will be spoilt by development.
- Nothing to improve tourism and tourism will be impacted by development

6. Green Space

- Will lose green space
- Green space needs protecting
- proposed development would remove last greenfields from Keighley to Oakworth village centre.
- Need green space for health.
- Nothing to protect green spaces between villages

7. Access

- Victoria Road is narrow, concerns over access through field. Maple Avenue is also too narrow to have a flow traffic coming through.
- Issues with site access
- Major road works will be needed to gain access to new development on Sykes Lane as it is a sloping access.
- Bin lorries and emergency services struggle to access properties due to parking nearby.
- Half of children's play area will be taken for site access
- If the houses are built on Sykes Lane OA2/H this will make a road through from Sykes Lane to Station Road, Planning permission was turned down a few years ago because of this.
- Access near a play area is dangerous
- The access suggestions for OA2/H present further difficulties and potential safety concerns at both points. Potential traffic safety concerns leading onto main Keighley/Oakworth Road but worse still an emergency access suggestion via Victoria Road already difficult to negotiate as both a driver or pedestrian.

8. Impact on ecology / biodiversity and trees:

- Wildlife in the fields
- Is a green belt area for a reason, deer and owls in this area which forms part of an essential green corridor. It will cease to be a corridor.
- OA1/H wildlife and environmental concerns. Site is a wildlife corridor.
- Impact on bat, deer and owl population.

9. Alternative sites

- If expansion then on brownfield sites: by Providence Mill Chimney or car parks below Oakworth Station and lots of screening with trees.
- There are other sites in Keighley where socio-economic mix is much worse
- redevelop existing sites with better transport links
- conversion of mill sites would make better use of land
- Keighley would benefit from further investment

10. Flood risk

- recent developments there has been a greater amount of standing water and a pipe has been fractured causing Sykes Lane to collapse.
- The Sykes Lane site is unsuitable. It is on a different level to the road, is in an area with natural springs.
- Issues with drainage.
- Area named Bogthorn and Sykes Lane (old English stream). Pond in field, water table, springline disturbed by new building.

- Existing houses on Keighley Rd and Valley View have experienced flooded gardens, cellars.
- Burst water pipes

11. Health

- Traffic levels on Providence Lane is already impacting Asthma sufferers. Any extra housing here will only worsen this pollution.
- Loss of open space - open spaces improves mental well-being
- Further development would be detrimental to quality of life
- Impact on air quality
- Congestion causes air pollution and health concerns
- Nothing to reduce air and noise pollution

12. Design

- Oakworth is overdeveloped. Little respect for the original architecture.

13. Housing supply

- Unnecessary development for Oakworth when current housing stock is not selling
- Lack of demand
- Housing under occupied
- Population is growing need to address this

14. Public Transport

- Not sufficient public transport leads to over reliance on cars already. It will get worse.
- Poor public transport
- No vision to increase passenger capacity contravention to Government's Decarbonising Transport strategic priority.

15. Evidence

- The evidence that the village needs a further 95 dwellings is unclear.
- No evidence demonstrating need for further houses
- No exceptional circumstances for developing in Green Belt.

16. Crime

- Will lead to increase in anti-social behaviour

17. General comments

- Sites unsuitable

Support
No comments in support
Comments
1. Consultation • Extension should have been granted for those who do not have online access
2. Transport • Development within Oakworth will not have a severe impact. This will be identified through transport evidence base. • Cumulative impact of development within the whole plan will need to be considered as could impact SRN.

Representation IDs: 26, 30, 37, 39, 50, 65, 183, 243, 246, 253, 325, 483, 644, 691, 715, 1130, 1140, 1264, 1520 ,1523 ,1528, 1550, 1634, 1638, 1805, 2020 ,2057, 2058 ,2062, 2091, 2135, 2177, 2272, 2460, 2612, 2656, 3077, 3110, 3112, 3800, 4098, 4397, 5043, 6796, 6921, 7128, 7556, 10065, 10489, 15521, 18230, 18241, 28259

Sites

92.1 As highlighted above, two sites were put forward in the Preferred Options document to meet the proposed development requirements for Oakworth (both for residential). Under Q133 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

92.2 A total of **258** representations were received in relation to Sites OA1/H to OA2/H from **251** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents and a Ward Councillor. **Table 92.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 92.4**.

Table 92.3: Oakworth Proposed Sites (OA1/H to OA2/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
OA1/H: Pasture Avenue	121	119	119	1	1
OA2/H: Keighley Road, Sykes Lane	137	132	133	1	3
Totals	**258**	**251**	**252**	**2**	**4**

Table 92.4: Oakworth Proposed Sites (OA1/H to OA2/H) - Summary of Representations Received

OA1/H: Pasture Avenue

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
OA1/H: Pasture Avenue	121	119	119	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on surrounding area/community • Impact on local infrastructure/services • Impact on local highway network • Proposed site access point • Development of Green Belt / greenfield land • Alternative proposals • Impact on ecology / biodiversity and trees • Impact on open green space • Impact on heritage • Impact on landscape • Flood risk and drainage • Increase in pollution • Impact on public rights of way • Impact on village character • Impact of encroachment • Use of brownfield land • Proposed level of housing growth in Oakworth	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H818) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

• Provision of affordable housing and housing need Planning policy conflicts and constraints Sustainable development and general objections Employment	

Summary of Representations
Objections:
1. Impact on surrounding area/community: • Safety implications on the roads and increased pollution.
2. **Impact on local infrastructure/services:** • Dentist is at capacity and cannot support further residents. • The doctor's surgery is closed and patients have to go elsewhere. (Already difficult to get an appointment at the surgery in Haworth). • No infrastructure to support more housing. Pressure on services from new development. Local amenities cannot cope with additional housing. • The school is already at capacity. Insufficient school places. Pressure on local secondary school places. No space around the primary school to expand. • Extra load on failing infrastructure, water mains (inadequate water supply), electricity supply. Already have power outages • The drainage infrastructure is not sufficient for further development. Existing sewerage system is already overloaded. • strain on local amenities • Public services are inadequate • There is no dentist in Oakworth • Impact on psychological health should not be underestimated with overcrowding in public areas/roads/schools/shops. • Public transport links would be more accessible in urban areas making those areas more desirable for working people and families and reducing the reliance on cars. • Inadequate proposals have been presented with regards to upgrading local infrastructure to cope with proposed extra housing and extra pressures on local services.
3. Impact on local highway network:

- The road infrastructure is not sufficient for further development. Development will cause increased pressure on local roads, with increased traffic flow through the village.
- New development would create additional traffic and noise. It will make Pasture Avenue too busy for children to play out on the street. Safety issues for children and elderly. The street would not cope with extra traffic. Construction traffic will compromise safety.
- Development would add extra pressure to the main road. The estate roads are too narrow.
- Oakworth has reached saturation point in terms of traffic.
- Pasture Avenue is already a busy road with cars double parked.
- There is congestion (especially near school and shops) in the village already without the addition of two more large estates. Making it difficult to park to access amenities. Lack of parking for the school and coop. Development will result in increased congestion.
- Not many jobs in the village, leading to increased road congestion and carbon footprint.
- Pasture Avenue is not fit for heavy plant vehicles.
- Heavy traffic and congestion through the village already
- concerns over volume of traffic
- Construction traffic will struggle to pass all the parked cars on Pasture Ave.
- Visibility concerns from site due to parked cars near entrance
- Safety concerns due to heavy traffic
- Village has limited/no parking around the school and CO-OP adding to congestion and accidents.
- Pavements are dangerous
- Only one car park, on street parking a necessity
- Blocking pavements creates problems for blind/partially sighted and parents with buggies. Route to Oakworth Primary school is challenging, an obstacle course, even dangerous.
- The level stretch of Oakworth Road is like a race track.
- Access to OA2/H on Victoria Road is double parked making it single track
- Building will be visible from roads, walking routes and KWV Railway and would contribute to sprawl, destroying the nature of the village itself.
- Line of vision leaving OA1/H is difficult. Adding more vehicles would be dangerous.
- Large housing complex built on Bronze Fields and another being built on Ebor Lane will cause major traffic issues getting out the village. Further housing will only add to this.
- dangerous at entrance to Victoria Avenue next to school and shops, cars park at both sides of the road.
- The main road drainage has frequently been overwhelmed by muddy run-off which occurs with only little more than average rainfall. It is dangerous.

- Roads too narrow

4. **Proposed site access point:**

- The junction of Pasture Avenue and Providence Lane can be dangerous with vehicles travelling too fast making it difficult to turn on to Providence Lane.
- Access is inadequate.
- Access should be provided from Providence Lane
- The proposed access point is not wide enough and would take away the communal grounds that residents use. Limiting children's access to open space.
- Proposed access to site is next to a children's play area causing safety concerns.
- Site access dangerous
- No access for emergency vehicles
- Access to OA2/H – bus stop located where access would be. Moving it would be difficult due to junction with Slaymaker Lane and cause more parking issues.
- Access – Sykes Lane emergency entrance would be via Victoria Road which is next to school and dangerous/busy with cars parked both sides and would compound access to main Colne Road
- Access – main road onto Keighley Road blind access and dangerous, very busy
- Sykes Lane access onto Keighley Road dangerous
- Exit from Pasture Avenue site would be dangerous as unable to see over the brow up the hill.

5. **Development of Green Belt / greenfield land:**

- Green belt fields should not be built on.
- The case made for a positive impact are weak and do not consider the specific circumstances of the site.
- Green belt can only be developed in exceptional circumstances can the council demonstrate this and fully explored all brownfield sites.
- Looks like an attempt to build on green belt land in the interest of profit.
- Greenfield site should be preserved.
- Green Belt use detrimental to village character
- Failure to demonstrate exceptional circumstances
- Against Government objectives
- Children benefit from the green belt sites, this will impact on their out door space which they use.
- A Green Belt field has already been developed with a caravan without planning permission or enforcement.

- Council has no regard for the importance of Green Belt.
- The site it is a boggish piece of greenfield which borders a conservation site and the boundary to the greenbelt. Within it are regular herds of deer amongst other types of fauna and flora. Above the land are a substantial number of homes built including Highoak Garth.
- Object to houses being built on greenfield or Green Belt sites when all options for new housing on inner town/city areas haven't been exhausted. Change plans to explore all brownfield options first.
- No justification for the proposed housing numbers identified to warrant removal of areas of Green Belt.

6. Alternative proposals:

- There is an alternative site north of Moor Drive in Oakworth which should be used instead.
- more suitable sites that can better cope with the extra demands placed upon it should be developed first.
- Develop existing unused buildings e.g. vacant mills and similar properties.
- more suitable sites that can better cope with the extra demands placed upon it developed first.
- Develop underused buildings and dilapidated mills. City sites that are closer to where the jobs are so the public transport is not stretched.
- Other sites which can guarantee access without any potential third party, visual issues are available.
- There is land and derelict property in the Keighley area that is ripe for development and would improve many of the parts of Keighley that are currently unattractive if thought and good planning were exercised
- Keighley town centre – lots of empty buildings. Could be converted to flats or dwellings. On the outskirts there are derelict areas that could be built on first without encroaching fields from the villages or building in more desirable areas.
- the proposed second phase at that site (KY9/H) would be much more appropriate than building at the sites proposed in Oakworth.
- There are alternatives including land which is not Green belt and which is close to public transport and new jobs – there is no demand for this in Oakworth.
- There are plenty of other spaces to build houses on which are not green belt.
- Continued vacancy and underuse of buildings/mills and sites, convert these across the city. They are better suited in terms of transport/amenities.

7. Impact on ecology / biodiversity and trees:

- There is wildlife on the site including deer, hedgehogs, bats, owls, mice, moles, voles, squirrels, newts, insects (bees, butterflies), birds, small animals. The development will have an impact on wildlife, local ecology and harm the environment. This is the only wild meadow left in this area. It is a sanctuary for animals. Deers raise their young in this field. One of the very few remaining wildlife

corridors. (Bats have returned and bat boxes have been put up. They are a protected species). Lizards are present in the drystone walls. This site should be preserved for wildlife.

- Development of the site will lead to the loss of trees.
- The area remains a natural meadow/reserve for wildlife needs protecting
- The area remains a natural meadow/reserve for wildlife
- Wildlife and environmental concerns
- depletion of natural habitats and wild life
- Neighbouring development is devastating natural habitat and should enforce green belt land as it's a major factor for future generations.
- OA1/H has developed into a wildlife haven
- Increase in animals causing problems on pavements (i.e. dog mess).
- Sites need to be protected areas of natural beauty.
- Pasture Avenue has a wildlife corridor

8. Impact on open green space:

- Loss of open space contradicts the government's priority for supporting children's development, social interaction, mental health and well-being.
- Continued removal of open spaces. Development at Bogthorn has removed a large green space. People of Oakworth enjoy walking and the greenspaces for their mental health and wellbeing. Building on greenspaces/green belt will have a detrimental impact.

9. Impact on heritage:

- Valuable site adjacent to the conservation area. Development will be detrimental to the character of the area.
- Impact on the Keighley and Worth Valley Heritage Railway.
- Development of this site will allow future development on the nearby greenfield and green belt land. The history of the village will become lost in a maze of new build development.
- protect the area so that future generations may enjoy the natural history and safety of the village.
- Adding population without infrastructure will lead to social unrest, bored children roaming the streets, crime and destruction of historic areas.
- Green Belt land is visible from the heritage railway – a big tourist attraction to the area. Buildings will damage the character of the area and lose its attraction to tourists.

10. Impact on landscape:

- Development would compromise the landscape and openness of the countryside in the heart of Bronte Country. Land provides unobstructed views across the valley.
- Sloping site prominent in the landscape with long distance views, the open area can be viewed from many aspects.
- This is the most beautiful of views and the value of this to people's wellbeing and mental health cannot be underestimated.
- The site adjoins the boundary of the Oakworth Conservation Area. The development of this area could harm elements which contribute to the significance of this designated heritage asset.

11. Flood risk and drainage:

- Village prone to bad flooding in heavy rain. Fields below the heritage path are often waterlogged in recent wet seasons. Runoff after house building would be far more excessive than now.
- Flooding from excess water from Slaymaker Lane
- Concerns over surface water flooding
- Impact on drains and sewers
- there would be a higher risk for flooding for those properties sited at the lower end of Sykes Lane if building on the OA2/H Keighley Road/Sykes Lane went ahead. This is already an issue during periods of heavy rain now.
- Site in Flood Zone 1 ONLY
- Mitigation should be set above the 1 in 100 plus cc level for the site as suitable for the proposed vulnerability
- classification (EA standing advice should cover this).
- Drainage run off from both sites would cause flooding lower down Cackleshaw, Station Road and Providence Lane
- During the development property was flooded due to incompetent ground works, which took no account of natural springs.

12. Increase in pollution:

- Increased traffic and development will cause pollution and increased CO_2 emissions.
- additional pollution and health concerns
- Noise levels will increased.

13. Impact on public rights of way:

- Heritage walk in the woodland below the site would be negatively impacted.
- Additional pressure on footpaths.

14. Impact on village character:

- Development of the site would lead to the erosion of the village community and cause destruction of the village character.
- Village identity lost as Oakworth/Haworth gradually merge.
- Developments at Sykes Lane and Pasture Avenue are an ill thought through attack on our natural habitat within an area already struggling with current infrastructure deficiencies.
- This village is known for its beautiful green space which you are proposing to completely ruin.
- House prices will reduce, views spoilt, ambience of village eroded.

15. Impact of encroachment:

- Communities slowly encroaching upon one another. Development would increase urban sprawl. Losing boundaries between villages.
- Village identity lost as Oakworth/Haworth gradually merge.

16. Use of brownfield land:

- Plenty of other more suitable sites are available in the area. Brownfield sites available which are more suitable. (e.g. Dalton Mills in Keighley).
- Other more suitable land is developed eg. brown field sites located closer to public transport links and jobs.
- Other more suitable land is developed eg. brown field sites located closer to public transport links and jobs.
- Develop existing unused buildings e.g. vacant mills and similar properties.
- Concentrate on brownfield sites

17. Proposed level of housing growth in Oakworth:

- Pasture Avenue cannot cope with additional number of houses.
- Oakworth does not need any more house.
- Too many houses in the village already without the addition of two more large estates. Village will become a small town.
- Oakworth has seen many large developments recently.
- Enough houses have been built in areas around Oakworth recently (Ebor Lane, Occupation Lane, Bogthorn)
- Object that proposals will be for 3/4 bed executive housing especially in villages. Does Keighley need all housing that is proposed?

18. Provision of affordable housing and housing need:

- Homes are marketed as affordable but there are not. They are 'buy to lets' and have extortionate rents.
- The development is not to accommodate local demand as there is not a shortage in this area - as demonstrated by semi-detached and terraced house prices being below the West Yorkshire average.
- Lack of social and affordable housing

19. Planning policy conflicts and constraints:

- Proposal would conflict with Strategic Core Policy 7 and other planning policies.
- Previous planning application rejected because of local policy constraints.
- Proposal would conflict with SCP7 and other policies.
- Would not represent sustainable development in accordance with the planning framework

20. Sustainable development and general objections:

- Site would not represent sustainable development.
- General objection to building at this site.
- The proposed development should have been part of the original development. It is unfair to impose this on residents now or over the next 11-15 years. Impact on well-being.
- Oakworth is already overdeveloped
- Lack of evidence to demonstrate housing need
- Failure to use unoccupied housing
- Build in the countryside is to ask a premium price which they would not get if built on brownbelt
- visibility splays should be possible, the major frontage to Pasture Avenue has not been put forward, otherwise it would be included in the site's red line. Visibility splays will have to involve third party land. Concerns over deliverability of the site.
- General objections to both sites in Oakworth
- Development of old Bronte Middle School site - village is struggling with the additional traffic through it due to this.
- land stability / mining issues
- New build housing would be very high and would not help the housing crisis for the Bradford District.
- To build here would mean destroying a play area for children on Pasture Avenue.
- Is all money orientated and the fact that local residents do not want this and believe it to be completely the wrong decision is being ignored.
- There is no clear vision to increase passenger capacity on local public transport. This is in contravention to the

Governments Decarbonising Transport strategic priority.

- Before allocating this site for development:
  (1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.
  (2) If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Buildings, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan.
  (3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is
  required by NPPF, Paragraph 195 or 196).
- There is no need for a further 75 houses in Oakworth, village is already over developed and the loss of Green Belt against the amount of housing is not justified
  Goose Cote Lane has over two years of building on the old Bronte School site. This housing is not completely sold/tenanted despite the site being complete for over a year.
- Driveways were blocked by contractors. The prime contractor was based in Derby – not supporting local.
- Given the slow progress in selling these homes why does Oakworth need 95 more.
- The driver seems to be to satisfy meaningless demographic targets which have no real justification.
- •Oakworth is reflective of a broad slice of people/culture. Keighley has imbalances in the socio-economic mix.
- These proposals are not popular and seen as completely unnecessary.

21. Employment

- Limited employment opportunities

Support:

1. :**General support**

- The site is highly sustainable, suitable, and available to meet some of the housing needs of the district and all the local demand in Oakworth for the plan period.
- It will help to address the planned distribution of housing land, as set out by the Council, helping to demonstrate a robust housing supply to meet Bradford's housing delivery targets, whilst also providing a range of housing types and sizes to meet the identified long-term needs of the local area as part of a sound and plan-led approach.

- The allocation of OA1/H for residential development is supported.

Comments:

1. **Flood risk and drainage**
   - If the site is considered Greenfield then surface water discharge rates post development should be restricted to the pre development Greenfield discharge rate. If the site is considered Brownfield then there should be a 30% reduction in surface water discharges, or restricted to Greenfield rates, there should be no increase in brownfield surface water discharge rates post development. To support prevention of cumulative increases to flood risk and should be in line with SuDs design principles.
   - For developments near ordinary watercourses we would recommend an 8 metre easement strip along the length of the riverbank, or a 45degree angle from the bed in the case of culverts, to be kept clear of permanent structures such as buildings. This is to maintain access to the riverbank for any improvements or maintenance. A Flood Defence Consent may be required for the LLFA for works in/affecting an ordinary watercourse.
     For main rivers, we generally require an 8 metre easement strip along the length of the riverbank to be kept clear of permanent structures such as buildings, or a 45degree angle from the bed in the case of culverts. This is to maintain access to the riverbank for any improvements or maintenance. Environmental Flood Risk Activity Permits may be required for development near rivers.
   - Consideration must be made to making space for water and providing betterment in terms of flood risk management where ever possible.

Representation IDs: 29

41, 62, 63, 68, 99, 184, 195, 204, 208, 209, 226, 248 ,249, 251, 252, 261, 262, 276, 347, 394, 529, 632, 652, 657, 917, 920, 998, 1098, 1328, 1444, 1546 ,1566, 1641, 1812, 1826, 2010, 2012, 2026, 2060, 2138, 2290, 2374, 2478, 2494, 2614, 2647, 2713, 2721, 2947, 2968, 2973, 3067, 3438, 3443, 3874, 3976, 4109, 4292, 4407 ,4418, 4645, 4729, 4730, 5479, 5623, 6402, 7167, 8925, 9007, 9135, 10069, 10074, 10266, 10290, 10421, 10460, 10531, 10995, 11073, 11378, 11399, 11431, 11495, 11589, 11623, 11654, 11665, 11724 ,11730, 11875, 12186, 12815, 12835, 12913, 13004 ,13438 ,13710, 14904, 15224, 16226, 16266, 16509, 18160, 18242, 18342, 18522, 18713, 19389, 20372, 23458 ,25275, 26608, 27594, 28261, 28689, 29442, 29535, 29637, 30051, 30123

OA2/H: Keighley Road, Sykes Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
OA2/H: Keighley Road, Sykes Lane	137	132	133	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local infrastructure • Heritage • Biodiversity • Impact on surrounding area and local residents • Proposed density/level of development • Landscape • Development of greenfield/Green Belt land • Housing • Brownfield Land/Alternative sites • Open space/Green space • Flooding and drainage • Agriculture • Encroachment • Site Constraints • General comments	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H819) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:

1. **Impact on local infrastructure**:
    - GP surgery already shifting patients due to capacity issues. GP practice is too small.
    - The development of this site will have an adverse impact on local services. The infrastructure does not adequatley support the current population. The school, doctors and dentist are all full to capacity.
- The school is already oversubscribed.
- Pressure on local secondary school for places.
- Pressure on existing amenities especially Coop
- Lack of local infrastructure
- Too high demand on schools and doctor surgery
- No dentist in Oakworth
- Airedale hospital is struggling to cope with the population already.
- Pressures on sewers already stretched.
- Public services are inadequate.
- Public transport will not be able to cope

2. **Impact on the local highway network**:

- Construction traffic / heavy vehicles will be disrupting and a safety hazard.
- The site would add to the existing congestion on Keighley Road. Traffic flow is already a problem in Oakworth.
- The junction of Slaymaker Lane and Keighley Road is already a problem with cars parked outside houses at a narrow point of the road making visibility awkward.
- Traffic at the coop causes congestion especially around the school.
- Sykes Lane is not suitable for housing due to terrible access.
- The access to Keighley Road is too steep / changes in the levels of the road.
- There is inadequate emergency access into the site / proposed emergency access is unsuitable.
- Lack of parking at the coop and GP.
- The access at Keighley Road would result in the loss of a well-used bus stop
- Increased traffic and parking issues puts children at risk.
- no road access and any development would meet the Keighley Road at a steep angle at a point of already diminished visibility, creating a dangerous situation for all road users.

- Traffic volume would increase already too high
- Traffic congestion is already a problem and this will increase.
- Issues with road safety due to volume of cars
- Parking is problematic, nowhere to park and all residents already park all along the road side. There is a lack of parking already especially at school times. Parking makes visibility an issue.
- The junction outlined with a steep drop to access the site, would be dangerous and create constant gridlock.
- Site access is a problem.
- Roads are damaged and unkept
- The narrow junction at the top of station road at the mini roundabout already struggles with the volume of traffic.
- Sykes lane also provides access to the small hamlet of Cackleshaw which would also be severely affected by this development.
- Lack of local employment will mean more commuting and more traffic.
- Victoria Road which is already dangerous (cars double parked and on pavements so pedestrians walking on road). Too narrow for emergency vehicles.
- Access from Maple Avenue is narrow and already crowded with cars, as is Victoria Road.
- Emergency vehicle access would be compromised.
- No capacity for more vehicles. Victoria Road residents park on both side of roads making access very narrow.
- Pavements are dangerous
- Roads are too narrow - refuse workers hold up roads
- Snow cause major disruption to highways
- Site access near Slaymaker Lane will increase traffic congestion
- Vehicle access to sites is awkward and considerable highways work is required for the Sykes Lane site. Access to Pasture Avenue site is along a residential road. This will put children and animals at risk.
- Disruption caused by heavy lorries coming through the village to deliver building materials, they are causing havoc in Haworth and destroying road surfaces and creating safety issues for members of the public.
- Access to OA2/H on Victoria Road is double parked making it single track
- The access off Keighley Road would require major engineering due to approximately a 2m drop to the site.
- There is also an emergency access mentioned in the plan via Maple Avenue and Victoria Road but this road past the Coop and coming out opposite the primary school is severely congested.
- The route along this road from the site would also involve private land that access has not been granted across.
- Access to OA2/H – bus stop located where access would be. Moving it would be difficult due to junction with Slaymaker Lane and cause more parking issues.

- Pedestrians leaving the site and travelling towards Keighley have no footpath until they reach Goose Cote Lane.
- Large housing complex built on Bronze Fields and another being built on Ebor Lane will cause major traffic issues getting out the village.
- Sykes Lane access onto Keighley Road dangerous.
- Access on Keighley Road would create a crossroads with Slaymaker Lane which would further slow traffic on this busy road. This crossroads would have poor visibility.
- Two bus stops adjacent to the site will disappear and no alternative location available. Many people use these bus stops.
- Traffic backing up Lidget and along Keighley Road in to Oakworth is already a problem.

3. Heritage

- The site borders a conservation area.
- Green Belt land is visible from the heritage railway – a big tourist attraction to the area. Buildings will damage the character of the area and lose its attraction to tourists.

4. Biodiversity

- The land is home to wildlife and should be preserved. Development would cause damage to local ecology.
- Wildlife areas must be protected. There are deer, hedgehogs and bats on the site.

- **Environment**
- Increase in pollution
- Noise levels will increase
- Wildlife should be protected
- Depletion of local wildlife.
- land forms part of the green belt / green corridor and should be prioritised for maintaining the natural landscape and local wildlife - mammals, deers, birds and amphibians such as tree planting or left as wild meadow. wildlife, Deer, pheasant, grouse, Kestrels, owls, a female Sparrow Hawk and bats
- Building more houses is not good for the environment
- Developing this greenfield site would impact on wildlife, the environment and openness in the heart of Bronte Country.
- Loss of trees
- No consideration of the mine shaft or the overhead powerlines.

- Increase in animals causing problems on pavements (i.e. dog mess).
- Site is within the protected area of the South Pennine Moors SPA/SAC. It provides a wildlife corridor and natural habitat for wildlife. SA indicates minor adverse effects for a range of environmental SA objectives.
- There is no clear vision to increase passenger capacity on local public transport. This is in contravention to the Governments Decarbonising Transport strategic priority.

5. Impact on surrounding area and local residents:

- Site provides a buffer between residential developments and the rural land.
- Development will change the rural character of the village.

6. Proposed density/level of development:

- Development would have a negative impact on the views of the Worth Valley.
- No consideration of other local developments completed/currently underway (Heron Way/Fletcher Court/Valley View Court/Exley Head and Ebor Lane) despite the impact on Oakworth Local Centre. Have these developments been considered in the numbers of house required.

7. Landscape

- Character of the village is being eroded.
- Oakworth is a village and should remain a village. No more houses.
- The site has long distance views to Haworth and Bronte Moors. This is enjoyed and of benefit to many local residents taking exercise and walking surrounding Rights of Way and footpaths.
- Site borders onto conservation areas what abo0ut the wildlife.
- Site will ruin beautiful landscape.
- sloping fields between Keighley urban edge and Oakworth. Important visual break between two settlements allowing open views out toward Haworth.
- Major impact on landscape and a visually prominent site impact on views and openness of Green Belt.
- Impact on Conservation Area
- The views between The Millennium Garden/Ashville Terrace would be blocked and lost to the detriment of existing residents/future generations.

8. Development of greenfield/Green Belt land:

- Development would significantly harm the openness of the Green Belt.
- Land identified is Green Belt and should be preserved.
- Greenbelt should be protected
- Object to development on Green Belt land
- Should not build on Green Belt - previous developments refused due to this
- Need Green Belt for wildlife and for the environment
- The site is Green belt should be kept that way
- This site is prime Greenfield and Greenbelt land, and if developed would be lost forever. It is one of the last remaining open Greenbelt spaces close to Oakworth centre.
- Building should not be done on green belt when there are plenty of more suitable places.
- Very special circumstances necessary to justify development of the green belt have not been demonstrated. Proposal would conflict with LP Strategic Core Policy 7 and other policies in planning framework. Would not represent sustainable development in accordance with the planning framework.
- The NPPF highlights that the Local Authority must identify a housing need on this site. Building on Green Belt land is in contravention to the Government's Green Belt policy as set out in set out in chapter 13 of the National Planning Policy Framework (NPPF).
- Green Belt field has already been developed with a caravan resident without planning permission or enforcement.
- The development of this area could harm elements which contribute to the significance of this designated heritage asset. Assessments need to be carried out. Harm must be reduced.
- Proposals through Keighley and area district which is against Government and Bradford Council Green Belt and Zero Carbon Future policies resulting in sprawl, loss of identity, damage to wildlife, loss of natural views loss of green habitat and wildlife, pollution.
- There is no need for a further 75 houses in Oakworth, the village is already over developed and the loss of Green Belt against the amount of housing is not justified

9. Housing

- The village has reached capacity for new housing / is overdeveloped.
- what about housing that is unoccupied by missing landlords? Should be CPO
- Lack of social housing being provided
- No affordable housing provided as part of development
- Object that proposals will be for 3/4 bed executive housing especially in villages. Query does Keighley need all housing that is proposed.
- Could consideration be given to building sheltered housing/wardened flats for the over 60s or some bungalows.

- Query the reasons for requiring 75 dwellings in Oakworth.

10. Brownfield Land/Alternative sites

- Greenfields should not be destroyed. Empty mills should be modernised and reused.
- There is plenty of brownfield land (in Keighley and Shipley) (e.g. at Dalton Mills) which should be used**.**
- There are brownfield sites available in Keighley & Bradford that should be prioritised before this area is considered for further residential properties.
- There is land available on the open space to the north of Moor Drive in Oakworth which is already within a residential area and would not affect the greenbelt.
- A more sustainable alternative would be to develop the numerous brownfield sites/unused mills/buildings within the council area.
- sites should be developed nearer employment that do not strain public transport.
- Regenerate Keighley redevelop buildings there.
- the proposed second phase at that site (KY9/H) would be much more appropriate than building at the sites proposed in Oakworth.
- Brownfield first - previous brownfield site in Oakworth discounted on Providence Lane – should be considered above Green Belt

11. Open space/Green space

- Site is open space and should be protected
- This area as green space contributes to the view of worth valley from Oakworth that would be adversely affected by further housing.
- The removal of further Green space that is paramount in supporting mental health and well-being and the natural environment.
- The removal of further Green space that is paramount in supporting mental health and well-being and the natural Environment
- concerns over facilities to support families
  (park / garden space)
- Impact on Bronte Fields football pitches: Just across Sykes Lane from the development is the football pitches leased by Oakworth Juniors.
- Children benefit from the green belt sites, this will impact on their out door space which they use.

12. Flooding and drainage

- Flooding of lower areas to this site, including Cackleshaw, is now an problem which will be made worse.
- There are natural springs within the site which makes it unsuitable.
- Surface water flooding is already a problem for Sykes Lane/Cackleshaw
- The site is unsuitable for housing, as water courses and springs run through this marshy land (The name Sykes is derived from the Middle English word "Syke" inferring marshy stream or damp gully).

- Field is needed for water drainage - Slaymaker and Branshaw often have water flows that is ankle deep.
- houses surrounding this area also have drainage issues in their gardens which this would increase.
- The field provides good drainage and helps prevent flooding.
- The area has serious drainage problems as experienced on Maple Avenue site. Two top fields each have ponds.
- Site is filled with ancient drains not pipes. This could be an issue for developers.
- Site in Flood Zone 1. Mitigation should be in 1 in 100 cc level. Should be in line with SuDs principles. Development should be restricted to Greenfield pre-development discharge rates. Recommendations on design for flood risk. Site may be within proximity to greater flood risk zones. Consideration must be made to make space for water and flood risk management.
- Drainage run off from both sites would cause flooding lower down Cackleshaw, Station Road and Providence Lane

13. Agriculture

- The fields are good pasture land and should be protected**.**

14. Encroachment

- Developing this greenfield site would create urban sprawl by connecting the village of Oakworth with the Western edge of Keighley. It would also connect and encroach the historic farming hamlet of Cackleshaw on Sykes Lane. Oakworth would no longer be a village and Cackleshaw no longer a hamlet.
- a few green belt plots remain within the Oakworth area and separate the village of Oakworth from the sprawl of Keighley, this proposed development will remove this barrier.
- Will harm openness of countryside and fail to protect it from encroachment.
- it will mean that Oakworth will no longer be a village and merge with Haworth.
- The site if accepted could be the instigator for potential sprawl in the future.
- Planned development will merge Keighley & Oakworth.

15. Site Constraints

- The site is in a very steep location.
- The site contains former mining holes making the site unsuitable.

16. Heritage

- Have a responsibility to protect the area so that future generations may enjoy the natural history and safety of the village.

17. General comments

- A public meeting should be held with a face to face consultation, issues with consultation
- Oakworth is already overdeveloped
- More houses would be dangerous for children in the area
- Development would be detrimental to local residents and their quality of life.
- Housing locally not sold with estates already being built.
- There is already a large housing estate at Hareton Way and construction in process at Branshaw Park
- Why not finish the houses on the old Bronte School Site, which is now partly as dumping ground houses are unoccupied
- Development will drive out local support to business community.
- Site important for mental health of residents.
- General objection to OA1/H and OA2/H
- The only reason people want to build in the countryside is to ask a premium price which they would not get if built on brownbelt
- House prices will reduce, views spoilt, ambience of village eroded.
- people will be moving out and further afield therefore putting pressure on the existing villages in the area- Haworth, Cossroads, Cullingworth.
- Regularly used by walkers
- There is minimal employment in the village. Most people work elsewhere.
- Given the slow progress in selling these homes why does Oakworth need 95 more.
- The driver seems to be to satisfy meaningless demographic targets which is no real justification. Oakworth is reflective of a broad slice of people/culture. Keighley has imbalances in the socio-economic mix. These proposals are not popular and seen as completely unnecessary.

Support:

1. **General Comment**

- Site is available. Would be designed with the setting of the conservation area as a priority appraisal states that there is potential to create a stronger boundary to the green belt and we would look to achieve this through good design.

Comments:

1. **General comment**

- There is a larger section of land available for more housing to help meet housing requirements for the district. This could be phased in later.

Representation IDs: 14, 21, 34, 49, 69, 70, 81, 112, 185, 207, 227, 247, 250, 431, 440, 695, 810, 999, 1100, 1261, 1329, 1446, 1537, 1543, 1544, 1564, 1567, 1600, 1636, 1738, 1773, 1813, 1816, 1819, 1828, 1836, 1848, 1994, 2035, 2083, 2221, 2289, 2431, 2482, 2648, 2657, 2826, 2922, 3065, 3206, 3501, 3727, 3831, 3873, 3878, 3995, 4305, 4394, 4408, 4420, 5011, 5058, 6007, 7169, 7228, 7229, 8155, 8926, 9008, 9136, 10061, 10068, 10075, 10267, 10422, 10461, 10532, 10754, 10996, 11084, 11116, 11252, 11361, 11379, 11400, 11432, 11461, 11496, 11590, 11624, 11655, 11666, 11725, 11731, 11876, 11956, 12187, 12816, 12837, 12914, 13005, 13099, 13439, 13711, 13829, 14905, 15225, 16227, 16267, 16510, 18161, 18243, 18343, 18523, 18714, 19390, 19540, 20373, 20380, 20442, 23459, 23519, 24666, 25255, 25276, 25287, 25665, 26609, 28007, 28085, 28262, 28690, 29443, 29536, 29555, 29638, 30052

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 133 within the consultation document.

Summary of Consultation

A total of **32** representations were received in relation to Question 133 with 33 respondents. Respondents included Highways England, local residents, town council and agents. **Table 92.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 92.6**.

Table 92.5: Consultation Question 133: Oakworth Preferred Site Allocations - Overview of Representations Received -

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q133	32	33	31	0	2

Table 92.6: Consultation Question 133: Oakworth Preferred Site Allocations - Summary of Representations Received

Oakworth Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Impact on the local highway network • Environment • Green Belt • Infrastructure • Alternative site • Landscape	The Council has reviewed the multiple representations made on the **Oakworth Preferred Site Allocations** and they have been considered in the justification and drafting to the new Policy OA1: Oakworth, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

• Brownfield sites • Flooding and drainage • Heritage • Highways • Environment	

Summary of Representations
Objections
1. Impact on the local highway network: • Unsafe site access • Road is too narrow to site • Safety concerns over children near site access • Traffic is a problem, too many cars and congestion • Congestion on Lidget and heavy lorries already cause problems on Station Road en route to Vale Mill • Parking is a problem especially near Coop and school • There is no site access and access near Slaymaker Lane will cause accidents • Level differences will cause major issues for the Oakworth Rd site and access from Maple Avenue is very narrow and congested already. • Sykes Lane OA2/H this will make a road through from Sykes Lane to Station Road, Planning permission was turned down a few years ago because of this. • Dockroyd Lane and Park Avenue are dangerous and the congestion spreads up Victoria Road/Street onto Maple Avenue.
2. **Environmen**t • Houses will damage ecology and the community. • Adverse effect on wildlife • Pollution and air quality concerns • Destroying countryside • Only wild meadow left, damage to wildlife. Owls bats, mice, voles, squirrels and newts. • Impact for older residents who will lose green spaces used for well-being

- A HRA would be undertaken to ensure there are no significant effects on these protected sites.
- Losing this agricultural land will mean we lose habitats for small animals and birds, and the corridors that allow other animals to move safely.

3. Green Belt

- Site is Green Belt
- Destroying the Green Belt
- Green Belt removal will link towns and cause urban sprawl
- In isolation, site OA1/H constitutes an irregular protrusion into the Green Belt.
- Both sites are Green Belt and building on this type of land eliminates the reasons people want to live in Oakworth. Close access to green spaces which people can easily walk to.

4. Infrastructure

- Not enough school places
- Doctors oversubscribed
- Not sufficient infrastructure to support development
- Development will put further strain on amenities

5. Alternative site

- Objection to the rejection of site OA/016 Wide Lane.. Heirtage impact reason acnnot be substantiated. approved access offers adequate visibility splays. approved access offers adequate visibility splays.
  Development can offer a significant public benefit a new length of footpath, something that the Highway Authority will never be able to deliver. Majority of the site has been previously developed. This is a discrete site in landscape terms.
- Alternative sites have been inappropriately assessed. E.g. OA/016 which is currently vacant, lower visual impact, naturally limited to prevent sprawl. Report does not consider previous use of this land, and provides incorrect accessibility statement.

6. Landscape

- Site will ruin beautiful landscape
- Development would cause only very minimal landscape impact.

7. Brownfield sites

- Bradford has brownfield sites that should be developed

- Green belt should be removed from the plan and brownfield sites built on first less environmental impact.
- Brownfield sites in Wide Lane and providence Lane and the Lower Providence Mill site should be built before greenfield.

8. Flooding and drainage

- issues of water drainage haven't been addressed. water often comes down Branshaw and Slaymaker (and down lidget) in rivers surrounding property gardens waterlogged.
- built the new houses on Maple Grove/Privet Drive they found the sewerage and drains could not cope.
- issues with water and sewage, no new resevoir, sewage treatments will need extending

9. Heritage

- Heritage has been cited as a reason for rejection but it appears no HIA was carried out.

10. General comments

- Oakworth is already overcrowded
- New developments should focus on Keighley and preserve the countryside
- Oakworth not suitable for further development
- change in town centre use with the decline of retail needs to be creative and help to preserve the surrounding countryside.
- Nearby housing developments have not sold
- Sites get over-developed and not S106 monies or planning conditions met
- Only one planning panel and Keighley not represented
- Council never consider community feedback
- Strongly disagree with housing developments OA1/H and OA2/H
- The reasons for rejecting the site are not substantiated and appear contrived. Site could deliver a major positive effect on the health SA Objective. Minor positive effects were predicted for nearly all other socio-economic SA Objectives.
- The site is sustainable located adjacent to the settlement boundary within a reasonable proximity to services and facilities.
- Agriculture is a very important part of the Worth Valley. The economy would be totally different and the land would revert back to unmanaged areas damaging Oakworth and the rest of the valley reducing the attraction of the area to visitors.
- Site is allocated green field for a reason. Greedy and short-sighted to develop here. unhappy with council's lack of care for the residents of people living in Keighley and the more rural parts of the District. Destroying open land which is benefical for people's health.

Support
No support comments received
Comments
1. Highways • It is not considered that locating development on their own in Oakworth will impact capacity of the strategic road network. This will be identified through evidence base. However, quantum of sites forms part of a cumulative impact and rest of development aspirations in local Plan could severely impact SRN this impact needs to be established by CBMDC and Highways England.
2. Environment • Deficiency of allotments in Oakworth. Town council willing to work with CBMDC to identify suitable land for allotments.

Representation IDs: 25, 36, 40, 45, 46, 66, 67 ,107, 192, 196, 254, 484, 1012, 1524, 1684, 2061, 2104, 2261, 2273, 2477, 2615, 2728, 3435, 4406, 4731, 6029, 10999, 15522, 16273, 24665, 27584, 29817

2.93 OXENHOPE

Introduction

The Local Plan settlement hierarchy identifies Oxenhope as a Local Service Centre. This means that it will see a smaller scale of development, comprising both market and affordable housing, as well as the protection of its local centre to help ensure the continued provision of economic activity in the area

Portrait & Local Area Strategy

The Local Plan provides a portrait of Oxenhope's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as question 134 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of 12 representations were received in relation to the Oxenhope portrait and Local Area Strategy (Question 134) from 12 respondents. Respondents included, Highways England, the local MP, Oxenhope Village Council, local residents, and a Ward Councillor. **Table 93.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 93.2**.

Table 93.1: Overview of Representations Received - Question 134: Oxenhope Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
134	Oxenhope Portrait & Local Area Strategy	12	12	9	0	3
	Totals	**12**	**12**	**9**	**0**	**3**

Table 93.2: Summary of Representations Received - Oxenhope Portrait & Local Area Strategy

Oxenhope Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
134	Oxenhope Portrait & Local Area Strategy	12	12	9	0	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on local infrastructure/services • Impact on character and community • Flood Risk • Impact on open space/green fields • Proposed green corridor • Alternative Options • Housing Numbers • Government Policy • Impact on Road Network • Consultation Process	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy OX1: Oxenhope, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

Summary of Representations
Objections
1. Development on Green Belt land: • Green belt should be removed from the plan and brownfield sites built on first, Bradford has a plentiful supply of brownfield sites. • Retain the Green Belt.

- Previous planning application refused on Green Belt grounds.
- Exceptional circumstances are required to remove land from Green Belt.
- No justification to support removal from Green Belt.

2. Impact on local infrastructure/services:

- Local school is already at full capacity.
- Developing Cross Lane would cause extra traffic on route to school.
- Infrastructure in Oxenhope cannot sustain extra households – public transport, internet, electricity supply, parking issues, traffic, road links, schools, doctors, Ambulance Service, water/sewage etc
- Without expansion of the village commercial infrastructure there is limited scope for the present facilities to support further growth.
- Oxenhope falls outside the response times for Fire Service to attend incidents.
- Inadequate proposals for upgrading infrastructure needed for extra housing.

3. Impact on character and community:

- Development proposals will lead to urbanisation of a predominantly rural village.
- Oxenhope holds its charm for tourism and tourism should always be considered.
- Oxenhope is a picturesque village.
- The planet cannot sustain this population growth.
- Local Co-op customers cause traffic congestion and double parking.
- Visual impact of development upon the views from Oxenhope Station Conservation Area.

~~4.~~ Flood Risk:

- Concreting over the suggested fields will affect the houses lower down with regard to surface water drainage/run-off.

5. Impact on open space/green fields:

- Importance of green space/access to countryside for physical and mental well-being. Eroding Green Belt impacts on available green space. Haworth/Oxenhope have been visited by thousands of people during lockdown.
- Destruction of Green Fields is against government policy on protection the environment.

6. Proposed green corridor:

- Do not reduce the Green Corridor to extend the footprint of the built-up area.

7. Alternative Options:

- The preferred option for new housing provision in Oxenhope should be via organic growth: infilling small brownfield sites, and not by re-allocation of land use.
- No other reasonable options for development are included.

8. Housing Numbers:

- Allocating 100% more houses than identified as required is unfair on Oxenhope.
- Disagree that Oxenhope has only 5 units committed but not delivered, this figure should be much higher.
- Objection to plan for 44 extra houses - this won't help locals rent or buy, but will be for people with money to eventually end up as a part of Keighley town centre.
- Local authorities must identify housing need for each settlement –this has not been explored sufficiently to justify building on green belt in Haworth/Oakworth/Oxenhope.
- The more houses built the more houses needed: E.g. in the 1950s the average family was a mother, father and 2.4 children, meaning that for every 8 houses built a ninth was required. Today the average family is larger than in the 50s.

9. Government Policy:

- This is in contravention to the Governments Decarbonising Transport strategic priority.

Support

No comments in support

Comments

1. Housing Numbers:

- Dispute of figures shown in table 1 of Local area strategy- there are 27 houses from unimplemented approvals in the village.

2. Impact on Road Network:

- Development in Oxenhope would not on its own have a severe impact on the Strategic Road Network.
- It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

3. Consultation Process

- Consultation held during Covid19 lockdown means people are disenfranchised from the process due to not having online access or skills. Face to Face consultation sessions should have been conducted.

Representation IDs: 485, 3754, 4425, 4470, 6598, 6797, 6922, 8320, 15523, 18231, 23590, 28260

Sites

As highlighted above, two sites were put forward in the Preferred Options document to meet the proposed development requirements for Oxenhope (both for residential). Under Q135 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **90** representations were received in relation to Sites OX1/H to OX2/H from **88**-respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents and a Ward Councillor. **Table 93.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 93.4**.

Table 93.3: Oxenhope Proposed Sites (OX1/H to OX2/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
OX1/H: Crossfield Road	32	31	28	1	3
OX2/H: Cross Lane	58	57	54	1	3
Totals	**90**	**88**	**82**	**2**	**6**

Table 93.4: Oxenhope Proposed Sites (OX1/H to OX2/H) - Summary of Representations Received

OX1/H: Crossfield Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
OX1/H: Crossfield Road	32	31	28	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on surrounding area/community • Impact on local infrastructure/services • Impact on local highway network • Proposed site access point • Development of Green Belt land • Brownfield land • Proposed Housing Density • Housing provision • Affordable housing • Loss of green space • Impact on wider environment and biodiversity • Flood risk and drainage • Scale of development • Heritage impact • Landscape and visual impacts • Topography	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H833) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Impact on surrounding area/community:
2. **Impact on local infrastructure/services:** • Local infrastructure (electricity supply, drains, internet speeds, gas mains/pressure) inadequate. Sewerage system not fit for purpose. • Further housing will add pressure to already inadequate local amenities. Capacity of doctors, schools, shop. No doctors or dentists in the village. No direct walking or bus route to secondary school in Cullingworth.
3. Impact on local highway network: • Potential off-road parking for 40+ vehicles is unachievable. • Lack of frequent public transport. Residents will rely on cars and the site will not contribute to sustainable development. No clear vision to increase passenger capacity on local public transport. • There is only once access proposed which will create congestion. Station Road, Shaw Lane already congested. Parking on Moorhead Lane/Crossfield Road is already a problem. • Development will cause increased traffic, noise, pollution, and road safety issues. Sight lines for traffic exiting Crossfield Road are already dangerous.
4. Proposed site access point: • Site access to narrow and too steep. • Access not in the same ownership. Residents will not allow their land to be used.
5. **Development of Green Belt land:** • Site is Green Belt and development would be inappropriate. Boundary should not be changed just to create a better boundary. Site is protected from development. Impact on openness. Exceptional Circumstances /Very Special Circumstances not demonstrated. • Sufficient land is available on Oxenhope without expansion into the Green Belt. • No justification for the proposed housing number and removal of Green Belt.
6. Brownfield land:

- Use derelict built up places. Many brownfield sites in Bradford, Shipley and Keighley which are more suitable. Regenerate social housing that are empty / boarded up.

7. Proposed Housing Density:

- 20 houses is too great a density.

8. Housing provision

- Sufficient housing already been built in Oxenhope. Development would provide no meaningful contribution to housing stock or affordability.
- No justification for the proposed housing number and removal of Green Belt.
- Approximately 25+ planning consents have already been approved but not yet started. The rest will be taken up by derelict barns and mills. This site alone equals the remaining allocation requirement and is unnecessary.

9. Affordable housing

- There is sufficient affordable housing.
- Affordable housing won't be viable due to costly drainage works.

10. Loss of green space:

- This will remove another greenspace near the centre of the village. There are few green spaces left in the village.

11. Impact on wider environment and biodiversity:

- Destruction of Green Infrastructure corridor, wildlife habitat. Site is a diverse environmental asset worthy of preservation. Biodiversity loss.
- Site is within 2.5km of the SPA/SAC - impact on protected birds. Potential to lead to the loss of functionally linked land.
- Full survey for Golden Plover likely to be required. Following West Yorkshire Ecology Service methodology. Allocation text needs to include survey requirements clearly if functionally linked land cannot be ruled out.
- Development would have a severe effect on woodland and TPO.

12. Flood risk and drainage:

- Development within a flood zone. Surface water flood risk. Flooding would surcharge sewers, flooding raw sewage in to adjacent properties. Flood risk exacerbated downstream and in adjacent properties.

13. Scale of development:

- Development not in keeping with the context and scale of local area.

14. Heritage impact:

- Damage to setting of Oxenhope Station Conservation Area and nearby grade II listed buildings. Historic character must be protected and heritage assets enhanced.
- Moor House and adjacent barn to the West of the site are Grade II listed. The site is 250m west of the Oxenhope Station Conservation Area. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be an adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.

15. Landscape and visual impacts:

- Detrimental impact on the landscape.
- Buildings will compromise views across the valley. Visual impact from surrounding areas. Lead to overshadowing and loss of amenity.

16. Topography

- Field slopes at quite a gradient.

Support:

1. **Proposed site access point**:
   - Access can be made to adoptable standards.
2. **Site density:**
   - Supportive of the allocation. Density is representative of standard approach, although number of dwellings to be accommodated is likely to be lower given the nature of the site.
3. **Green belt boundary:**
   - Supportive of the correction of the Green Belt boundary to make it more defensible.
4. **Timescales:**
   - Delivery timescales should be moved to 1-5 years.

Comments:
1. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply. • Sites that are adjacent to or include rivers and becks within their boundary must make full consideration of the value of these features for biodiversity and green-blue infrastructure, as well as the wildlife habitat network. it is particularly important to recognise that rivers and becks cannot be replaced elsewhere, and that continuity of habitat along them is essential to maintaining and improving their ecological condition, and in maximising their contribution to green networks.

Representation IDs: 422, 790, 942, 1217, 1256, 2220, 2224, 2841, 3052, 3458, 3464 ,3521, 3601, 4457, 4484, 5478, 5583, 8067, 14118, 15664, 17136, 18045, 18245, 18413, 19882, 19894, 23748, 28263, 28699, 29276, 29444, 29537

OX2/H: Cross Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
OX2/H: Cross Lane	58	57	54	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Conservation areas • Green infrastructure • Tourism • Flood zone and Drainage • Traffic • Neighbourhood Plans • Infrastructure Requirements • Green and open Space • Support for site allocation	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and identified as (H834) in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Objections:
1. Conservation area • Negative impact on the Oxenhope Station Conservation Area and its setting.
2. Green Infrastructure • Damage to the Green Infrastructure Corridor around Moorhouse Beck and the wildlife habitats and species.
3. Tourism • Impact on tourism which is essential for the village.

4. **Flood zone and drainage**
   - Site within flood zones 2 and 3, poor drainage. Area regularly floods. Open drainage channel that feeds into the millennium green.

5. **Traffic**
   - Danger to school children due to increase in traffic. Cross Lane is used for parking for the school and becomes busy at drop-off/pick-up times.

6. **Neighbourhood Plan**
   - Site not in the Oxenhope Neighbourhood Plan. There are better site in Oxenhope further up Moorhouse Lane or Hill House Lane / Hebden Road which are in the Neighbourhood Plan.

7. **Local services and infrastructure**
   - Ability of existing infrastructure to absorb increased population.
   - Capacity of school and other services.

8. **Local green spaces**
   - Green spaces are increasingly being appreciated for people's wellbeing. Removing this protected green space seems an error.

Support:

1. **Local services and amenities**
   - Close to local amenities such as schools

2. **Access**
   - Good access from nearby Cross Lane

3. **Availability**
   - Land capable of being sensitively development with gifting of part of the land to local authority for continues green space use.

Comments:

1. **Village green space**
   - **Query over whether site is designated green space**

2. **Flood risk**
   - Flood zones 2 and 3 and small part of draft 3b in the site boundary. Post development discharge rates should be restricted to the pre development rate. Mitigation will be required including raised floor levels and area for compensatory storage. Consideration should be given to making space for water and manage flood risk where possible

Representation IDs: 337, 756, 873, 955, 1039,1131, 1218 ,1255, 1296, 1374, 1744, 2113, 2524, 2543, 2994, 3295, 3604, 3779, 4499, 5601, 5832 ,5996, 6073, 6102, 6977, 7144, 8066, 8434, 9868, 10502, 10517, 10984, 12290, 12790, 13126, 13699, 14119, 14373, 15602, 16391, 16428, 18246, 18310, 18414, 19125, 19753, 19895, 21041, 21161 ,21379, 22765, 23589, 23749, 23864, 24681, 25523, 28700, 29445

93.1 In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 135 within the consultation document.

Summary of Consultation

93.2 A total of 6 representations were received in relation to Question 135 from 6 respondents. Respondents included Highways England, local residents, a design company and a local agent. **Table 93.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 93.6**.

Table 93.5: Consultation Question 135: Oxenhope Preferred Site Allocations - Overview of Representations Received

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q135	6	6	5	0	1

Table 93.6: Consultation Question 135: Oxenhope Preferred Site Allocations Summary of Representations Received

Oxenhope Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Green Belt Land and Assessment • Flood Risk • Proposed Site • Site Omissions • Impact on Road Network	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy OX1: Oxenhope, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

Summary of Representations
Objections
1. Green Belt Land and Assessment: • Bradford has a plentiful supply of brownfield sites that have not been developed, brownfield building should be made easier to protect Green Belt. • Green Belt Assessment does recognise that a combination of Marsh Lane/Moorhouse Lane will be more compliant with the NPPF than a wooden post/rail fence. • The boundary proposed, two public highways are permanent and obviously defensible. • Green Belt Assessment is contradictory purpose 4, on page 2 the contribution is assessed as “major" yet the summary, which in this respect is agreed concludes that it is Low. • Site would represent a reasonably logical rounding off the settlement •
2. Flood Risk: • Surface water flood risk has been removed.
3. Proposed Site: • Site is poor quality grazing land. Northern boundary to the new houses comprises a wooden post/rail fence, and gabions. • The site is seen in the context of recent development to the south and a ribbon of development fronting Marsh Lane to the west. • Landscape impact, site has no greater impact than some other allocations. • Could be delivered now for self-build, parties have already approached the landowner expressing self-build interest. • Contribution to 5 year supply.
4. Site Omissions: • Object to the rejection of site OX/001. Site has a history of being allocated for development in the past but was reallocated as Village Green Space in the last plan (RUDP). The site should not be Local Green Space. The SHLAA indicated the site has no public access, does not contribute to the setting of the area and does not fulfil the village greenspace designation. The site does not meet the Local Green Space criteria. There are no special features which make it beautiful, no public access for recreation, it is not of historic value, is not rich in wildlife and is too large a parcel of land to be allocated for LGS. The site at Cross Lane has more beauty and significant as a LGS site. It has a number of special features: hedgerows, trees, nesting birds, watercourse etc. The site at Crossfield Road should not be identified for development as it undermines the Green Belt designation and sets a precedence for Green Belt erosion.

Development of this site with a sensitive design provides an opportunity to enhance the conservation area. Any flood risk and ecological impact could be mitigated.

- Site would be accessed from Denholme Road and there is a bus stop adjacent to the site. The site would have positive effects on the socio-economic SA Objectives.
- Object to the rejection of OX/001 and the allocation of the site as Local Green Space. Site history of being allocated for housing development. The planning inspector stated that its development should be guided by a Design Brief to be produced by CBMDC, pre PPG3. This land was re-allocated as Village Green Space. SHLAA assessment described as :- “Village green-space notation does not represent the site as it has no public access and does not contribute in any way to the setting of the area. Slightly sloping grubby field between houses”. When the site is judged by the development team on its own merit, the site should not be Local Green Space. It is only following consultation with the Parish Council that this designation is allocated. Site does not meet the criteria for Local Green Space as set out in the Oxenhope Neighbourhood Plan. Local Green Space designation should only be used where the site is demonstrably special and holds local significance because of its beauty, historic significance, recreational value and richness of its wildlife. There are no special features to the field.

Support

No comments in support

Comments

9. Impact on Road Network:

- Development in Oxenhope would not on its own have a severe impact on the Strategic Road Network.
- It was noted that any impacts would be identified as part of the transport evidence being prepared, in the wider cumulative impacts of growth proposed in the Local Plan.

Representation IDs: 486, 11001, 15524, 18410, 29035, 30213

2.94. QUEENSBURY

Introduction

The Local Plan settlement hierarchy identifies Queensbury as a Local Growth Centre. It is considered to be a sustainable locations and is accessible to higher order settlements. As such it will help make a significant contribution of the meeting the District's housing needs, employment and providing supporting community facilities. Based on this it is proposed that the settlement has a housing target of 450 dwellings. A total of nine housing site allocations sites were proposed to deliver these development requirements.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Queensbury's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as consultation question 136 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **19** representations were received in relation to the Queensbury portrait and Local Area Strategy (Question 136) from **15** respondents. Respondents included, Highways England, the Great Northern Railway Trail Development Group, local residents, the Parish Council and a Ward Councillor. **Table 94.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 94.2**.

Table 94.1: Overview of Representations Received - Question 136: Queensbury Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
136	Queensbury Portrait & Local Area Strategy	19	15	15	1	3
	Totals	**19**	**15**	**15**	**1**	**3**

Table 94.2: Summary of Representations Received - Queensbury Portrait & Local Area Strategy

Queensbury Portrait & Local Area Strategy	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Air pollution • Alternative site • Biodiversity / ecology / landscape • Brownfield land / empty homes / sequential approach • Character • Employment • Existing population • Green Belt • Highways – access, congestion • Cycle / walkways / active travel • Highways - cumulative capacity of the highway network • Protected Routes (Queensbury Tunnel) • Affordable housing • Housing numbers • Infrastructure – dentists, doctors , retail / services / facilities, schools • Open Space • Retail - local centre boundary • Site options	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy QB1: Queensbury, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

Summary of Representations
Objections
• The congestion at the cross roads and around the primary schools causes significant pollution and generates a health hazard for residents.
• Queensbury Golf Course should be allocated for housing development. It is in a sustainable location near to local shops, schools, amenities, facilities, bus stop and proposed allocation QB4/H.
• Report not factually correct. Impact on wildlife not fully considered. The areas identified for development contain a lot of wildlife and will remove scenic views across the valley.
• Bradford has a plentiful supply of brownfield sites. Brownfield sites should be built on first.
• Consideration should be given to empty homes and buildings as an opportunity to create new homes instead of taking the easiest and cheapest option.
• Development should take place in the following order: PDL, greenfield, Green Belt.
• Development will ruin the character of Queensbury.
• Opportunities to increase employment have been missed. There isn't sufficient provision of employment opportunities.
• Queensbury is already over populated.
• The plan promotes excessive use of Green Belt.
• Green belt land is precious and green space is important to both wildlife and mental health.
• Green Belt land should not be developed and should be removed from the plan. In the Aireborough judgement it was found that Green Belt sites should not be included in the development plan solely on the basis of reducing housing number around the district proportionately.
• There are too many proposed development with poor access.
• There is too much traffic and it is unsafe to only have one entrance/exit out of new developments.
• Exiting Harrowins Farm Drive is already difficult. Adding more traffic will make it worse. In bad weather the road is really hazardous.
• Both main roads in Queensbury are regularly congested. They cannot deal with an increased volumne of traffic. Side roads are used as 'rat-runs' to avoid the queues.
• The plan should include a requirement to provide cycle/walkways on each new housing development and a design which encourages active travel and discourages car reliance. There should be segragated cycleways along each access road and extended along main roads through Queensbury.

• The location of development in Queensbury on it own is unlikely to have a severe impact on the capacity, operation and safety of the Strategic Road Network. However, the quantum of sites forms part of a wider cumulative impact within the plan area and which could severely impact the Strategic Road Network. The scale of this cumulative impact will need to be established by the Council and considered by Highways England.
• Protection of the Queensbury Tunnel is supported. However, this should be emphasised and included in the Local Areas Strategy text. The protected route needs to be shown on the plan and should follow the former railway line.
• The area has a low percentage of affordable housing and this has not been addressed.
• The Local Plan should seek a more ambitious housing delivery target for Queensbury as one of the six Local Growth Centres. Account should be taken of the few residential planning commitments in Queensbury (19 units). The lack of existing commitments should be reflected in the Council's delivery strategy. A 20% buffer to the housing delivery target should be included to take account for non-implementation or under delivery.
• The strategy for Queensbury should be amended with the housing target increased to 750-1000 and making specific reference to the strategic allocation at Queensbury Golf Course.
• There is not enough housing land provided for Queensbury. The Core Strategy provision figure of 1000 houses should be used.
• No capacity in local dentist for new NHS patients.
• There is only one GP surgery now. Health services are at capacity. Additional development would overwhelm them.
• Report not factually correct. Queensbury does not have a library, does not have a good selection of shops. Majority of retail units are take-aways or haridressers/beauticians.
• Schools are full / oversubscribed.
• Report not factually correct. Impact on infrastructure not fully considered. The plan does not provide adequate infrastructure planning.
• Queensbury has seen a lack of investment (closure of swimming pool, council library) together with an increase in house building. There are no employment opportunities, schools are oversubscribed, congestion is servere. The council needs to commit to ensuring additional infrastructure is provided.
• The open space designation should be removed from Queensbury Golf Course.
• If the Queensbury Golf Course site is allocated for housing, part of the site could include provision for allotments.
• Queensbury local centre boundary should be extended to include the Tesco store and retail units to the south.
• Although green belt areas are included, the proposed developments seem like obvious choices.
• Some of the site chosen are not the most suitable or sustainable locations.
Support
• Support protection of the Queensbury tunnel – needs to be shown correctly on the map

• Although green belt has been included, these seem an obvious choice
Comments
1. Highways – locating development here in not likely to have an severe impact on the capacity, operation and safety of the strategic road network.

Representation IDs: 270, 487, 1980, 3381, 3389, 4058, 4141, 4386, 4608, 5023, 5060, 5208, 5592, 5593, 5598, 6766, 10968, 15525, 17302

Sites

1.1 As highlighted above, nine sites were put forward in the Preferred Options document to meet the proposed development requirements for Queensbury (all 9 for residential). Under consultation question 137 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

1.2 A total of 105 representations were received in relation to Sites QB1/H to QB9/H from 102 respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents. **Table 94.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 94.4**.

Table 94.3: Queensbury Proposed Sites (QB1/H to QB9/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
QB1/H: Albert Road, Brighouse and Denholme Road	5	5	3	1	1
QB2/H: Albert Road	3	3	0	2	1
QB3/H: Black Dyke Mills, Brighouse Road	6	6	3	2	1
QB4/H: Brighouse Road	50	47	43	6	1
QB5/H: Jackson Hill Lane, Brighouse Road	6	6	3	2	1
QB6/H: Station Road west / Sharket Head Close	6	6	2	3	1
QB7/H: Fleet Lane	10	10	8	1	1
QB8/H: Long Lane	11	11	9	1	1
QB9/H: Long Lane	8	8	7	0	1
Totals	**105**	**102**	**78**	**18**	**9**

Table 94.4: Queensbury Proposed Sites (QB1/H to QB9/H) - Summary of Representations Received

QB1/H: Albert Road, Brighouse and Denholme Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
QB1/H: Albert Road, Brighouse and Denholme Road	5	5	3	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on the local highway network • Development of Green Belt land • Proposed Housing Density • Impact on Public Rights of Way • Allocation of Queensbury Golf Course (alternative site) • Housing to meet local needs • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H868 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Impact on the local highway network: • Development will add pressure to the highway network. Survey of area deemed it as a hazard with the need for the school crossing patrol to be kept in place. Site is too close to school.
2. **Development of Green Belt land:**

• The site is located in the Green Belt.
3. Proposed Housing Density: • A different approach to the density of non-greenbelt sites need to be taken - so that this site does not need to be allocated.
4. Impact on Public Rights of Way: • The site is next to a well-used footpath/bridleway.
5. Allocation of Queensbury Golf Course (alternative site): • Requests that Queensbury Golf Course is allocated for housing development. Indicates that it is a sustainable site close to/within walking distance of services and bus stops. (Does not make reference to site QB1/H).
Support:
1. Housing to meet local needs: • Support the allocation to give people more opportunities to buy a house as opposed to moving away from families.
Comments:
1. Flood risk/drainage: • The site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 1972, 4619, 5470 , 5620, 28768

QB2/H: Albert Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
QB2/H: Albert Road	3	3	0	2	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Problem site • Flooding/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H869 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
No representations received in objection
Support:
1. Problem site: • Support for the development of this site as it has been an eyesore for many years. Access road is far enough away from the school so as not to cause major issues.
Comments:
2. Flooding/drainage:

- Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. There should be a 30% reduction in surface water discharges, or restricted to Greenfield rates. There should be no increase in brownfield surface water discharge post-development. SuDs design principle should apply.

Representation IDs: 4621, 5624, 28769

QB3/H: Black Dyke Mills, Brighouse Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
QB3/H: Black Dyke Mills, Brighouse Road	6	6	3	2	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on open / green space • Availability of the site • Impact on heritage • Suitability of the site • Flood risk/drainage	The Council has undertaken a review of the representations including material planning issues raised, and undertaken further work on plan technical evidence, impact assessments and site detail and concluded that this site (now referenced as H835) is not carried forward as a preferred option and excluded / rejected. Further details of the reasons for the site being excluded are included in the Strategic Land Assessment (SLA). Further details of the reasons for rejection are included in the Site Assessment Methodology paper (Part B).

Summary of Representations
Objections:
1. Impact on open / green space: • The land has been retained for Open Space.
2. Availability of the site: • Land belongs to the management company owned by the residents of Queensbury Gardens estate and is not for sale.
3. Impact on heritage:

• Development could harm the elements which contribute to the significance of the designated heritage assets of the Queensbury Conservation Area and Grade II Listed Black Dyke Mills, including the Mill Chimney.
• The HIA underplays the potential harm development would have to the setting of Black Dyke Mills.
• Development would be harmful to the conservation area with a continuation of suburban development which would further erode the rural setting which greatly contributes to its character.
• Development would also be harmful to the setting of the Grade II listed mill by blurring the historic relationship this had with the valley to the south which may have been historically used as an access.
• The Queensbury Conservation Area Assessment clearly states how the rural setting that surrounds the conservation area contributes greatly to its form and character. Wider views into and out of the conservation can be had due to the descending slope of mainly open land away from the village. The green land which buffer the conservation area contribute to the feeling of being a rural industrial village. The views from the south towards the mill, such as those obtained from Syke Lane are therefore important to the significance and appreciation of the Conservation Area. These contributions have not been afford appropriate consideration by the HIA.
• A large part of the site is on sloping ground and it is difficult to envisage how development could take place on the site without causing considerable harm to the setting of the Conservation Area and Black Dyke Mills.
Support:
1. Suitability of the site: • The land is unused and will become an eyesore. A relatively small number of houses is proposed and will have only a limited impact on infrastructure.
Comments:
1. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 1141, 1743, 4622, 5629, 28770, 29446

QB4/H: Brighouse Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
QB4/H: Brighouse Road	50	47	43	6	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local infrastructure • Access to the site and impact on the local highway network • Development of Green Belt land • Development of greenfield land • Housing density • Housing numbers • Impact on amenity and increases in pollution • Impact on biodiversity and ecology • Impact on green space • Impact on the landscape, views, vistas and topography • Impact on village character • Design • Flood risk / drainage • Potential contamination on-site • Alternative site option • Planning permission • General objection to the development of the site • Alternative site proposal • Deliverability	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H870 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

• Green belt assessment • Impact on the local highways network • Sustainability of the site • General support for the allocation of the site	

Summary of Representations
Objections:
1. Impact on local infrastructure: • There is a sewer and large catchment tank underneath the site which cannot be built on. As well as an access road across it for Yorkshire Water access to an adjacent sewage pumping station. • The Queenshead Park development has insufficient infrastructure on the estate e.g. access road, school spaces, loss of wildlife, no designated park for children to play, not enough doctor surgeries, dentists. There is a lack of services already in the area. • The sewage system already struggles with the existing number of houses and will not cope with additional houses. There have been many issues with drainage of sewage including dirty water coming up through the plughole. • There is no additional infrastructure, or boost to local amenities to compensate for this new development.
2. Access to the site and impact on the local highway network: • There is no access to the site off Harrowins Farm Drive. Access would be through the two cul-de-sacs. Houses on these cul-de-sacs were assured this site would not be developed. Access through these roads is unacceptable to residents. • Development would allow access along quiet cul-de-sac increasing road traffic and causing a safety hazard for children. • Parking on the new development is already stretched and would cause further obstruction to houses for emergency services. Increasingly difficult to wall around the estate, especially with a pram. Parking issues also affecting bin collection. • There is too much traffic on the roads. Development would cause more traffic on busy small estate roads. It would add to congestion and pollution in the area. Only one entrance/exit is currently an unsafe situation. Additional speed measures will be needed. • The main road into Queensbury is already congested without adding more homes onto this route. • The roads are dangerous in winter due to the incline of the hill. More cars on the roads will make it difficult to get out of the estate.

3. Development of Green Belt land:

- The site is classed as green belt and needs to be protected. Green belt land is essential to preserve the beauty of the area and open space.
- Land next to Black Dyke View identified as not fit to build on and would remain green belt.
- The site proforma assesses the site as having a moderate potential for sprawl. The site should more appropriately be identified as exhibiting low potential for sprawl. The site is well contained by surrounding development, prevent further sprawl. Development would provide a stronger Green Belt boundary.

4. Development of greenfield land:

- Object to greenfield land being taken up in an already built up area.

5. Housing density:

- An alternative approach to density would mean that this site along with other green belt sites will not be required to be allocated to meet development needs.

6. Housing numbers:

- No more houses are needed.

7. Impact on amenity and increases in pollution:

- Development will cause loss of light, overshadowing, overlooking and loss of privacy, visual amenity.
- Development will cause unacceptable disruption, noise and pollution. The dirt, mud, dust and sand from the existing estate has only just gone.

8. Impact on biodiversity and ecology:

- If the golf course is also developed there will be no greenspaces or place for wildlife.
- There are deer grazing on this site regularly. The area is a path for wildlife. Badgers are seen here and should not be disturbed as are other wildlife including bats, barn owls, squirrels, rabbits.
- This area is full of wildlife.
- There are a large number of TPO trees on site.

9. Impact on green space:

- The site would make a lovely park instead.
- Development of the site will result in the loss of green space.

10. Impact on the landscape, views, vistas and topography:

- The development will result in the loss of scenery and will be an eyesore. Beautiful green countryside is being destroyed as well as the fantastic view.
- Development will have an impact on the landscape.
- The site is not reasonably flat. It rises 80 feet from east to west.

11. Impact on village character:

- The amount of proposed development is too much for one area to take and will significantly alter the current village character in a negative way.

12. Design:

- The houses will be unsightly.

13. Flood risk / drainage:

- Building on greenfield land will affect the drainage and cause more flooding.

14. Potential contamination on-site:

- There is a proportion of land at the west of the site which is contaminated with asbestos due to tipping prior to the building on the adjacent site.

15. Alternative site option:

- Land at Queensbury golf course should be allocated for housing development. The site can be accessed from the main road. There is no difference in the location and sustainability of the golf course. The high street, Tesco and associated bus services to Bradford and Halifax are less than 10 minutes' walk away. Schools and medical centres are available in less than 20 minutes' walk. The golf course would allow access to site QB4/H.

16. Planning permission:

- Objection to the planning permission granted to build these houses.

17. General objection to the development of the site:

- Correspondence from developer of existing estate indicating that land will not be built on.
- Developer should finish the existing site before planning another.
- Development will result in the devaluing of existing properties.

Support:

1. Alternative site proposal:

- Land at Queensbury Golf Course should be allocated for housing development. The site is in a sustainable location near to local shops, schools and bus stop.

2. Deliverability

- The site is considered to be developable within 3/5 years. Baseline surveys have established that there are no fundamental physical constraints.

3. Development considerations:

- Development considerations including the provision of compensatory improvements to the surrounding Green Belt, enhancement to existing environmental assets, ecological surveys, protection of TPO and a sensitively designed scheme and layout must be required to ensure wildlife is protected and strengthen.

4. Green belt assessment:

- Agree that the site currently makes a low contribution to the purposes of including land within Green Belt. Development would enable a stronger, more defendable and permanent Green Belt boundary to be defined.
- The site should more appropriately be identified as exhibiting low potential for urban sprawl. It is well contained by surrounding development. The golf course provides a strong prevention to future sprawl.

5. Impact on the local highways network:

- There is a formalised direct access now in situ.

6. Sustainability of the site:

- Support the allocation of this site as it is in a sustainable and accessible location. The same must be concluded for the golf course site which should be allocated.

7. General support for the allocation of the site: • Although the site is Green Belt, development would connect well with recent adjoining development and a relatively small number of houses would have a minimal impact on infrastructure.
• General support for the allocation of site QB4/H for housing.
Comments:
1. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 1141, 1743, 4622, 5629, 28770, 29446, 201, 341, 2139, 3383, 4181, 4623, 5005, 5021, 5028, 5063, 5070, 5218, 5222, 5265, 5291, 5315, 5327, 5335, 5350, 5392, 5441, 5456, 5546, 5560, 5562, 5564, 5565, 5596, 5626, 5632, 5660, 5697, 5727, 5734, 5794, 5796, 5802, 5803, 5811, 5816, 5829, 5847, 5875, 5969, 5976, 8144, 10944, 25115, 25120, 28771

QB5/H: Jackson Hill Lane, Brighouse Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
QB5/H: Jackson Hill Lane, Brighouse Road	6	6	3	2	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Impact on the local highway network • Housing density • Sustainable development • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H871 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Objections:

1. **Development of Green Belt/greenfield land:**
   - Concern that the development would be out of keeping with the surrounding area and would adversely affect the Green Belt.
2. **Impact on the local highway network:**
   - Would have major impact on Jackson Hill Lane which is dangerous.
3. **Housing density:**
   - A different approach to the density of non-greenbelt sites need to be taken - so that this site does not need to be allocated.

Support:

1. **Sustainable development:**

- Support for the allocation of QB4/H and QB5/H as sustainable and accessible sites. With the same conclusion being drawn for the Queensbury Golf Course site adjacent.
- Support for the allocation of the site from the site promoters/landowner emphasising the sustainability of the site in terms of access to services, the new stronger Green Belt boundary that would be created, the provision of some affordable housing and public open space.

Comments:

1. **Flood risk/drainage:**
   - Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 4625, 5635, 8145, 10945, 28772, 30053

QB6/H: Station Road west / Sharket Head Close

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
QB6/H: Station Road west / Sharket Head Close	6	6	2	3	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Housing density • Impact on heritage • Environmental impact, trees and design • Proposed site access • Site boundary • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H872 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations

Objections:

1. **Housing density:**
   - A different approach to the density of non-greenbelt sites need to be taken - so that this site does not need to be allocated.

2. **Impact on heritage:**
   - The site is adjacent to the Queensbury Conservation Area and close to a number of listed buildings including Victoria Hall. An assessment should be undertaken as to the contribution the site makes to those elements which contribute towards the significance of those heritage assets especially the listed buildings.

Support:

1. Environmental impact, trees and design: • Support for the development but trees along Station Road should be maintained/enhanced, and development should be of a sensitive design.
2. Proposed site access: • Access should not be taken from Station Road as this is frequently used by users of the Great Northern Trail.
3. Site boundary • Support the development of this site but object to the boundary as the allocation should include the full SHLAA site.
Comments:
1. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 4627, 5636, 8146, 13317, 28773, 29447

QB7/H: Fleet Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
QB7/H: Fleet Lane	10	10	8	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on the local highway network • Impact on local infrastructure • House prices • Housing density • Scale of development • Pollution • Impact on views • Impact on health and wellbeing • Housing density • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H873 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations

Objections:

1. Impact on the local highway network:

- Development is too large. Fleet Lane will be overwhelmed with little opportunity to improve the road. Road used by pedestrian to access two primary schools (Foxhill school and Shibden Head Academy).

- Concern about additional traffic.
- Roads to access the site are unsuitable for an increase in vehicles and construction wagons. Current on street parking limits Fleet Lane to one way. Development of Queensbury Golf Course would be more beneficial to residents.
- Fleet Lane too narrow to access site. There is also a blind bend. An increase in traffic on Fleet Lane and surrounding areas from development at QB1/H and QB2/H will increase congestion and make exiting near the primary school very dangerous. Increase in pollution, noise, congestion.
- Development will compound existing traffic issues. Fleet Lane is narrow and extremely busy at peak times. New Park Road and Old Guy Lane are narrow. Chapel Lane junction is dangerous.

2. Impact on local infrastructure:

- Impact on local services and amenities would be significantly detrimental.
- Concerns relating to the capacity of school and displacing existing residents.

3. House prices

- The development of the site will have a negative impact on house prices.

4. Housing density

- Support for the allocation but indicates an increased density to 30dph could yield 330 homes and would help meet the urban uplift.

5. Scale of development

- May be less houses would be more appropriate.

6. Pollution:

- Concern about additional pollution, noise disruption, and environmental impact.

7. Impact on views

- Negative impact on rural views.

8. Impact on health and wellbeing

- Loss of greenspace and negative impact on health and wellbeing of existing residents.

Support:

1. Housing density: • Support for the allocation but indicates an increased density to 30dph could yield 330 homes and would help meet the urban uplift.
Comments:
1. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 181, 211, 234, 2264, 3375, 4630, 5052, 5087, 5637, 28774

QB8/H: Long Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
QB8/H: Long Lane	11	11	9	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local amenity • Development of Green Belt/greenfield land • Development of brownfield land • Housing density • Impact on the local highway network • Public transport provision • Impact on local infrastructure • Impact on public rights of way • Flood risk / drainage • Mapping errors • Improvements to the site	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H874 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations

Objections:

1. **Impact on local amenity:**
   - Development would be to the detriment of the Upper Shibden Valley and local amenity.

2. **Development of Green Belt/greenfield land:**

- Development would be on Green Belt.
- Green Belt site and impact on the valley below would be significant.

3. Development of brownfield land:

- Many brownfield sites in Bradford need to be regenerated and would help with the housing numbers.

4. Housing density:

- A different approach to the density of non-greenbelt sites need to be taken - so that this site does not need to be allocated.

5. Impact on the local highway network:

- This area has already had many new housing developments all accessed of Long Lane. There is too much vehicular traffic on Long Lane. It is a dangerous narrow road. Pavements are narrow or non-existent. Further along the road narrows to a single lane with a blind bend and no pavement.
- Not enough parking on recent developments. On-street parking close to several junctions making visibility dangerous for road users. Further development will only add to this.
- Development in recent years to north and south of Long Lane have led to an increase in traffic and street parking on junctions/pavements making exit from Lower Hazelhurst dangerous. Development at this site will further exacerbate the problem.
- Long Lane not designed for high levels of traffic that already use it. The large high school nearby generates high traffic volumes. Area is used as a ratrun. Further housing will exacerbate the problem.
- Long Lane is narrow with calls for it to be made one way. Road is congested by parked cars towards the junction with Deanstones Lane. Large secondary academy, sports pitches and small industrial/office development close to this junction. Recent developments have not provided improvements to Long Lane.

6. Public transport provision:

- The local bus service is unreliable.

7. Impact on local infrastructure:

- No provision has been made for infrastructure.
- Local schools are full. There is only one GP practice as the other one relocated.
- Can the infrastructure, drainage, water supply, electricity supply etc cope with additional housing?

- If forced to use electric cars can the electricity supply cope with the additional load of cars being charged.

8. Impact on public rights of way:

- The site contains a well-used footpath.

9. Flood risk / drainage

- Field acts a soak away for water reducing the risk of flooding. Development will increase the risk of flooding elsewhere.

10. Mapping errors:

- The map is inaccurate as it does not show the recent development of 140 homes.

Support:

1. Improvements to the site:

- Site should be put back into use. Litter is thrown into the field, dog mess left at the edges, barns broken into and damaged caused.

Comments:

1. Flood risk/drainage:

- Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 677, 2082, 2416, 2419, 3906, 4132, 4184, 4631, 5644, 8147, 28775, 28774

QB9/H: Long Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
QB9/H: Long Lane	8	8	7	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local amenity • Impact on local infrastructure • Development of Green Belt land • Housing density • Impact on the local highway network • Impact on public rights of way • Flood risk / drainage • Mapping errors	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H875 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Impact on local amenity: • Development would be to the detriment of the Upper Shibden Valley and local amenity.
2. Impact on local infrastructure: • No provision for infrastructure.
• Local schools are full. There is only one GP practice as the other one relocated. • If forced to use electric cars can the electricity supply cope with the additional load of cars being charged.

3. Development of Green Belt land:

- The site is in the Green Belt.
- Green Belt site and impact on the valley below would be significant.

4. Housing density:

- A different approach to the density of non-greenbelt sites need to be taken - so that this site does not need to be allocated.

5. Impact on the local highway network:

- This area has already had many new housing developments all accessed of Long Lane. There is too much vehicular traffic on Long Lane. It is a dangerous narrow road. Pavements are narrow or non-existent. Further along the road narrows to a single lane with a blind bend and no pavement.
- Development in recent years to north and south of Long Lane have led to an increase in traffic and street parking on junctions/pavements making exit from Lower Hazelhurst dangerous. Development at this site will further exacerbate the problem.
- Long Lane is used as a rat run. Additional housing will generate more traffic resulting in delays. People's safety needs to be taken into account.
- Long Lane is narrow with calls for it to be made one way. Road is congested by parked cars towards the junction with Deanstones Lane. Large secondary academy, sports pitches and small industrial/office development close to this junction. Recent developments have not provided improvements to Long Lane.
- The local bus service is unreliable.

6. Impact on public rights of way:

- Site contains a well-used footpath.

7. Flood risk / drainage:

- Field acts a soak away for water reducing the risk of flooding. Development will increase the risk of flooding elsewhere.

8. Mapping errors:

- The map is inaccurate as it does not show the recent development of 140 homes.

Support:

No representations received in support.
Comments:
1. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 678, 2415, 3903 ,4133, 4633, 5645, 8148, 28776

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 137 within the consultation document.

Summary of Consultation

1.3 A total of ~~7~~ representations were received in relation to Question 137 ~~from 4~~ respondents. Respondents included Highways England, local residents, the NHS and a housebuilder. **Table 94Error**! *No text of specified style in document.***.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 94Error**! *No text of specified style in document.***.6**.

Table 94 Error! No text of specified style in document.**.5: Consultation Question 137: Queensbury Preferred Site Allocations - Overview of Representations Received**

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q137					

Table 94 Error! No text of specified style in document.**.6: Consultation Question 137: Queensbury Preferred Site Allocations - Summary of Representations Received**

Q137 :Queensbury Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Highways - congestion • Infrastructure – schools, doctors • Infrastructure - capacity • Site QB3/H	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy QB1: Queensbury, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

• Biodiversity / ecology / landscape • Brownfield land - Empty homes / buildings • Character • Green Belt • Brownfield land • Alternative site - Queensbury Golf Course • Housing provision	

Summary of Representations
Objections
1. Highways issues • Queensbury suffers with traffic problems • The local infrastructure is adequate to support additional housing development.
2. Local services and amenities • Queensbury suffers with access to primary schools • Queensbury suffers with access to GP surgeries • Queensbury suffers with access to leisure facilities • The Council has systematically reduced services in the village.
3. Black Dyke Mills • Site QB3/H - Black Dyke Mills, Brighouse Road belongs to the management company and owned by the residents of Queensbury Gardens and is not for sale. The site provides much needed green space for residents of Queensbury Gardens and neighbouring streets.
4. Impact on wildlife • Impact on wildlife not fully considered. • The areas identified for development contain a lot of wildlife and will remove scenic views across the valley.
5. Re-use of empty homes • Consideration should be given to empty homes and buildings as an opportunity to create new homes instead of taking the easiest and cheapest option.

6. Impact on local character

- Development will ruin the character of Queensbury.

7. Green belt

- Green belt land is precious and green space is important to both wildlife and mental health.
- Green Belt land should not be developed and should be removed from the plan. In the Aireborough judgement it was found that Green Belt sites should not be included in the development plan solely on the basis of reducing housing number around the district proportionately.
- Bradford has a plentiful supply of brownfield sites. Brownfield sites should be built on first.

8. Queensbury Golf Course

- Site should be allocated for housing development. It is in a sustainable location near to local shops, schools, amenities, facilities, bus stop and proposed allocation QB4/H.
- Sustainability of the Queensbury Golf Course site: The Town Centre High Street, Tesco Store and associated bus services to Bradford and Halifax are all less than a 10 minute walk away at approximately 600m to the north. A local parade of shops is also within 250m to the north. Schools and medical centres are available within less than a 20 minute walk at 1.2km away. There is also a bus stop located directly outside of the site for those that are less mobile and may require assistance to get to the town centre
- The Queensbury Golf Course site has significant advantages over the Fleet Lane site (QB7/H)

Support

1. Proposed site:

- The Council need to build more houses in the Queensbury area.

Comments

1. Queensbury Golf Course

- Site should be allocated for housing development. It is in a sustainable location near to local shops, schools, amenities, facilities, bus stop and proposed allocation QB4/H.

Representation IDs: 42, 271, 488, 1897, 1931, 1945, 1971 ,1975, 1977, 1981, 1982, 1983, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1998 ,2002 ,2004 ,2005, 2009, 2015, 2016, 2023, 2037, 2038, 2039, 2087, 2101, 2107, 2115, 2118, 2119 ,2120, 2129 ,2140, 2168, 2174, 2200 , 2219 ,2223 ,2253 ,2255 ,2260, 2268, 2274, 2298, 2299,2305, 2307, 2310 ,2319, 2324 ,2346 ,2359 ,2360 ,2361, 2362, 2364, 2368 ,2443 ,2474, 2476 ,2484, 2491, 2507 ,2508, 2511, 2516, 2548, 2563 ,2569 ,2579 ,2585 ,2645 ,2683 ,2731, 2741 ,2796 ,2800, 2807, 2896, 2901, 2904,

2934, 3084, 3085, 3188, 3335, 3387, 3424, 3427, 3470, 3542, 3738, 3745, 3912, 3944, 4022, 4038, 4045 ,4059, 4124, 4173, 4179, 4200, 4201, 4348, 4390, 4455, 4502, 4526, 4552, 4617, 4788, 5000, 5256, 5563, 5570, 5658, 10238, 10848, 10936, 10972, 13318, 15526, 16759

2.95 THORNTON

Introduction

The Local Plan settlement hierarchy identifies Thornton as a Local Growth Centre. Thornton is identified as one of six Local Growth Centres (alongside neighbouring Queensbury). This means that it is identified as an accessible, attractive and vibrant place to live, work and invest should be enhanced. Being location along a key road and public transport corridor, there is an expectation that it will make a significant contribution to meeting the District's needs for housing, employment and provide for supporting community facilities. Based on this it is proposed that the settlement has a housing target of 575. A total of 11 sites allocations were proposed to deliver these development requirements.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Thornton's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as consultation question 138 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **29** representations were received in relation to the Thornton Portrait and Local Area Strategy (Question 138) from **29** respondents. Respondents included, Highways England, the Great Northern Railway Trail Development Group and local residents. **Table 95.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 95.2**.

Table 95.1: Overview of Representations Received - Question 138: Thornton Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
138	Thornton Portrait & Local Area Strategy	29	29	25	2	2
138	**Totals**	**29**	**29**	**25**	**2**	**2**

Table 95.2: Summary of Representations Received - Thornton Portrait & Local Area Strategy

Thornton Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
138	Thornton Portrait & Local Area Strategy	29	29	25	2	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Highways • Impact on local infrastructure/services • Heritage • Impact on Landscape • Brownfield • Flooding and drainage • Economy • Housing • Environment • General Comments • Housing • Landscape	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy TH1: Thornton, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

Summary of Representations
Objections

1. **Development on Green Belt land:**
   - Encroachment on to the Green Belt.
   - Green Belt should not be built upon.

2. **Highways**
   - Thornton Road traffic volume is already too high.
   - Main Road already has high rate of traffic accidents.
   - Speeding traffic and increase in traffic creating rat runs.
   - There are parking problems in Thornton.
   - Traffic congestion and roads damaged
   - Thornton already has lots of traffic.
   - Incomplete traffic data.

3. **Impact on local infrastructure/services:**
   - Local infrastructure is not sufficient; pressure on local amenities- dentist, doctors, schools, local amenities, hospital
   - Lack of policing

4. **Heritage**
   - A high number of houses will wipe out heritage.
   - Lack of consideration to Bronte heritage
   - Should preserve the Bronte legacy

5. **Impact on Landscape**
   - The Bronte Way on the north side would be ruined and habitats (within 7km of the moor) would be destroyed need to refer to Thornton Conservation Area Assessment.
   - the village will still have the valley to the south of the main road. The fields between Thornton Hall and Ashfield House area are a setting for St James Church and the ancient Bell Chapel, also part of The Bronte Way - a key visitor attraction.
   - Character of the village will be changed and ruined
   - Thornton is a village of green space what gives it its character. Its why people live in Thornton.
   - Thornton is a conservation area - many homes are listed buildings
   - Periphery should not extend further into countryside

6. Brownfield

- Brownfield sites have not been developed.
- Brownfield should be built on first before Green Belt as ruled by Judge Lieven.
- City Centre has areas for development first
- CBMDC lack of vision for regeneration using green field/ Green Belt and not -utilising brown field, derelict sites

7. Flooding and drainage

- Issues with water and drains.
- Natural springs within the fields
- Increased risk of water run off affecting lower buildings and roads lower due to reduced capacity of land to absorb water.

8. Economy

- Development will ruin Bronte Way and Bronte Stones walk and the route, Brontes is vital to region nationally and regionally. Walks are vital for tourism and very popular. Tourism supports Bradford economy. Development will damage this.

9. Housing

- There are already too many houses in Thornton
- House prices will increase
- It should be down to the residents who reside in area to make planning decisions.
- 500 houses is too high for Thornton
- Empty properties are in issue in Thornton
- Dwellings could be built on other roads which is in keeping with the character if those roads.
- Modern housing shouldn't be built.
- Objection to sites TH2/H, TH4/H, TH5/H, TH8/HC and TH9/H to TH11/H - houses should not be built on them

10. Environment

- Emphasise the need for environmental and habitat protections.
- Environmental impact development will have and impact upon wildlife and community.
- Increase in noise pollution
- Increase in pollution

- Nature and views will be destroyed.
- Valley should be a green corridor to stop destruction of flora and fauna.
- Increase in air pollution
- site close to habitat which is legally protected
- Some fields an existing pit site
- Increased threat to livestock from 'out of control' dogs. Increased volume of dog faeces fouling local footpaths, pavements and other habitats.
- Open space is important for well-being

11. General Comments

- Big is not better.
- Reducing village to 'commuter' belt where majority of new residents are not actively engaged in the community.
- Unhappy with removal of greenfields, no housing allowed in the Green Belt, there is 1 property in Denholme. Strong disagreement with whole policy which prevents any housing in hamlets or along country roads, but at the same time allows 3 houses in the green belt to be converted into one. (at Green Clough, Thornton).
- Sites in Thornton completely inappropriate with 7 green sites which have been targeted.
- There will be an increase of crime.
- Thornton from a village in to a housing estate.
- Allerton sites are brown field but most are flats and apartments.
- Comments on Allerton and local plan is not sympathetic to Allerton residents' needs.

Support

1. Landscape

- Protect and enhance the biodiversity and landscape character of the Pinch Beck Valley, the Great Northern Railway Trail and the Bronte Way .
- Preserve Pinchbeck Valley should be surrounded by Green Belt to preserve character.
- area between Thornton Hall and Ashfield House is part of the Bronte Way and should have strong preservation status.
- Thornton is a conservation area - many homes are listed buildings

2. Housing

- The development must be high quality and sensitively managed

• Modern housing shouldn't be built
3. Environment • Emphasise the need for environmental and habitat protections. • Habitats for wildlife are varied with frequent sightings of owls, hare, deer and badgers on the sites
Comments
1. Highways • Not thought that individual sites on their own will negative affect the strategic road network (SRN) the cumulative impact of sites within the plan could severely after the SRN. The cumulative impact will need to be established by CBMDC and Highways England.
2. Landscape • Protection should not just be afforded to biodiversity and landscape character but also to the route of the Trail itself. Need to offer protection and extension of the Great Northern Railway Trail from its existing open section to the west of Thornton to link with the 250-housing scheme recently approved to provide long-term sustainable infrastructure for recreation, wildlife, and journeys to work and school. Use £20,000 S106 agreed.

Representation IDs: 17, 166 ,408, 504 ,758, 1026 ,1042 ,1109 ,1315, 1386, 1956 ,2081 ,2150 ,2711, 3019, 3135, 3187, 3465, 4342, 4674, 4824, 5185, 5212, 5414, 5569, 13354, 15447, 15527, 17300

Sites

1.1 As highlighted above, 11 sites were put forward in the Preferred Options document to meet the proposed development requirements for Thornton (all 11 for residential). Under Q138 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

1.2 A total of ~~64~~ representations were received in relation to Sites TH1/HC to TH11/H from ~~53~~ respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents and a Ward Councillor. **Table 95.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 95.4**.

Table 95.3: Thornton Proposed Sites (TH1/HC to TH11/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH1/HC: Hill Top Road	14	14	10	1	3
TH2/H: Thornton Road	119	117	114	4	1
TH3/H: Thornton Road	16	16	9	5	2
TH4/H: Hill Top Road	16	16	11	3	2
TH5/H: Hill Top Road	20	20	18	0	2
TH6/H: Dole and Prospect Mills, Thornton Road	16	16	7	6	3
TH7/H: Old Road	7	7	1	3	3
TH8/HC: Thornton Road West	19	19	12	2	5
TH9/H: Hill Top Road, Close Head Drive	12	12	11	0	1
TH10/H: Hill Top Road, near Ring O' Bells	13	12	12	0	1

TH11/H: South of Hill Top Road and East of Close Head Lane	16	15	14	1	1
Totals	**268**	**264**	**219**	**25**	**24**

Table 95.4: Thornton Proposed Sites (TH1/HC to TH11/H) - Summary of Representations Received

TH1/HC: Hill Top Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH1/HC: Hill Top Road	14	14	10	1	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on surrounding area/community • Impact on local infrastructure/services • Proposed site access point • Use of brownfield land • Housing standards • Impact on ecology/biodiversity • Impact on open / green space • Flood risk and drainage • Character, landscape and visual impacts • Impact on heritage • Impact on public rights of way • Deliverability	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1316 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Impact on surrounding area/community: • Development would result in the village becoming part of the commuter belt and not actively involved in the village.
2. **Impact on local infrastructure/services:** • Infrastructure cannot cope with further development. No capacity at doctors and dentists.
3. Impact on local highway network: Congestion on Thornton Road is bad and the road is dangerous. There is no/limited public transport with just 1 bus an hour.
4. Proposed site access point: • Access to the site is not sufficient for the volume of traffic. Thornton Road and Hill Top Road struggle to cope with existing levels of traffic. Junction with Hill Top Road and James Street not suitable for increase in vehicles.
5. Use of brownfield land: • Brownfield sites should be used including old mills.
6. Housing standards: • Building standards should be adopted which have insulation standards at Passiv House or carbon neutral level. Grants should be made available to help achieve this on less viable sites.
7. Impact on ecology/biodiversity: • The site will have an impact on wildlife and protected habitats.
8. Impact on open / green space • Green open spaces should be protected.
9. Flood risk and drainage: • Potential surface water runoff and flooding affecting lower buildings, and reducing capacity of land to absorb water.
10. Character, landscape and visual impacts:

- This site together with adjacent sites will create a large housing estate and would adversely affect the character of Thornton village. These developments will change the landscape of a rural village.
- Development will have a detrimental impact on making the village more attractive to tourists. Damaging impact on the character of the village and the Bronte connection.

11. Impact on heritage:

- Industrial, rural and literary heritage should be preserved.

12. Impact on public rights of way:

- This development would cause destruction of the historic network of paths and byways.

Support:

1. Impact on public rights of way:

- Need to ensure protection around Hedley Lane track.

Comments:

1. Flood risk/drainage:

- Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

2. Deliverability

- Doubts relating to the deliverability of the site due to the junction of Hill Top Road and Wiken Lane being substandard.

Representation IDs: 172, 590, 1030, 1073, 1080, 2712, 3025, 5137, 5151, 5224, 12369, 13356, 28757, 29918

TH2/H: Thornton Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH2/H: Thornton Road	119	117	114	4	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local infrastructure • Impact on local amenity • Impact on the local highway network • Location of the proposed site access • Impact on ecology / biodiversity • Impact on green / open space • Increase in carbon emissions/pollution • Design of development • Housing standards • Flood risk / drainage • Impact on heritage • Impact on village character • Impact on the landscape and views • Topography • Impact on public rights of way • Land supply • Proposed density/level of development • House prices • Affordable housing provision • Development of greenfield/Green Belt land	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1351 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

• Development of agricultural land • Impact on livestock • Suitability of location • Potential construction issues • Impact on local economy and tourism • Impact on council services • Impact on ecology / biodiversity / landscape character • Community • Design of development • Deliverability	

Summary of Representations
Objections:
1. Impact on local infrastructure: • Educational quality will be lost if the school is expanded to accommodate additional pupils as a result of this development. • Small dentist cannot support the amount of people. • Doctor's surgery will not be able to support additional population. Already difficult to get an appointment. • Thornton poorly served by fire, ambulance and police. Police point closed despite growing population. • Infrastructure in Thornton will not support another 150 houses. • Lack of sports facilities - Thornton pool closed. • The village will not sustain additional properties which will overwhelmed schools and impact children's education. Increased demand for school places. • Shops are already overcrowded and will not be able to support additional population.
2. Impact on local amenity: • Development will lead to an increase in litter. • Development will overlook existing buildings impacting on light and privacy.

3. **Impact on the local highway network**:
   - New roads will need to be built causing further disruption/destruction.
   - Increased use of minor surrounding rural roads.
   - More peripheral development contributes to the decline of the inner city. More suburban development results in more roads, traffic, vehicle movements, pollution.
   - The development will generate more traffic on already busy roads, causing congestion. This will increase the likelihood of further accidents. Village already overwhelmed with lorries, cars and vans.
   - Development will lead to parking issues on Thornton Road. No parking in the village near shops causing accidents. Thornton Road narrows to one lane during school times when parents park on both sides of the road. Parking provision required.
   - Safety at school crossing due to increase traffic and students.
   - Impacts on the wider road network e.g. Girlington junction and Keelham junction, James Street junction.

4. **Location of the proposed site access**:
   - The site is difficult to access from Thornton Road.

5. **Impact on ecology / biodiversity**:
   - Impact on biodiversity, soil degradation (basic ecosystem foundation), owl, kestrel, bat feeding ground, impact on amphibians, badgers, foxes and many other species of birds.
   - The site is within 7km of the moors.
   - Development would result in the loss of trees.
   - Woods in the cemetery are graded/listed and important habitats.
   - Site should be converted to wildlife preservation
   - Development would have an impact on the flora on the site - nearby honey farm will be affected - development will stop bees and other pollinators from foraging.

6. **Impact on green / open space**:
   - Development would spoil the peaceful setting of the cemetery and its tranquillity.

- Site covered by open space designation - development would destroy open aspect. The area needs to be protected as the present village green status for the local community. Object to loss of green space. (Part of site is Village Greenspace in RUDP).
- Thornton does not have a park.
- There are 27 people on the waiting list for allotments.
- The cemetery may become an unofficial recreation area is no open space is planned with the development.
- Removal of countryside, greenspace and trial will add to the already stretch NHS services. If adults and children have nowhere to walk/exercise their health will suffer.

7. Increase in carbon emissions/pollution:

- Development will result in an increase in CO_2 emissions.
- Development will lead to an increase in air pollution.
- Development will create noise and light pollution.

8. Design of development:

- Development will be destructive and look horrible.

9. Housing standards

- The Council should adopt Passiv House, carbon neutral standards for all new homes. Grants/subsidies could be used in areas which are not viable.

10. Flood risk / drainage

- The fields hold a lot of water. Building on it will have series consequences for drainage. Increased risk of water run-off affecting lower buildings and road due to reduced capacity of land to absorb water.
- Land is not suitable for building on given the presence of underground springs.
- Current problems with water running down the hillside (and down Wensley Bank Terrace and Thornton Road freezing in winter). The road is permanently saturated. Development will add to this problem. The watercourses on the site need investigating before development can go ahead. Could cause damage to existing properties.
- Drainage is already a problem in Thornton. Development would require significant improvement.
- The mains/sewers are not capable of coping without major reconstruction of the drains/sewers.

11. Impact on heritage:

- Impact on Thornton's heritage and Bronte Stones project.
- Thornton should be preserved for its history and links to the Brontes. This area is of historical importance, cultural significance and outstanding natural beauty. Proximity to grade 2 listed buildings and impact on conservation area. Development of this area could harm elements which contribute to the significance of these designated heritage assets.

12. Impact on village character:

- Development would threaten the village setting. Character of the village would be lost.

13. Impact on the landscape and views:

- Development will have a huge impact on the landscape and on the wider landscape, and views would be ruined. Prominence of the hillside location would change image of the village significantly.
- Open views over to Thornton Viaduct and Queensbury would be ruined.

14. Topography:

- Site is unsuitable to develop due to its topography.

15. Impact on public rights of way:

- The Bronte Way is a long distance trail used by people unfamiliar with the area, people could get lost if this area becomes a building site. The developers should leave the path safe and accessible for as long as possible, put in place clearly signed diversion, brief workers on pedestrian access, put up signs to warn construction vehicles of pedestrians.
- Overused footpaths already in poor condition.
- The Bronte way runs through the site and is a key public footpath, well used by locals and is a tourist asset which needs protection. Ancient right of way should be retained. This part of the route will end up being the back of a housing estate (obstructing views of the Pinch Beck Valley). It is of high cultural significance and provides important economic benefit to local businesses. Development will impact on this Green Infrastructure corridor. The views and setting of this part of the Bronte Way will be destroyed.

16. Land supply:

- The plan should look at land which will cause the least impact (there are plenty of brownfield sites) (including the burnt down Prospect Mill site) or look at filling the hundreds of empty buildings around Bradford and in the City Centre. Build affordable houses in an area which doesn't affect the natural beauty of this area.

- There are more appropriate areas for a housing development than right in the centre of existing settlements.
- Thornton already has many new houses.

17. Proposed density/level of development:

- The proposal involves too many houses. Provision of a few houses on the roadside using suitable materials could be acceptable. Reduce the number of houses to 20 and site them along Thornton Road.
- Lack of clarity over the number of dwellings to be developed on the site 50 or 150?
- Site should only accommodate 75 dwellings due to landscape impact of northern part of site.
- Not opposed to housing in general.
- Development of this site could lead to other developments and Thornton becoming part of the urban sprawl of Bradford losing its village identity. Site will lead to over development of the village.

18. House prices:

- Building these houses will see house prices go down in the village. It will make it difficult to sell houses.

19. Affordable housing provision

- Plan is about profit not providing suitably sited affordable housing.
- Request to be put on the list for a house.

20. Development of greenfield/Green Belt land:

- The site is Green Belt and therefore protected.
- Green Belt policy is inconsistent. Development should be in areas where it is less seen. Breen Belt development is suggested on oneside of Bell Chapel Churchyard but not on the other.

21. Development of agricultural land

- Too much farm land being built on in Thornton. Site should be left as grazing.

22. Impact on livestock

- Development will lead to an increased threat to livestock from 'out of control' dogs.

23. Suitability of location

- Some development along the frontage of Thornton Road may be acceptable. But high density housing up the hillside is not appropriate.

24. Potential construction issues

- Pile driving at other development sites in the area has caused damage to existing properties. This could happen again with the development of this site.

25. Impact on local economy and tourism:

- Development on this site make no economic or cultural sense.
- Impact on tourism - experiencing the moors and countryside between Thornton and Haworth will be ruined by this development. Tourists will be put off/reduced tourist attraction and will be disastrous for the local economy. Tourism in the area should be encouraged.

26. Impact on council services

- Council struggle to maintain the village at its current size. How will they manage if it increases in size?

Support:

1. Impact on ecology / biodiversity / landscape character:

- Development will look to protect and enhance the biodiversity and landscape character of the Pinch Beck Valley and Great Northern Railway Trail, Bronte Way and cultural associations of the Bronte landscape.

2. Community

- Support for the allocation of site as it will create a new integrated community in the west of Thornton.

3. Design of development

- Support for the site is dependent on the type and quality of the houses proposed.

4. Deliverability

- No know viability issues and no environmental constraints which cannot be dealt with through appropriate design.

Comments:

1. Impact on open / green space:

- Support for the site as it continues protection of important areas of open space (Thornton Cemetery, recreation ground) and looks to increase the provision of parks, play areas and allotments where possible.

2. Flooding/drainage:

- Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 173, 637, 656, 670, 744, 757, 761, 772, 773, 800, 801, 812, 904, 910, 914, 959, 1003, 1004, 1005, 1009, 1014, 1025, 1031, 1033, 1036, 1038, 1043, 1045, 1046, 1068, 1069, 1072, 1081, 1117, 1118, 1119, 1129, 1134, 1145, 1171, 1221, 1238, 1254, 1310, 1317, 1357, 1382, 1402, 1404, 1416, 1531, 1552, 1601, 1618, 1850, 1859, 1960, 2086, 2151, 2211, 2389, 2503, 2551, 2568, 2572, 2655, 2742, 2827, 2979, 2997, 3024, 3046, 3081, 3083, 3089, 3145, 3178, 3183, 3214, 3240, 3469, 3500, 3526, 3936, 4183, 4197, 4213, 4379, 4483, 4513, 4564, 4566, 4647, 4758, 4759, 4978, 5012, 5030, 5159, 5171, 5199, 5204, 5239, 5608, 5861, 5876, 5896, 5962, 12370, 13361, 15448, 18021, 21645, 21650, 21655, 28661, 28758, 29448, 29919

TH3/H: Thornton Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH3/H: Thornton Road	16	16	9	5	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Impact on local infrastructure • Impact on the local highway network • Impact on ecology / biodiversity • Impact on open / green space • Use of brownfield land • Design of development • Proposed housing density / scale of development • Flood risk/drainage • Impact on heritage • Impact on public rights of way • Design of development • Impact on open / green space • Location of development	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1320 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Objections:

1. **Development of Green Belt/greenfield land:**
   - Site is Green Belt and would adversely affect the village. Green Belt sites should not be developed.

- Green Belt function is limited and there are well defined physical boundaries. The site is well related to the road frontage. Site adjoins a number of listed buildings. Evidence suggests 15 dwelling capacity is acceptable.

2. Impact on local infrastructure:

- The development will have an impact on infrastructure. There is no capacity at doctors/dentist to support new housing.

- Local Infrastructure e.g. schools, medical centre, dentist, cannot cope with an increase in population.

3. Impact on the local highway network:

- The development will cause an increase in traffic which will lead to congestion particularly at peak times.

4. Impact on ecology / biodiversity:

- The development will have an impact on protected habitats.

5. Impact on open / green space

- Development would lead to loss of key open spaces and traditional character of the public realm.

6. Use of brownfield land:

- Brownfield land and old mills should be used and not green belt. Empty homes should be filled instead of building new ones.

7. Design of development:

- If the homes were bungalows with green roofs and not visible from the other side of the valley, the development could be supported.

8. Proposed housing density / scale of development:

- Supportive of smaller developments.

9. Flood risk/drainage:

- Increase water runoff risk affecting lower buildings and roads. Reduce capacity of land to absorb water.

10. Impact on heritage:

- Site is close to heritage assets of great historic importance - Thornton Hall, Thornton Farm and the Bell Chapel. Impact on cultural significance would have a negative impact.
- The site adjacent to the Grade II* listed Thornton Hall and other Grade II listed structures. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be a adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or

reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.

11. Impact on public rights of way

- The development will have an impact on the Bronte Way and views across the valley. These walks should be protected.

Support:

1. Design of development:

- Any development at this site should be of a very high standard of design and quality of materials.

2. Impact on open / green space

- Site is not really 'green space' and could be developed.

3. Location of development

- This site is a suitable place to build new property.

Comments:

1. Flood risk/drainage:

- Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 586, 1082, 1094, 3021, 3092, 3146, 4664, 5022, 5160, 5227, 5250, 5360, 5477, 28759, 29449, 29920

TH4/H: Hill Top Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH4/H: Hill Top Road	16	16	11	3	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on surrounding area/community • Impact on local infrastructure • Impact on the local highway network • Proposed density/level of development • Topography • Development of Green Belt/greenfield land • Impact on the countryside • Impact on the landscape • Impact on ecology / biodiversity • Impact on green infrastructure • Flood risk / drainage • Impact on heritage • Impact on public rights of way • Increase in pollution • Impact on the local economy • Sustainability of the location • Provision of open / green space	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1321 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Impact on surrounding area/community: • Village will become commuter belt with residents not actively engaged in the community.
2. Impact on local infrastructure: • Poor bus service and poor access to local amenities, schools, medical centre, dentist and impact on the capacity of those amenities.
3. Impact on the local highway network: • Access from the west - Keelham school is already busy at peak times. • Increase of traffic along Hill Top Road causing congestion. • Hill Top Road is narrow and further parking problems would be caused.
4. **Proposed density/level of development**: • The number of houses for Thornton is disproportionate to other South Pennine Villages. Why use green space?
5. Topography • Site has steep topography and is unsuitable.
6. Development of Green Belt/greenfield land: • Green Belt should not be used. Brownfield sites and derelicts mills in the city centre should be used.
7. Impact on the countryside: • Concerns about impact on the countryside. • Urban sprawl will mean no countryside left to enjoy. Impact on countryside and Bronte landscape.
8. Impact on the landscape: • Site well related to the village with good road frontage but development will be highly visible from South. Site could support 6 dwellings on site frontage to ensure no adverse landscape impact.
9. Impact on ecology / biodiversity: • Flora and fauna, protected species/habitats would be compromised. Impact on nearby honey farm.

- The site is within 7km of the SPA/SAC.

10. Impact on green infrastructure:

- The site is within a Green Infrastructure corridor.

11. Flood risk / drainage:

- Drainage would require extensive work to deal with surface water. Increase water runoff risk affecting lower buildings and roads. Reduce capacity of land to absorb water.

12. Impact on heritage:

- Impact of site on adjacent Grade II listed buildings, and impacts of overlooking. Destruction of heritage/unique character of village.
- Site is located opposite Grade II listed terrace. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be a adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.

13. Impact on public rights of way:

- Concerns about impact on public footpaths and in particular the Bronte Way.

14. Increase in pollution:

- Concerns about pollution.

15. Impact on the local economy:

- Negative impact on local economy as village will attract less visitors/walkers.

16. Sustainability of the location:

- Houses should be built in areas where cars are not needed. People will not walk to the village on a regular basis from this site.

Support:

1. Provision of open / green space:

- Support for creation of an integrated new community. Continued protection for important areas of open space. Opportunities to increase provision of parks, play areas and allotments.

Comments:
1. Impact on ecology / biodiversity: • Concerns about the impact on wildlife. • Development will protect and enhance biodiversity and landscape character, and heritage of Thornton.
2. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.
3. Deliverability: • No known viability issues. No environmental constraints that cannot be dealt with via appropriate design.

Representation IDs: 1075, 1083 ,3027, 3545 ,4270 ,5153 ,5162, 5230, 15449, 21646 ,21651, 21656, 28662, 28760, 29450, 29921

TH5/H: Hill Top Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH5/H: Hill Top Road	20	20	18	0	2

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of greenfield land • Impact on the local highway network • Proposed site access point • Impact on local infrastructure • Impact on ecology / biodiversity • Impact on Green Infrastructure • Impact on the landscape • Flood risk / drainage • Impact on heritage • Impact on public rights of way • Retain in existing use • Suitability of the site / alternative use • Impact on the local economy • Deliverability	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1322 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Development of greenfield land:

- Unnecessary destruction of greenfield when brownfield/ derelict site/ empty homes should be used first.

2. Impact on the local highway network:

- Already sufficient houses and cars in this area. Building a new junction for 10 houses would be disruptive.
- There is too much traffic in the Hill Top Area.
- Site does not have adequate road structure to support development. Peak time traffic would be hazardous for pedestrians at this pinch point. Increase traffic leading to congestion. Impact on further road network at West Lane, James Street and Wicken Lane.
- Adequate parking would need to be provided given existing problems on Hill Top Road.
- Accessing the site from the south through the masterplan area would seriously affect safe access to the park and play area.

3. Proposed site access point:

- Access into the site is an issue. Gradient of new road would be dangerous in winter.
- The site should not be allocated due significant access constraints.

4. Impact on local infrastructure:

- Facilities such as schools, doctors, dentist, public transport are already inadequate.

5. Impact on ecology / biodiversity:

- Concern about impact on wildlife.
- Impact on protected bat species which are present in the derelict barn.
- The site is within 7km of the SPA/SAC.
- The site should not be allocated due to extensive tree coverage.

6. Impact on Green Infrastructure:

- The site is within a Green Infrastructure corridor.

7. Impact on the landscape:

- Development would have a moderate impact on the landscape.
- Site would affect view of properties overlooking the valley and hillside.

8. Flood risk / drainage:

- There are springs underneath this site.
- Increased risk of water run-off affecting buildings lower down the hillside due to reduced capacity of land to absorb water.

9. Impact on heritage:

- Impact on the heritage buildings surrounding the site. Including Grade II listed buildings.
- Site is located adjacent to several Grade II Listed buildings along Hill Top Road. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be a adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.

10. Impact on public rights of way:

- The Bronte Way runs through the site. Concern about impact on public pathways and cultural significance.
- The site should not be allocated due to the public right of way crossing the site.

11. Retain in existing use:

- The site would be better retained as grazing land. Horses are currently grazed on this site under license.

12. Suitability of the site / alternative use:

- Site is sloping and unsuitable for residential housing. Includes open fields and a dilapidated dwelling. Other uses for the site such as tree planting or allotments would benefit the community.

13. Impact on the local economy:

- Development will undermine Thornton Village's identity/ negative impact on the local economy. Bronte birth place should be promoted not hindered by the building of houses along the route.

14. Deliverability

- Issues regarding land availability. The house and barn are privately owned and owner does not want to sell.
- Land being rented from the Council to local individuals for garages and allotments. Council meet their obligation to sell to occupiers first.

Support:
No representations received in support.
Comments:
1. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 174, 589, 1041, 1076, 1143, 1390, 1534, 1785, 3032, 3087, 3149, 3537, 3561, 5165, 5178, 5215, 15450, 28761, 29451, 29922

TH6/H: Dole and Prospect Mills, Thornton Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH6/H: Dole and Prospect Mills, Thornton Road	16	16	7	6	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on the local highway network • Impact on local infrastructure • Potential contamination • Impact on ecology / biodiversity • Impact on heritage • Impact on village character • Proposed density/level of development • Alternative use • Development on Brownfield land • Design of development and use of materials • Impact of pollution	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1323 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Impact on the local highway network: • Development of the site will cause and increase in traffic which will lead to congestion.
2. Impact on local infrastructure:

- Facilities such as schools, doctors, dentist, public transport are already inadequate.

3. Potential contamination:

- The site is potentially contaminated by DDT, lindane, dieldrin and other hazardous organochlorine pesticides which are poisonous. If decontamination is unsuccessful this could lead to exposure to future residents.
- The mill reservoir on Thornton Road was filled in with unrecorded waste material.

4. Impact on ecology / biodiversity:

- The site has become a thriving informal nature reserve and should remain as such.

5. Impact on heritage:

- Proposed building works seem contrary to the Conservation Area Appraisal which looks to maintain historic features and details and limit the loss of character and key open spaces.
- The site is within Thornton Conservation Area and contains the Grade II listed buildings of 285 and 287 Thornton Road. Site is also adjacent to other Grade II listed buildings along Prospect Street and also Ashfield House. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be a adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.

6. Impact on village character:

- Development will spoil a beautiful section of the Bronte Way and the Thornton village's identity.
- Destruction of unique character of the village.

7. Proposed density/level of development:

- Further detailed consultation on the future of the site is required. 50 dwellings seems excessive. A sensitively scheme developed with local residents could be supported.

8. Alternative use:

- Site would be better used for a new community facility such as a doctor’s surgery/library/community centre.
- Site should be anchored by a care home with a new larger doctor’s surgery. A mill style building could be reinstated.

Support:
1. Impact on ecology/biodiversity: • The site is now a wild habitat. Consideration should be given to leaving some of the land as wild habitat for endangered species.
2. Development on Brownfield land: • The redevelopment of the site should be a priority over sites on Green Belt land.
3. Design of development and use of materials: • Terraced properties on the edge of the site must be preserved. Character of these properties must be preserved. Good quality materials and well-designed housing is required. • Consideration should be given to using suitable materials as the site is part of the conservation area.
4. General support: • Support for redevelopment of the site but with some concerns. Currently an eye sore. Site should be developed immediately.
Comments:
1. Impact on ecology / biodiversity • Concern about impact on wildlife/nature.
2. Flood risk/drainage: • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. There should be a 30% reduction in surface water discharges, or restricted to Greenfield rates. There should be no increase in brownfield surface water discharge post-development. SuDs design principle should apply.
3. Impact of pollution: • Concern about increased pollution.
4. Impact on public rights of way: • Concern about impact on public pathways.
5. Deliverability of the site

- Brownfield site within village limits and good road frontage. Site contains former mill pond. 50 dwelling capacity deliverable but deliverability uncertain due to contamination and ecological issues.

Representation IDs: 584 ,1077, 1389 ,1973 ,3164 ,3177 ,4438 ,4680 ,4831, 5170 ,5220, 5252, 5588, 28762, 29452, 29923

TH7/H: Old Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH7/H: Old Road	7	7	1	3	3

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Suitability of the site • Flood risk/drainage • Impact on public rights of way	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1297 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Objections:

1. **Development of Green Belt/greenfield land:**
   - Green Belt should not be used. Use brownfield and derelict mills.

Support:

1. **Suitability of the site:**
   - Suitable site. Would have little impact on heritage or habitat. Good access to public transport.

Comments:

1. **Suitability of the site:**
   - This is a small site within built up limits, with limit capacity.
2. **Flood risk/drainage:**

• Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. There should be a 30% reduction in surface water discharges, or restricted to Greenfield rates. There should be no increase in brownfield surface water discharge post-development. SuDs design principle should apply.
3. Impact on public rights of way: • Concern about the potential impact on public path ways.

Representation IDs: 1078, 1087, 1974, 3165, 5233, 28763, 29924

TH9/H: Hill Top Road, Close Head Drive

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH8/HC: Thornton Road West	19	19	12	2	5

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Objection to site allocation • Impact on local character • Impact on wildlife • Impact on green belt • Flood risk	Since the consultation on the Regulation 18 Local Plan was undertaken, this site now has extant planning permission

Summary of Representations
Objections:
1.**Object to site allocation**
2. **Lack of local services and amenities** • No shops, public services or school places
3. Impact on local character • Impact in rural character
4. Impact on wildlife • Fields are full of birds, foxes, sheep and wildlife
5. Green Belt • Object to use of green belt

6. Flood risk • Increase in surface water run off
Support:
1. Suitable site • Site suitable providing enough green space for green corridor
Comments:
1. Flood risk • Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. There should be a 30% reduction in surface water discharges, or restricted to Greenfield rates. There should be no increase in brownfield surface water discharge post-development. SuDs design principle should apply.
2. Proximity to National Grid asset • Site is crossed in or close proximity to National Grid asset

Representation IDs: 1088, 1391 ,1979, 2088, 2153, 3035, 3076 ,3169, 5217, 5237, 5318, 12317, 13363, 15451, 17301, 19899, 27743, 28764, 29925

TH9/H: Hill Top Road, Close Head Drive

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH9/H: Hill Top Road, Close Head Drive	12	12	11	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on surrounding area / amenity /community • Impact on the local highways network • Proposed access point • Development of Green Belt/greenfield land • Impact on local infrastructure • Impact on ecology / biodiversity • Impact on green infrastructure • Impact on the landscape • Impact on village character • Flood risk / drainage • Impact on public rights of way • Provision of affordable housing • Housing standards • Impact on the local economy	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1324 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations

Objections:

1. **Impact on surrounding area / amenity /community:**

3. New development would back on to houses on the existing estate, would overlook gardens, would reduce house prices.

2. Impact on the local highways network: 4. Increased traffic leading to congestion. Rural roads not suited to increased traffic.
3. Proposed access point: 5. Close Head Drive not wide enough for additional traffic.
4. Development of Green Belt/greenfield land: • The site is an open field in agricultural use and performs an important Green Belt function**.** • Green Belt should not be used. Use brownfield and derelict mills.
5. Impact on local infrastructure: • Local infrastructure is unable to cope with the increased demand as a result of new development including: roads, schools, doctors, dentist, public transport, limited leisure facilities.
6. Impact on ecology / biodiversity: • Development of the site will have an impact on environment and wildlife in the field. • The site is within 7km of the SPA/SAC.
7. Impact on green infrastructure: • The site is located within a Green Infrastructure Corridor.
8. Impact on the landscape: • The development would have a high landscape impact.
9. Impact on village character: • Development would have a damaging effect on the rural character of Thornton. Particularly in combination with adjacent sites (TH1/HC, TH10/H, TH11/H).
10. Flood risk / drainage: • Water already flows from this field and would flood existing gardens if it were developed. Increased risk of water run-off.
11. Impact on public rights of way:

- The Bronte Way runs along this site. This is a main tourist attraction and should be treasured and improved. Should not be building on any part of the historic way.

12. Provision of affordable housing

- The housing to be provided will not be affordable.

13. Housing standards:

- The Council should adopt building standards to comply with insulation standards at Passiv House/carbon neutral level. Although this may be uneconomic in the city, grants could be used. It would be less of an issue in more affluent rural areas. It would make Bradford an environmentally aware/climate-responsive city.

14. Impact on the local economy:

- The development of the site will have a negative impact on the local economy – with the village becoming less attractive to visitors.

Support:

No representations received in support.

Comments:

1. Flood risk/drainage:

6. Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. There should be a 30% reduction in surface water discharges, or restricted to Greenfield rates. There should be no increase in brownfield surface water discharge post-development. SuDs design principle should apply.

Representation IDs: 774, 1049, 1089, 3036, 5240, 5289, 8153, 12371, 13357, 15452, 28765, 29926,

TH10/H: Hill Top Road, near Ring O' Bells

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH10/H: Hill Top Road, near Ring O' Bells	13	12	12	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Impact on the local highway network • Impact on local infrastructure • Topography • Impact on ecology / biodiversity • Impact on green infrastructure • Impact on the landscape • Impact on heritage • Impact on village character • Flood risk/drainage • Impact on public rights of way • Impact on the local economy	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1317 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations

Objections:

1. **Development of Green Belt/greenfield land:**
   - Green Belt should not be used. Use brownfield and derelict mills.

2. Impact on the local highway network: • Concerns about increased traffic and congestion. Hill Top Road not suitable for more traffic coming from the village.
3. Impact on local infrastructure: • Thornton medical centre and school are already unable to cope with the number of residents. Impact on these services from additional population. Poor access to these services due to poor bus service and steep topography.
4. Topography: • Steeply sloping site with access constraint and poorly related to the village. Site should not be allocated.
5. Impact on ecology / biodiversity: • The site is within 7km of the SPA/SAC. • The site is in close proximity to protected habitat.
6. Impact on green infrastructure: • The site is located within a Green Infrastructure Corridor.
7. Impact on the landscape: • Development would have a moderate impact on the landscape.
8. Impact on heritage: • Site is adjacent to a Grade II listed building. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be a adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.
9. Impact on village character: • This area is part of a beautiful section of the Bronte Way. The rural setting of this area will be lost forever by this development. • Development will stop Thornton reclaiming its village identity. Destruction of unique character and heritage. Development would have a damaging effect on the rural character of Thornton. Particularly in combination with adjacent sites (TH1/HC, TH10/H, TH11/H).
10. Flood risk/drainage:

• There will be increased surface water flood risk affecting lower buildings and roads if the site is developed.
11. Impact on public rights of way: • This area is a walking route for the community. Development would increase traffic and cause a safety issue.
12. Impact on the local economy: • The development of the site will have a negative impact on the local economy – with the village becoming less attractive to visitors.
Support:
No representations received in support.
Comments:
1. Flood risk/drainage: 7. Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. There should be a 30% reduction in surface water discharges, or restricted to Greenfield rates. There should be no increase in brownfield surface water discharge post-development. SuDs design principle should apply.

Representation IDs: 875, 1090, 1392, 3037, 3172 ,5173 ,5242, 5293, 13358, 15453, 28766, 29490, 29927

TH11/H: South of Hill Top Road and East of Close Head Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
TH11/H: South of Hill Top Road and East of Close Head Lane	16	15	14	1	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development of Green Belt/greenfield land • Impact on the local highways network • Impact on local infrastructure • Topography • Impact on ecology / biodiversity • Impact on green infrastructure • Impact on the landscape • Flood risk / drainage • Impact on public rights of way • Use of brownfield land • Increases in emissions • Impact on village character • Impact on the local economy	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1318 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements

Summary of Representations
Objections:
1. Development of Green Belt/greenfield land: • Green Belt should not be used. Use brownfield and derelict mills.
2. Impact on the local highways network: • Access from Keelham already too busy with lorries**.** • Access to houses and services will be by car, increasing congestion. • No suitable public transport. • The wider combination of sites will cause increased traffic on an already busy road - leading to congestion. Access track not suitable for vehicular access.
3. Impact on local infrastructure: • Impact on the doctors, schools, dentists, public transport, limited leisure facilities. Poor accessibility to these services due to poor bus service, steep topography and distance to services.
4. Topography: • The site has a moderate slope.
5. Impact on ecology / biodiversity: • The site is located within 7km of the SPA/SAC. • Development of the site will have an impact on protected habitats.
6. Impact on green infrastructure: • The site is located within a Green Infrastructure Corridor.
7. Impact on the landscape: • Development would have a moderate impact on the landscape / Bronte landscape. • Site is an agricultural field and development would encroach into the countryside and have an adverse landscape impact. Site should not be allocated.

8. Flood risk / drainage:

- Increased risk of surface water run-off affecting lower buildings/roads.

9. Impact on public rights of way:

- The area is a popular walking route, particularly the Bronte Way. Development will impact on road safety.

10. Use of brownfield land:

- Other brownfield sites in the village should be considered.

11. Increases in emissions:

- Development not conducive to reduction in emissions.

12. Impact on village character:

- This site and adjacent sites will ruin the rural character and destroy the village identity and heritage.

13. Impact on the local economy:

- The development of the site will have a negative impact on the local economy – with the village becoming less attractive to visitors.

Support:

1. General impact of development:

8. Debatable whether the development of the site is unlikely to have a significant effect.

2. Design of development:

9. A sensitive design incorporate green infrastructure will be required to mitigate impacts to existing corridor and landscape.

Comments:

1. Flood risk/drainage:

10. Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. There should be a 30% reduction in surface water discharges, or restricted to Greenfield rates. There should be no increase in brownfield surface water discharge post-development. SuDs design principle should apply.

Representation IDs: 175, 876, 1091 ,1393, 3038 ,3171, 3549, 5176, 5245, 5276, 5294, 8154, 13359, 15454, 28767, 29928

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 139 within the consultation document.

Summary of Consultation

A total of 15 representations were received in relation to Question 139 from 14 respondents. Respondents included Highways England, local residents, a housebuilder and agents. **Table 95Error***! No text of specified style in document.***.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 95.6**.

Table 95 Error! No text of specified style in document.**.5: Consultation Question 139: Thornton Preferred Site Allocations - Overview of Representations Received -**

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q139	15	14	16	0	1

Table 95.6: Summary of Representations Received - Q139: Thornton Preferred Site Allocations

Thornton Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Housing • Highways • Green Belt • Brownfield • Environment • Heritage • Alternative sites	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy TH1: Thornton, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

• Landscape • Infrastructure/Amenities • Health • Economy • General comments • Impact on the highway network	

Summary of Representations
Objections
1. Housing • There is a need for affordable housing. • Eco-homes should be developed better for environment. • would support greater use of the land designated TH8/HC and further along the lefthand side of Thornton Rd, which scenery could be enhanced by sympathetic housing. • need to utilise empty homes before building on green fields. • The Dole and Prospect Mills site has been badly managed for many years. • New properties design not in line with character of place • 10% discount on non-implementation is an under-estimate. Number of dwellings for Thornton is likely to be lower. Allocations would not meet housing targets.
2. Highways • Increase in footfall and traffic • Not thought that individual sites on their own will negative affect the strategic road network (SRN) the cumulative impact of sites within the plan could severely affect the SRN. The cumulative impact will need to be established by CBMDC and Highways England
3. Green Belt • Green belt should be removed and protected and brownfield developed first. • Too many houses proposed on greenfield/ Green Belt land • Destruction of Green Belt

- Disagree with conclusion that site TH/013 has major potential impact on Green Belt particularly encroachment given its size, disposition and associations with settlement and development to the south , north west and due to topographical changes to the east. Wider Green Belt is crossed by pylon lines and other infrastructure.
- the selected Green Belt Methodology that this criterion relating to the preservation of the setting and special character of historic towns has been misapplied and is not relevant to the Bradford District context.

4. Brownfield

- Brownfield sites have not been developed
- Some of the proposed greenfield and brownfield sites are subject to a variety of constraints and/or environmental requirements to accommodate reducing their combined capacity by around 100 dwellings.

5. Environment

- Too close to protected habitats
- Increased threat to livestock from 'out of control' dogs. Increased volume of dog faeces fouling local footpaths, pavements and other habitats.

6. Heritage

- Housing will negatively impact heritage and the Bronte Way
- Destruction of heritage and character

7. Alternative sites

- There are alternative sites which could preserve the green corridor and preserve Thornton Valley and wildlife; Ol Dr meets Thornton Road, Leaventhorpe Hall, Thornton Road meets Belle Dene
- Objection to the omissions of land at Thornton Road and Green Lane, Thornton (Site TH/007) from the Preferred Options Draft Plan. Site could deliver 75 homes and 2 affordable homes. Site does not perform Green Belt functions and has no environmental constraints.
- Rejected site TH/013 Spring Holes Lane for a development of 58 dwellings. This site would contribute to an enhanced requirement in Thornton (800 to 825 dwellings).
- Relationship of site TH/013 with Thornton Recreation Ground to the south west and the sports fields to the west presents opportunities for environmental improvements and appropriate landscaping.
- Disagree with the SA assessment against criterion 3 -Land and Buildings as the loss of a relative small area of greenfield

land does not justify a major adverse impact rating for site TH/013

- Promoting site off North Cliffe Lane, Thornton - insufficient land had been identified in the plan for housing development. This site has been promoted previously.
- Allocation of land for housing must be in accordance with the plan's Strategic Policies on the housing requirement and spatial distribution. Policies SP1, SP2, SP3, SP4, SP5 and SP8 - justify growth, apply a sequential approach. 3 sites in Thornton have been identified for being released from the Green Belt.
- Site TH/022 meets the policy requirements set out in the plan and should be allocated for housing.
- TH/022 site represents an opportunity for allocation within a Local Growth Centre in accordance Polices SP1-3, SP5 & SP8.Site is located in a Local growth Centre. Site is well related to built area. Site preforms little Green Belt function. Site is sustainably located, has no technical infrastructure reasons to not meet housing target. Site makes no contribution to openness, site has strong boundaries, will not lead to any towns merging, separated from urban edge by mature trees. The site will have no impact on heritage, assist in urban regeneration, does not affect character of the area, related to existing development, no trees within main body of site, buffer will be required to retain setting of listed building, site is available and deliverable, site satisfies release criteria.
- The draft plan is currently unsound and it is requested that Site TH/022 be a preferred allocation for development.

8. Landscape

- Protection for Bronte way path as part of the green corridor.
- Bronte Way is a national treasure should build elsewhere in the City

9. Infrastructure/Amenities

- Amenities such as allotments should be mandated where possible
- GP oversubscribed
- School overcrowded
- Increase in footfall and traffic
- Lack of local infrastructure - schools, dentist, public transport etc

10. Health:

- Detrimental to mental health - footpath good for exercising

11. Economy

- Thornton on way to be a tourist hotspot - development will destroy this and damage economy
- Impact on economy over loss of tourism from walking groups

12. General comments

- Debate over policy wording "Development at this site would be unlikely to result in a significant effect, either positive or negative"
- Council support to local residents has been poor. Need to listen to local residents and have further consultation
- If the development is appropriate and sensitive to local residents and the local area as a whole then I would not object. 50 homes is excessive.
- Reducing village to 'commuter' belt where majority of new residents are not actively engaged in the community.

Support

No comments in support received

Comments

1. **Impact on the highway network**:
   - Not thought that individual sites on their own will negative affect the strategic road network (SRN) the cumulative impact of sites within the plan could severely after the SRN. The cumulative impact will need to be established by CBMDC and Highways England

Representation IDs: 170, 489, 1079, 1380, 2085, 2540, 3091, ,4389, 4830, 5148, 5191, 10956, 11826, 15528, 29818, 29911, 30219

2.96 WILSDEN

Introduction

The Local Plan settlement hierarchy identifies Wilsden as a Local Service Centre. This means that it will see a smaller scale of development, comprising both market and affordable housing, as well as the protection of its local centre to help ensure the continued provision of economic activity in the area. Based on this the settlement has a housing target of 125 dwellings. A total of three site allocations are proposed to deliver these development requirements.

Portrait & Local Area Strategy

The Local Plan provides a portrait of Wilsden's characteristics and sets out a Local Area Strategy for its future growth and development, whilst supporting local services/facilities as well as enhancing the natural and built environment, and provision of infrastructure. This was listed as consultation question 140 within the Preferred Options document and the on-line consultation portal. The portrait and Local Area Strategy can be viewed on the Council's website.

Summary of Consultation

A total of **23** representations were received in relation to the Wilsden portrait and Local Area Strategy (Question 140) from **23** respondents. Respondents included, Highways England, the Great Northern Railway Trail Development Group, local residents, a developer, the Parish Council and a Ward Councillor. **Table 96.1** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in **Table 96.2**.

Table 96.1: Consultation Question 140: Wilsden Portrait & Local Area Strategy - Overview of Representations Received -

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
140	Wilsden Portrait & Local Area Strategy	23	23	18	1	4
	Totals	**23**	**23**	**18**	**1**	**4**

Table 96.2: Summary of Representations Received - Wilsden Portrait & Local Area Strategy

Wilsden Portrait & Local Area Strategy

Question Number	Reference	Number of Representations	Number of Respondents	Object	Support	Comment
140	Wilsden Portrait & Local Area Strategy	23	23	18	1	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on local infrastructure/services • Brownfield • Highways • Housing • Environment • Flooding/drainage • General comments	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy WI1 Wilsden, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

Summary of Representations
Objections
1. Development on Green Belt land: • Green Belt should be removed from plan and brownfield developed first • Should not develop on Green Belt • Prime Minister's "Build Build Build" announcement on 30/6/2020 said brownfield building would be made easier to

protect Green Belt.

- Should not deplete Green Belt over Previously Developed Land
- Wilsden Parish has several sites (Haven Farm and Prospect Mill) which are large and capable of accommodating 100+ dwellings. Add to site which is PDL (WI1/H),would provide all the necessary numbers without having to resort to deletions of the Green Belt.
- object to building on Green Belt because it has an adverse effect on the landscape, scenery and wildlife of the area.

2. Impact on local infrastructure/services:

- Broadband speeds do meet required standard.
- GP's and schools are overcrowded
- More houses will put strain on local services
- Poor infrastructure, current infrastructure cannot cope

3. Brownfield

- Brownfield sites have not been developed

4. Highways

- Traffic is very busy
- Roads are too narrow
- Traffic would pose a risk to environment and people
- Royd St by the co-op is one lane for 2 way traffic due to cars parked on both sides of the road.
- Increase in traffic congestion
- one road in and out of the village and the school drop off and pick up creates dangerous traffic situations
- Crack Lane is horrific, used as a shortcut with traffic and more housing will increase risk of accident
- Royd Street is terrible for traffic without an increase in car numbers
- Crack Lane already dangerous and congested
- Number of dwellings will overburden area and create parking and access issues
- Residents already feel
- the B6144 from Cullingworth and Main Street/Harden Road are similar to race tracks with scarce police resources

- Increase in volume of cars

5. Housing:

- Housing will not be affordable
- Increasing housing will not be beneficial for village
- Areas are not fit for more development
- 3 Houses bottom of Royd Street that already have foundations built also not included
- There are abandoned developments and development opportunities that could and should be utilised in preference to any greenfield developments.
- Generally support CBMDC's strategy for Wilsden but Wilsden should be identified for greater growth more than 125 dwellings over plan period
- The 130 more homes envisaged in the plan include WI1/H & WI3/H. Existing sites have been approved for housing, so this refutes the excuse to build on greenbelt at WI2/H.

6. Environment

- Use Government grant to assist conversion of PDL saving farming and open spaces

7. Flooding/drainage

- Significant flooding on Crack Lane caused by insuffcient drainage of water in surrounding fields overwhelms the roads along Shay and Crack Lane
- Flooding is a major problem, high natural spring, clay soil
- Issue with water tank under business unit

- **Alternative sites:**
- Bradford should not use Greenbelt should use Brown sites first - Such as Prospect Mill and Haven Farm the old chicken factory.
- a mill in the village that proposes to turn into apartments and other housing is not in the plan
- land behind the pharmacy may be greenfield, but serves no benefit or purpose, being essentially wasteland.
- Brownfield sites at Haven Farm, Station Road, Harecroft and Prosepct Mill, Main Street are ideal.

8. General comments:

- Village is overcrowded
- Village needs leaving alone. Getting ruined by development.
- Expansion of village boundary overall and further urbanisation.

  the existing number of dwellings have been underestimated and is based on old data.
- Higher growth will ensure sustain ability objectives can be achieved, sustaining and enhancing local services and facilities and growing local employment.
- Greater level of growth will provide great community opportunities and sustainable transport infrastructure within the Local Service Centre
- Wilsden needs more construction not more houses

Support

1. **General Comment**
   - Wilsden Parish Council has commented on the source and scope of the data used to prepare the 5.27 local area strategy. We have also made a number of comments and corrections on the detail of 5.27.

Comments

1. **Impact on highway network:**
   - Not thought that individual sites on their own will negative affect the strategic road network (SRN) the cumulative impact of sites within the plan could severely affect the SRN. The cumulative impact will need to be established by CBMDC and Highways England
   - Main Street is a busy congested road, with a lack of parking. Two cars can't pass safely side by side.
2. **Impact on local infrastructure/services:**
   - reference to be made of need to connect Wilsden to the Great Northern Railway Trail at Harecroft as part of the overall route to connect Cullingworth with Keighley. Has support from Wilsden Parish Council. This would be achieved by a spur link, of which the existing Station Road at Harecroft would form a part.
3. **Housing**
   - Too big development for a small village
   - Wilsden [housing requirement] has been significantly reduced and that the Council has not taken the sensible decision to balance the delivery of homes across Bingley Rural.

4. Employment:

- Wilsden has a shortage of employment sites

5. Alternative site

- SHLAA site on Haworth Road in Wilsden (between The Avenue and Shay Lane) is far more suitable for development than any of the proposed sites in Cottingley and especially the site between Lee Lane and March Cote Lane (CO1/H). The unallocated site in Wilsden is better connected to public transport and the main B6144 that serves Bingley Rural and has the capacity to address several of the village's needs (e.g., a new less constrained primary school) alongside meeting housing requirements for both Wilsden and Cottingley. This single site approach increase chance of early delivery by providing an accessible, greenfield site with established developer interest.

Representation IDs: 11, 490, 2269, 2470 ,2653, 2778, 2907, 3010, 3057, 3125, 3322, 3512,3524, 4207, 4273, 4588, 4840, 15529, 16343, 17303, 19727, 28909, 30121

Sites

As highlighted above, three sites were put forward in the Preferred Options document to meet the proposed development requirements for Wilsden (all 3 for residential). Under consultation question 141 of the document, respondents were able to comment on the sites individually or provide general comments in relation to the sites overall as well as put forward alternative/additional sites.

A total of **111** representations were received in relation to Sites WI1/H to WI3/H from **89** respondents. Respondents included Government bodies (Environment Agency and Historic England), local residents and a Ward Councillor. **Table 96.3** (below) provides a breakdown of the representations by site and by nature of response. The issues raised together with CBMDC's response are set out in **Table 96.4**.

Table 96.3: Wilsden Proposed Sites (WI1/H to WI3/H) - Overview of Representations Received

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
WI1/H: Crooke Lane	12	12	7	4	1
WI2/H: Crack Lane	58	48	57	0	1
WI3/H: Moorside Farm, Wellington Road	29	29	26	2	1
Totals	**111**	**89**	**90**	**6**	**3**

Table 96.4: Wilsden Proposed Sites (WI1/H to WI3/H) - Summary of Representations Received

WI1/H: Crooke Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
WI1/H: Crooke Lane	12	12	7	4	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local infrastructure/services • Impact on local highway network • Housing provision • Impact on heritage • Alternative proposal • Suitability of the site • Proposed density of development • Flood risk/drainage	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1340 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Impact on local infrastructure/services:**
   - There are not enough facilities. Schools, doctors, shops are all overcrowded.
   - The primary school is at capacity.

2. Impact on local highway network:

- The road through Wilsden is very busy. Roads are congested and cannot cope with anymore households.
- Road through Wilsden not suitable for heavier traffic.

3. Housing provision:

- There are already enough houses in the village.

4. Impact on heritage:

- Part of the site is within the Wilsden Conservation Area. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be a adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.

5. Alternative proposal:

- The site at Spencers Mill should be approved instead of this one.
- Alternative sites should be used (Prospect Mill/Haven Farm).

Support:

1. Suitability of the site:

- The site is currently overgrown. It has good access and already has foundations for three houses.
- The proposed number of dwellings will not overburden area/services. Access may be a problem.

2. Proposed density of development:

- Build at a higher density to get more from the site.

Comments:

1. Flood risk/drainage:

- Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. For Brownfield sites there should be a 30% reduction in surface water discharges, or restricted to

Greenfield rates. There should be no increase in brownfield surface water discharge post-development. SuDs design principle should apply.

Representation IDs: 2410, ,4289, 4435, 4515, 4712, 4837, 4883, 5348, 5530, 19731, 28720, 29491

WI2/H: Crack Lane

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
WI2/H: Crack Lane	58	48	57	0	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local infrastructure • Impact on the local highway network • Potential alternative site options • Use of brownfield land • Development of Green Belt land • Potential for sprawl • Design of the development and impact on village character • Impact on air quality • Impact on ecology and biodiversity • Flood risk / drainage • Impact on agricultural / equine land • Impact on heritage • Impact on public rights of way • Design and layout considerations • Impact on green / open space • Land stability issues • Deliverability of the site • Cartographic error	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1341 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations
Objections:
1. Impact on local infrastructure: • Development of the site will have an impact on local shops, school (one form entry), healthcare and services which are at capacity.
2. Impact on the local highway network: • Access/safety to the site would be compromised due to single track/narrow road. Poor vehicle access. Road unsuitable for any extra vehicles. Road would need considerable alteration. This would change the character of this area. Potential for increased accidents. Increase of congestion on main roads in the village. • The site has poor access to public transport.
3. Potential alternative site options: • Alternative sites are available and should be used instead. (e.g. Prospect Mill, Haven Farm).
4. Use of brownfield land: • Brownfield sites should be developed instead.
5. Development of Green Belt land: • Development would impact the openness of the Green Belt. Green Belt should be protected. Expanding into Green Belt will set a precedence. • Requirement for off-site compensatory improvements to the surrounding Green Belt should be removed. • Disagree with the Green Belt Assessment that there will be a moderate impact.
6. Potential for sprawl: • Development of the site will lead to sprawl into the adjacent hamlet.
7. Design of the development and impact on village character: • The dry stone wall should be retained. • Recent developments not been in keeping with the village. Village is losing its identity.

8. Impact on air quality

- The development of this site will have an impact on air quality, affecting mental and physical health of existing residents.

9. Impact on ecology and biodiversity:

- There will be nature conservation issues as a result of the development of this site. Removal of hedgerows and trees will lead to loss of wildlife and impact on habitats, bats etc.
- There is a historic tree on the site which cannot be replaced by new planting. It should be retained.

10. Flood risk / drainage:

- The site suffers from flooding issues (surface water runoff). Development would cause further flooding issues to the adjacent housing and highways. The site acts to absorb water. There is a natural spring on the site.

11. Impact on agricultural / equine land:

- Equine safety - the area houses a number of stables with riders using the highway daily.
- The tenant farmer has already been stopped from using this field for cattle. It was recently a cow maternity field. The country needs farmers/farmland. This move has threatened the livelihood of this farmer.
- Development of the site would result in the loss of grazing land.

12. Impact on heritage:

- Heritage impact on non-designated assets and grade II listed building close to the site. (Particularly Nook House).
- The site is located 150m from Wilsden Conservation Area. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be a adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.

13. Impact on public rights of way:

- Crack Lane is at the junction of two important leisure corridors for walkers, cyclists, horse riders. Any road upgrade would imperil leisure users.

14. Design and layout considerations:

- There should be a commitment to retaining the fields between the plot and edge of the village.

15. Impact on green / open space:

- The development will impact on the adjacent cemetery.

16. Land stability issues:

- Coal mines lie beneath the site.

17. Impact on amenity:

- The development of the site will have an impact on privacy / overshadowing of neighbouring properties.
- Development of the site will cause noise and disturbance from building works.
- The area is not suitable for more housing.

18. Deliverability of the site:

- The site could come forward within 5 years – the timescales should be revised to reflect this.

19. Cartographic error:

- Map provided does not show new housing which has recently been developed.

Support:

No representations received in support

Comments:

1. Flood risk/drainage:

- Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 12, 1712, 1771 ,1948 ,2266, 2292, 2404, 2408, 2468, 2558, 2560, 2561, 2654, 2790 ,3003, 3015, 3029, 3070, 3074, 3080, 3094 ,3519, 3528, 3741, 3743, 3747, 4110, 4187 ,4238 ,4274, 4280, 4302 ,4307, 4313, 4344, 4434, 4514, 4524, 4596, 4667, 4813, 4972, 5054, 5077, 5221, 5235, ,5249 ,5349, 5531, 5751, 5789, 5884, 8133, 16346, 19732, 28594, 28721, 29492

WI3/H: Moorside Farm, Wellington Road

Site Reference	Number of Representations	Number of Respondents	Object	Support	Comment
WI3/H: Moorside Farm, Wellington Road	29	29	26	2	1

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Impact on local infrastructure • Impact on the local highways network • Housing provision • Provision of affordable housing • Development of Green Belt • Development of greenfield land • Use of brownfield land • Design of the development and impact on village character • Impact on the ecology and biodiversity • Loss of agricultural land • Flood risk/drainage • Impact on open / green space • Impact on heritage • Alternative site proposals • Impact on residential amenity • Sustainability Appraisal • General objection	The Council has undertaken a review of the representations and key material planning issues raised, while also undertaking further technical work on plan evidence, impact assessments and follow-up on-site analysis. The site remains a housing allocation and is identified as H1342 in the Regulation 19 Local Plan. The site allocation proforma details key site information and development considerations including policy and infrastructure requirements.

Summary of Representations

Objections:

1. **Impact on local infrastructure:**
   - Additional dwellings will not benefit the village. Impact on services/local facilities/infrastructure capacity e.g. schools, medical practice. No money being spent on new services.

2. **Impact on the local highways network:**
   - Access on to Royd Street from Main Street is narrow. Parked cars and high pedestrian number visiting local amenities. Increased traffic noise. Road network cannot accommodate additional traffic. Not suitable access. Potential for serious congestion. Access hindered by the Coop. At odds with proposed zero carbon future.

3. **Housing provision:**
   - Too many houses in one location. Not required in these small villages.
   - With Crooke Lane and Prospect Mill this site will deliver all needed homes.

4. **Provision of affordable housing:**
   - Housing would not be affordable for young people.

5. **Development of Green Belt:**
   - Land is Green Belt and should be protected. No exceptional circumstances.
   - Topographically it is reasonably hidden from most aspects. Least worse Green Belt option.

6. **Development of greenfield land:**
   - Building on Greenfield site will spoil the appearance/amenity of the area.

7. **Use of brownfield land:**
   - Alternative sites should be used. Brownfield sites should be used.

8. **Design of the development and impact on village character:**
   - The dry stone wall should be retained.

- The development of the site would affect the natural boundary.

9. Impact on the ecology and biodiversity:

- Impact on landscape and wildlife. Site acts as a wildlife corridor.

10. Loss of agricultural land:

- The development of the site will lead to the loss of agricultural land.

11. Flood risk/drainage:

- Site has many natural springs causing waterlogging and potential flooding issues on Hornsea Drive.

12. Impact on open / green space:

- Green spaces should be protected.

13. Impact on heritage:

- Site is close to the Wilsden Conservation Area. A heritage impact assessment is required to understand the contribution the site makes to the significance of the heritage assets and whether there is likely to be a adverse impact on the significance as a result of the development of the site. If the development would cause harm, measures to remove or reduce the harm must be included in the plan. Where the harm cannot be adequately removed or mitigated then the site should only be allocated if the public benefits clearly outweigh the harm.

14. Alternative site proposals:

- Field opposite the cricket club should be used.
- A more suitable site would be increasing the development on Prune Park Lane.
- James Spencer Mill site should be used instead.
- Haven farm should be used instead.

15. Impact on residential amenity:

- Moorside farm is three metres higher than the dwellings on Hornsea Drive affecting light and privacy.

16. Sustainability Appraisal:

- The site would not deliver major positive effect for residents (SA Objective).

17. General objection:

- Objection to the allocation of WI3/H.

Support:

Support for allocation of WI3/H.

Comments:

1. Flood risk/drainage:

- Site is in Flood Zone 1 and mitigation should be set above the 1 in 100 plus climate change level for the site as suitable for the proposed vulnerability classification. Surface water discharge rate post development should be restricted to the pre-development Greenfield discharge rate. SuDs design principles should apply.

Representation IDs: 224, 560, 2181 ,2409, 2462, 2658, 2659, 2918, 2953, 2956, 3082, 3095, 3533, 3534, 3786, 4074, 4261, 4519, ,4708 ,4815, 4887, 5186, 5534, 5756, 5885, 16862, 19733, 28722, 29493

In addition to seeking representations regarding the proposed site allocations listed above, the consultation document also provided the opportunity for respondents to provide comments on the sites as a whole, proposed new or additional sites and raise any other site related issues. The was done under the form of Question 141 within the consultation document.

Summary of Consultation

A total of 27 representations were received in relation to Question 141 from **4** respondents. Respondents included Highways England, local residents, Parish Council, developers, agent and a Ward Councillor. **Table Error***! No text of specified style in document.***6.5** (below) provides a breakdown of the representations by nature of response. The issues raised together with CBMDC's response are set out in table 96.5.

Table Error! No text of specified style in document.**6.5: Overview of Representations Received - Q141: Wilsden Preferred Site Allocations**

Question Number	Number of Representations	Number of Respondents	Object	Support	Comment
Q141	27	27	23	1	3

Table Error! No text of specified style in document..**6: Summary of Representations Received - Q141: Wilsden Preferred Site Allocations**

Wilsden Preferred Site Allocations	
Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Development of Green Belt land • Brownfield • Heritage • Landscape and character • Housing	The Council has reviewed the multiple representations made on the spatial portrait and local area strategy and they have been considered in the justification and drafting to the new Policy WI1: Wilsden, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance

• Highways • Flooding/drainage • Infrastructure • Environment • Alternative sites: • General comment • Impact on the highway network	

Summary of Representations
Objections
1. Development of Green Belt land: • Mrs Justice Lieven found that it was wrong to leave Green Belt sites in a development plan solely because the Council wished to reduce the numbers around the district proportionately. - judgement relevant to Bradford. • Prime Minister's "Build Build Build" announcement on 30/6/2020 said brownfield building would be made easier to protect Green Belt. • Green Belt should be removed and brownfield built on first • Green Belt is protected and should not be built upon • Developments will cause sprawl into secluded hamlet
2. Brownfield: • Bradford has brownfield sites that have not been delivered
3. Heritage • Crack Lane/Shay Lane field there are listed buildings next to the roads which have a risk of structural damage with building works and heavy construction vehicles passing close by. • Wilsden losing its heritage and community spirit
4. Landscape and character • Character of village will be lost.

- Rural nature of the village is being eaten away by constant developments.

5. Housing

- No room for further expansion of Wilsden
- Question the need for further development in Crack Lane, given the new housing built in the last few years.
- Wilsden is getting ruined by developers one of few nice areas left. Cheap affordable housing brings people who do not care about the area
- Objection due to density of sites - too many houses on each site
- young villagers are struggling to find affordable housing

6. Highways

- Royd St by the Co-op is one lane for 2 way traffic due to cars parked on both sides of the road.
- Potential 200+ more cars would cause serious congestion. Wilsden already congested.
- Roads are very narrow
- sites proposed at Crack Lane and Moorside Farm would potentially lead to traffic congestion and danger on the roads.
- Access on Royd Street is hazardous at the best of times, as are Crack Lane and Shay Lane.
- Crack lane is already far too busy with traffic and will become an accident waiting to happen with 40 new houses.
- Country lanes proposed for accessing development are grid locked now
- Cars travel too fast - not dealt with properly with appropriate traffic calming measures
- Villagers enjoying recreational activities have to watch for dangerous and high volume number of cars
- WI2/H - Access issues - narrow roads, no paths, non HGV safe.
- Increase in the number of vehicles accessing the village

7. Flooding/drainage

- The open areas are needed to be retain rain water run-off to protect the local and county area from future flooding.
- Flooding risk - surface water and spring already affecting current homes. Risk to current and new homes.

8. Infrastructure

- current infrastructure, roads, medical and schools cannot support any further increased demands on them.
- Poor infrastructure, Royd St and Wellington Rd already has heavy traffic , especially at peak times.
- Negative impact on local services (schools/healthcare/village hall).
- Lack of infrastructure to meet demands eroding green fields for access to sites will only have negative social and environmental impact
- Crack lane won't cope with additional traffic and the current infrastructure like drainage is not in place as the recent new builds have had this issue and are yet to be adopted by the council.
- Increase in the number of primary school places when Wilsden primary is about to reduce numbers

9. Environment

- open areas are needed to protect biodiversity.
- Building to this plan is out of touch with future environmental needs
- object to building on green belt because it has an adverse effect on the landscape, scenery and wildlife of the area.
- Green fields need to stay green fields
- 100's of additional houses in a rural village with limited and infrequent public transport links only serves to increase pollution from traffic.
- Equine safety - high horse usage in area
- Cemetery serenity will be undermined.
- Loss of good grazing land
- Loss of wildlife habitat - bats and sighting of water vole by natural spring.

10. Alternative sites:

- Objection to omission of site WI/001 - land at harden Lane. Site does not perform Green Belt functions, site is accessible. Site has no environmental constraints and could deliver 120 homes 30 affordable.
- Prospect Mill, Main Street, Wilsden would be more suitable - previously developed and capacity for more homes. Less risk to environment. Site is previously developed land and has capacity for approx. 45 homes (more than WI2/H)
- Losing green belt land when there are alternatives such as Spencer's Mill and the site of the old chicken factory
- Object to rejection of site WI/003 (Land North of Crack lane) - site available and deliverable, site appropriateness for development in Green Belt and landscape terms. Should be allocated. Rejected due to landscape impact but is without detailed assessment. Disagree with SLA comments that are anticipated to be lined to the GBOP SSA's

assessment.. Site has low impact on Green Belt. Site could deliver 15 dwellings

11. General comment

- Detailed comments by Parish Council on the proposed site allocations and the alternative sites included within the documentation. Have also detailed other potential sites which if approved would reduce the need for Green Belt deletions.
- General objection to all 3 sites due to traffic and narrow roads.

Support

1. Proposed site:

- Support allocation of site WI3/H Moorside Farm site is sustainable will deliver up to 80 dwellings.

Comments

1. Impact on the highway network:

- Not thought that individual sites on their own will negatively affect the strategic road network (SRN) the cumulative impact of sites within the plan could severely affect the SRN. The cumulative impact will need to be established by CBMDC and Highways England

2. Alternative site

- allocate this small site as residential (land at Birkshead off Birkshead Drive, Wilsden). It previously contained agricultural buildings and stands in heart of residential area. Site would make a positive contribution, minimal impact on Green Belt. Not located in a flood zone, suitable for development
- Former Chicken Factory, Station Road, Harecroft. Public Consultation did occur 2 years ago by the owners to submit an application for 30+ houses. The site is still unoccupied

3. Housing

- There is no mention in the Local Plan of The James Spencer Development which has already been approved for 16 houses and 31 apartments.

Representation IDs: 491, 803, 2469, 2917 2949, 2951, 3013, 3093, 3324, 3522, 3546, 4217, 4309, 4550, 4572, 5019, 5053, 5152, 5226, 5254, 5390, 5525, 11106, 15530, 16347, 17324, 28913

2.97 POLICY ID1: INFRASTRUCTURE DELIVERY

Overview

Policy ID1 seeks to ensure that new development within the District provides, or contributes towards the provision, of infrastructure that is needed to support it. It also includes the Council's approach to working with partners in infrastructure delivery. The policy also focusses on the provision of digital, telecommunications and utilities infrastructure.

A total of **10** representations were received from **10** respondents in relation to the contents of Policy ID1. There were received from local residents, a wildlife trust, a Government agency/body (Highways England), a utilities network manager, a neighbouring local authority and a planning consultant/agent.

Table 2.97.1: Question 141 - Policy ID1; Infrastructure Delivery - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
10	10	5	1	4

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Development on Green Belt land • Impact on local infrastructure in Ilkley • Collection, use and oversight of developer contributions • Local infrastructure plan (LIP): • Provision of mobile telecommunications infrastructure • General support • Impact on highway network • Impact on National Grid Infrastructure	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy ID2: Infrastructure Delivery in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Development on Green Belt land: • Plan places too much emphasis on the use of Green Belt sites. Sufficient brownfield sites considered to be available, and their use would more ecologically sound. • Queried why brownfield sites are not being used and whether it related to the cost of developing them. • Specific reference made to the release of Green Belt land at Crack Lane, Wilsden. • Crack Lane area considered to be congested with traffic. Further development would contribute to this. The nearby junction also busy and retaining open field allows greater visibility. Would result in over-population.
2. Impact on local infrastructure in Ilkley: • Ilkley considered not to have medical/health and school infrastructure to accept the level of population increasing resulting for the proposed developments. Both are at maximum capacity. • Quantum of development on proposed sites IL1/H and IL3/H is too large. Half of this could be sustainable given overstretched health and education facilities.
3. Collection, use and oversight of developer contributions: • Policy reflects the statutory obligations that are already required. • Should be greater engagement with communities in relation to how developer contributions are used to ensure their views are represented. • Approach to securing contributions/mitigation via the development management process was considered to be flawed as developers will be reluctant to mitigate the consequences of neighbouring or existing development, thus limiting the potential for future proofing. • Policy does not expressly identify delivery or performance related targets to ensure viability and necessity of local service/infrastructure provision.
4. Local infrastructure plan (LIP): • Does not set out milestones for delivery and reads as a separate plan to the Local Plan. Both need to be integrated to avoid conflicting priorities and completion for resources. • Delivery of the LIP heavily dependent on other organisations, therefore support its not guaranteed. Support of the LIP likely to be insufficient to guarantee successful outcomes. • Queried whether the Whole Plan Viability work will include the LIP. Must do so to ensure cohesion and affordability.

- Queried what the next steps would be if the Local Plan is deemed not viable.

5. Provision of mobile telecommunications infrastructure:

- Policy suggests that all development should consider the mobile telecommunications requirements of proposals and ensure that there would be sufficient coverage.
- Requirement considered to be disproportionate to the scale of smaller developments. Likely to be beyond the reasonable ability of developers to ensure sufficient coverage.
- Should apply to major development proposals only.

Support:

1. General support:

- Policy approach was generally supported.

Comments

1. Local Infrastructure Plan (LIP):

- Would welcome inclusion/consideration of "*Building with Nature Standards*" within the LIP to ensure the delivery good quality multi-functional green infrastructure.

2. Impact on the highway network:

- Local Plan should be underpinned by a robust transport evidence base linked to the LIP.
- LIP should clearly set out the transport infrastructure needed to enable the Local Plan to come forward, reducing the number of single-occupancy vehicle trips produced by development.
- Identified infrastructure should be costs, with appropriate funding streams and timescales for delivery.
- Council should work with Highways England in relation to sites in the vicinity of the Strategic Road Network and/or with significant trip making potentially (individually or cumulatively) to the SRN's capacity, operation and safety is not severely impacted.
- Ongoing engagement with North Yorkshire County Council in relation to their highway network welcomed to ensure that any adverse impacts are mitigated against, and any required infrastructure is included within the LIP.

3. Impact on National Grid infrastructure:

- Council should consider the impact of policies and sites on National Grid assets.
- Ongoing engagement should take place with National Grid to ensure the continued safe operation of existing sites and equipment and to facilitate future investments in infrastructure.

Representation IDs: 2069, 3761, 3778, 4540, 5728, 11568, 15531, 18402, 27764, 27859

2.98 POLICY ID2: DEVELOPER CONTRIBUTIONS

Overview

Policy ID2 highlights the general principle that contributions will be required where necessary in planning terms and indicates the broad range of matters that may need to be addressed. The impact of any contributions on the viability of a scheme will be a material consideration in the planning process as set out in Policy ID2.

A total of **3** representations were received from **3** respondents in relation to the contents of Policy ID2. These were received from a local resident, a Government agency/body (Highway England) and a planning consultant.

Table 98.2: Question 142 - Policy ID2: Developer Contributions - Summary of Representations Received

Consultation Question 142 - Policy ID2: Developer Contributions				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
3	**3**	**2**	**0**	**1**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • Approach to developer contributions • Planning obligation formulas • Local Infrastructure Plan (LIP) and Community Infrastructure Levy (CIL)	The Council has reviewed the multiple representations made on this policy and they have been considered in the justification and drafting of revised Policy ID2: Development Contributions in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Approach to Developer Contributions:

• Policy approach has been shown to fail and not an effective way of obtaining developer contributions for infrastructure. • Specific reference made to the approved Sun Lane development in Burley in Wharfedale regarding the provision of new education infrastructure. Originally started as the provision of a new school on the site but became the provision of land for it (for a period of ten years), after which it would revert to the developer.
2. Planning obligation formulas: • Appendix 13 appears to be incomplete and lacking satisfactory justification or evidence. Noted that it will be further developed. • Concern that it was premature to consult on its content, but also that items to be added/amended in future may have a material effect on deliverability or viability of development.
Support:
No representations received in support.
Comments:
1. Local Infrastructure Plan (LIP) and Community Infrastructure Levy (CIL): • Proposals need to be linked to the LIP, to ensure that identified infrastructure requirements are funded and can be delivered over the Plan period. • Approach to charging developers via the Community Infrastructure Levy Charging Schedule considered to be an appropriate mechanism.

Representation IDs: 3235, 15532, 18403

2.99 POLICY ID3: VIABILITY

Overview

Policy ID3 will help to ensure the Local Plan is viable and deliverable by establishing the principles for considering financial viability through the plan making and development management processes. The Policy supports objectives 1, 2 and 5 of the Local Plans.

In total, **1** representation from **1** respondent was submitted in relation to the contents of Policy ID3. This was received from a local resident.

Table 99.1: Question 143 - Policy ID3: Viability - Summary of Representations Received

Number of Representations	Number of Respondents	Object	Support	Comment
1	1	0	1	0

Headline Summary:	Council's Response:
Representations focused upon the following key issues: • General support	The Council has reviewed the representations made on this policy and they have been considered in the justification and drafting of the revised policies ID1 and ID2 and also taking in to account changes to national policy, whole plan viability assessments and evidence on viability.

Summary of Representations
Objections:
No representations received in objection.
Support:
1. General support: • Policy approach was generally supported.
Comments
No representations received commenting on the policy.

Representation IDs: 3766

2.100 APPENDICES

Overview

The Local Plan contains a number of appendices which are design to provide additional clarification and advice to assist in the interpretation of the document as well as the policies within it.

In total, **1** representation from **1** respondent was submitted in relation to the contents of Local Plan appendices. This was received from a landowner/developer and their agent/planning consultant.

Table 100.1: Appendices - Summary of Representations Received

Appendices				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
1	**1**	**1**	**0**	**0**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Appendix 6: Accessibility Standards	The Council has reviewed the representation made on the Appendices and they have been considered in the justification and drafting of the new Appendices in the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Appendix 6: Accessibility Standards: • Noted that the Council wish to allocate sites that meet walking distance thresholds to public transport stops and other key services. • The 800m/10-minute walk time applied to local services should also be applied to bus stops that provide a regular service to town/city centre locations.
Support:
No representations received supporting the appendices

Comments
No representations received commenting on the appendices.

Representation IDs: 30211

2.101 POLICIES MAP

Overview

The publication of the Preferred Options (Regulation 18) version of the Bradford District Local Plan for community and stakeholder was accompanied by a Policies Map. This took the form of an interactive and downloadable PDF documents.

In total, **11** representations from **7** respondents, were submitted in relation to the Policies Map. These were received from landowners, developers, agents/planning consultants and a government agency/body (Environment Agency).

Table 101.1: Policies Map - Summary of Representations Received

Policies Map				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
11	**7**	**10**	**1**	**0**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: Objections to • Land east of Sun Street, Haworth • Land at NuFarm, Wyke • Land at Lower Fagley, Bradford (SLA Ref: NE/079): • Proposed Greenway route, Ashlands Road, Ilkley • Proposed Green Belt release sites • Presentation of Policies Map • Support for Land at Sun Lane, Burley in Wharfedale (Site BU1/H	The Council has reviewed the multiple representations made on the Policies Map and they have been considered in the justification and drafting of the new Policies Map of the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Land east of Sun Street, Haworth:

- Queried why land to the east of Sun Street, Haworth was shown as being omitted for future possible housing in the draft Local Plan.
- Site was previously shown in the Strategic Housing Land Availability Assessment (SHLAA) 3 (2015) as being in the housing trajectory albeit with policy constraints.
- Queried what has change since the publication of the SHLAA and if it cannot be developed, why was it included in the SHLAA.
- Noted that another area of land (east of Ivy Bank) was also allocated in the SHLAA and given planning permission.

2. Land at NuFarm, Wyke:

- Anomalous area of land at the NuFarm Works are included within the Green Belt boundary.
- Recommended that this land should be excluded from the Green Belt and without any designation/allocation, becoming "white land", consistent with the rest of NuFarm site, with the Policies Map being updated.
- Amendment should be identified as a proposed change within Policy SP5.
- Part E of the policy, relating to compensatory improvements should not apply to the Green Belt release.

3. Land at Lower Fagley, Bradford (SLA Ref: NE/079):

- Site considered to be suitable for housing development. Was assumed that it would have been allocated, and an obvious candidate for exclusion from the Green Belt.
- Noted that it is adjacent to an ongoing Gleeson residential development.
- Considered to be of limited agricultural use as well as visually unobtrusive.
- Considered to be available with no access issues to the full site.

4. Proposed Greenway route, Ashlands Road, Ilkley:

- Route of proposed greenway was shown to run directly across an area of open land between the A65 Leeds Road and Ashlands Road in a north westerly direction from the south east corner.
- Land was noted as having planning permission for residential development.
- Whilst route was indicative, it was suggested that it should be amended to run around the site to avoid the central development area.
- Amended route would exit the A65 at the existing footpath location and run directly north towards the sewage works before turning west at a right angle to meet Ashlands Road.
- Amendment would ensure the policies map and other plans show an accurate route to ensure they are effective.

5. Proposed Green Belt release sites:

- Noted that the site allocations map and Local Area Strategy and Plans for Heaton, Ilkley and Shipley indicates that proposed site NW13/H, IL1/H and SH5/H are washed over by Green Belt.

- Considered to be a cartographic error and inconsistent with the provisions of Policy SP5, which sets out the exceptional circumstances to removed land from the Green Belt including the sites listed.
- Site Allocation Map and Local Area Strategy Plans for Heaton, Ilkley and Shipley should be amended to show the site as being removed from the Green Belt, in line with Policy SP5 and indicate that it they are solely allocated for housing.

6. Presentation:

- Recommended that the base map is changed to be in colour. The grey scale base map makes it difficult to pick out important environmental features, e.g. rivers, streams or other surface water bodies.
- Inclusion of some ecological/environmental layers were included within the interactive maps was supported. Recommended that additional layers to indicate the location of green and blue infrastructure should be added. This was considered to be an omission as the Plan contains a policy on the matters.
- Suggested that in light of the above, information such as the existing detailed river network could be mapped.
- Recommended to allow the proximity of proposed sites to be easily cross-referenced with areas of high ecological importance.

Support:

1. Land at Sun Lane, Burley in Wharfedale (Site BU1/H):

- Inclusion of site BU1/H: Sun Lane/Ilkley Road as a preferred housing allocation was welcomed.
- Noted that the site allocations map and Local Area Strategy and Plan for Burley in Wharfedale indicates that it is washed over by Green Belt.
- Considered to be a cartographic error and inconsistent with the provisions of Policy SP5, which sets out the exceptional circumstances to removed land from the Green Belt including the sites listed.
- Site Allocation Map and Local Area Strategy Plan for Burley in Wharfedale should be amended to show the site as being removed from the Green Belt, in line with Policy SP5 and indicate that it is solely allocated for housing.

Comments:

No representations received commenting on the Policies Map.

Representation IDs: 1311, 3236, 5104, 5799, 17341, 24889, 26640, 26780, 27092, 27106, 29256

Table 2.102: Impact Assessments - Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) - Summary of Representations Received

Sustainability Appraisal and Strategic Environmental Assessment				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
71	**32**	**47**	**22**	**2**

Headline Summary:	Council's Response:
Representations focused upon the following key issues: **Sustainability Appraisal Report** • Objective 5: Water Resources • Objective 6: Biodiversity & Geodiversity • Support Site WI3/H: Moorside Farm, Wellington Road, Wilsden • Addressing climate change • Consideration of water supply matters • Consideration of water supply matters • Addressing flood risk and coastal change • Addressing groundwater & contaminated land • Objective 2: Waste • Objective 4: Climate Change • Objective 5: Water Resources • Objective 6: Biodiversity & Geodiversity **Sustainability Appraisal – Appendix A – Summary of PPP Review** • National Flood and Coastal Erosion Risk Management Strategy • River Basin Management Plan	The Council has reviewed the multiple representations made on Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) please refer to Appendix A of the Sustainability Appraisal for feedback.

• Yorkshire Water Resource Management Plan • Environment Agency Catchment Flood Management Plan • Climate Change Act 2008 • EU Framework Directive on Waste • Support for: • DEFRA 25 Year Environment Plan • Environment Agency Managing Waster Abstraction • Water Framework Directive • Ambient Air Quality and Management Directive/EU Directive on Assessment & Management of Environmental Noise • Flood and Water Management Act 2010 • Biodiversity 2020 • Groundwater • Strategic Flood Risk Assessment (SFRA) • Exit from the European Union (EU) • Comments on Environment Bill **Sustainability Appraisal Report – Appendix E – SUEs** Holme Wood SUE – scoring against SA Objective 4 (Climate Change Resilience) • Consistency of scoring against SA Objective 8 (Cultural Heritage) • Scoring against SA Objective 10 (Transport) • Consistency in scoring between the overarching assessment and individual site assessments • Consideration of reasonable alternatives • Broad support • SA assessment scoring **Sustainability Appraisal Report – Appendix F – Airedale Sites** • Assessment of Baildon Sites (BA1/H; BA2/H; BA4/H; BA5/H; BA6/H) – Education Capacity • Assessment of Site BA1/H: Stubbings Lane • Development of Sites BA2H: West Lane, BA5/H: Meadowside Road and BA6/H: West Lane	

• Assessment of Site BA4/H: Green Lane • Assessment of Sites BA2/H and BA6/H: West Lane, Baildon – Scoring • Assessment of Site KY1/H: Hollins Lane, Keighley • Rejected site KY/002: Hollins Lane, Keighley • Assessment of Site BI3/H: Lady Lane, Bingley • Assessment of Site KY36/H: Long Lee Lane, Keighley – surface water flooding • Assessment of Site EM/005: Morton Lane, East Morton • Support for Assessment of site KY36/H: Long Lee Lane, Keighley **Sustainability Appraisal Report – Appendix F – North Bradford Sites** • Assessment of site NW9/H: Wilsden Road/West Avenue, Sandy Lane • Assessment of sites NW10/H and NW/024: Allerton Road, Prune Park Lane • Rejected Site SH/044: Glenview Close, Nab Wood • Site SH4/H: Glenview Drive, Bankfield Road, Nabwood • Assessment of site SH3/H: Wycliffe Road, Shipley • Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA Objective 4 (Climate Resilience): • Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA Objective 5 (Water Resources) • Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA Objective 7 (Landscape & Townscape • Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA Objective 8 (Cultural Heritage) • Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA Objective 9 (Air Quality) • Support for site Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA objectives	

Sustainability Appraisal Report – Appendix F – South Bradford Sites • Site SE/126: Hudson Road, Wyke • Site SE47/H: Westgate Hill Street, Holme Wood – assessment against SA Objective 5 (Water Resources)Assessment of Holme Wood South sites (SE46/H; SE47/H; SE48/H) **Sustainability Appraisal Report – Appendix F – Pennine Towns & Villages Sites** • Site WI2/H: Crack Lane, Wilsden - assessment against SA Objectives (3, 4, 6, 7 & 8) • Site TH/013: Spring Holes Lane, Thornton – assessment SA Objective 3 (Land and Buildings) **Sustainability Appraisal Report – Appendix F – Wharfedale Sites** • Sustainable Appraisal of proposed Ilkley sites • Assessment of site IL1/H: Ben Rhydding Drive, Ilkley • Assessment of site IL1/H: Ben Rhydding Drive • Assessment of site IL3/H: Coutances Way, Ilkley • Assessment of rejected site IL/013: Wheatley Lane • Assessment of rejected site IL/013: Wheatley Lane – Objective 3 (Land & Buildings) • Assessment of rejected site IL/013: Wheatley Lane – Objective 5 (Water Resources) • Assessment of rejected site IL/013: Wheatley Lane – Objective 6 (Biodiversity & Geodiversity) • Assessment of rejected site IL/013: Wheatley Lane – Objective 7 (Landscape & Townscape): • Assessment rejected site IL/013: Wheatley Lane – Objective 8 (Cultural Heritage) • Assessment of rejected site IL/013: Wheatley Lane – Objective 9 (Air Quality) • Assessment of rejected site IL/013: Wheatley Lane – Objective 12 (Accessible Services):	

• Assessment of rejected site IL/013: Wheatley Lane – Objective 13 (Social Cohesion) • Assessment of rejected site IL/013: Wheatley Lane – Objective 15 (Safe & Secure) • Assessment of rejected site IL/013: Wheatley Lane – Objective 18 (Employment) • Assessment of rejected site ME/005: Beech Close (North & South), Menston • Assessment of site IL1/H: Ben Rhydding Drive, Ilkley • Assessment of site IL4/H: Stockheld Road, Ilkley • Assessment of rejected site IL/016: Hadfield Farm, Ilkley • Support Assessment of • site AD1/H: Turner Lane, Addingham • Assessment of site IL2/H: Skipton Road East, Ilkley: • SA assessment was supported • Assessment of site IL3/H: Coutances Way, Ilkley • Comments on Assessment of sites AD3/H and AD4/H: Main Street/Addingham Bypass (East & West)	

Summary of Representations
Objections:
Sustainability Appraisal Report
1. Sustainability Appraisal Report: • Noted that the Interim SA Report was not intended, and was not able to fully satisfy the requirements of the Strategic Environmental Assessment Report at the current stage • Advised that section 2.1.3 of the report should a number of other sustainability issues inkling amending the assessment criteria to include greater consideration of best and most versatile agricultural land and soil resources from inappropriate development. • Considered that was scope for further consideration of opportunities that enhance ecological connectivity as part of the assessment criteria. Suggested that additional working that would capture principle of ensuring that current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced is included.

- Concluded that a significant amount of further work will be required to complete the SA for the Draft Local Plan, against which further detailed comments will be supplied when the finalised report is published.

2. SA Report – Objective 5: Water Resources:

- Objective was welcomed and supported, as were references to the ecological and chemical status of surface water under the Water Framework Directive.
- Suggested that reference should be included to groundwater and preventing pollution under this objective.
- Highlighted that Local Plans should be produced with an understanding of how local communities uses their groundwater and the location of potentially contaminated land, with the SA being an opportunity to incorporate evidence and advice into plan-making.
- The SA should reflect groundwater and contaminated land matters.
- Water resources should be better reflected within the Local Plan objectives to reflect this SA objective.

3. Sustainability Appraisal Report – Objective 6: Biodiversity & Geodiversity:

- Inclusion of a further indicator for the objective relating to the kilometres of rivers, protected and enhanced by the Water Framework Directive and net gain ambitions was encouraged.
- A further indicator should also be included relating to measurable biodiversity net gain and achieving 10% or more on developments. Would be in line with the Environment Bill.

Support:

1. Site WI3/H: Moorside Farm, Wellington Road, Wilsden:

- Proposed site allocation was supported as a sustainable extension to Wilsden.
- Noted that it consists of agricultural fields and is attached to existing development on two side, and sustainably located with good access to services.
- The findings of the SA for the site were supported, however it was noted that it scored negatively adverse effect for two objectives relating to land and buildings and biodiversity and geodiversity.
- The score was supported as it was in line the SA methodology, however it was noted that the Policy SP5 establishes exceptional circumstances for Green Belt release.

- Based on the SA methodology and site size, it was suggested that the site score against the biodiversity and geodiversity criteria should be minor adverse. In addition, it was suggested that more information was required to inform whether there were any negative impacts on designated sites more than 3km away.
- It was also noted that site score negatively in relation to a range of other SA criteria, and that this could be mitigated or avoided through the provision of more site-specific information or as part of future proposal.
- The positive scores relating the socio-economic themed SA objectives (objectives 10 to 19) was supported.
- Green Belt site assessment was also supported.

2. Sustainability Appraisal Report – addressing climate change:

- Highlighted the UK legislation requires Local Plans to include robust evidence-based carbon targets, and that there was a legal duty for them to include policies designed to secure development and land use that contributes to the mitigation, and adaptation to, climate change.
- Local carbon targets need to be set based on an assessment of local potential and taking account of national and international targets. Policies should be developed that are consistent with those targets and monitoring mechanisms created to allow for review of future performance.
- Highlighted that the Environmental Assessment of Plans and Programmes Regulations 2004 created a legal duty and required that a plan's cumulative climate impacts be assessed and taken into account. This included assessing the consistency of proposed policies with all relevant climate objectives/targets.
- Further support (in addition to the legal duties) is set out in the NPPF for local policies to support radical reductions in emissions in line with the Climate Change Act 2008.
- ADEPT guidance entitled "Preparing for a Changing Climate: Good Practice Guidance for Local Government" was noted as providing assistance for local government in preparing plans for the impacts of climate adaptation.

3. Sustainability Appraisal Report - consideration of water supply matters:

- Highlighted that Local Plan should consider the capacity and quality of water supply systems and impacts development many have on the environment including understanding the supply and demand patterns now and in future. Water availability should taking account of a changing climate.
- Suggested that water companies and LPAs should work together when producing Local Plan as the former hold information and data that help with this. Such information, it was felt should be reflected in the SA.

- LPAs were encourage to ensure emerging Plans and major developments identify and plan for the required levels of water efficiency and water supply infrastructure to support growth.
- Suggested that Water Cycle Studies and Infrastructure Delivery Plans could help understand what is needed and where seen as key parts of the evidence base.

4. Sustainability Appraisal Report – addressing flood risk and coastal change:

- Noted that the policies and site allocations in the Local Plan provided an opportunity to address flood risk and coastal change.
- The SA was considered to be an opportunity to incorporate evidence and advice in plan-making. It should include baseline information and objectives on the subject.
- Highlighted that Plans should be prepared in accordance with the NPPF and Planning Practice Guidance.
- The Local Plan process was considered to present an opportunity in relation to flood risk and coastal change.

5. Sustainability Appraisal Report – addressing groundwater & contaminated land:

- Highlighted that the Water Framework Directive (WFD) (England & Wales) Regulations 2017 and the Groundwater (WFD) (England) Direction 2016 sets out objectives for groundwater.
- Planning Authorities must have regard to those objectives and ensure that decision making helps to achieve those goals. Addressing land contamination could help to contribute to achieving WFD objectives.
- Plans should be produced with an understanding of how communities use their groundwater and the location of potentially contaminated land.
- SA considered to be an opportunity to incorporate evidence and advice into plan making. It should reflect groundwater and contaminated land matters.

6. SA Report – Objective 2: Waste:

- Objective was welcomed and supported. Waste Local Plans were viewed as an opportunity to improve the management of waste and resources

7. Sustainability Appraisal Report – Objective 4: Climate Change:

- Objective was welcomed and supported.

8. Sustainability Appraisal Report – Objective 5: Water Resources:

- Objective was welcomed and supported.

- Reference to ecological and chemical status of surface waters under the Water Framework Directive (WFD), identified as key indicator for SA Objective 5 was also welcomed.
- Reference should be included to groundwater and preventing pollution.
- Plan should be produced with an understanding of how communities use groundwater and the location of potentially contaminated land.
- SA should reflect groundwater and contaminated land matters.
- Water resources should be better reflected in the Local Plan objectives to reflect SA Objective 5.

9. Sustainability Appraisal Report – Objective 6: Biodiversity & Geodiversity:

- Objective was welcomed and supported.
- Reference to the Waste Framework Directive (WFD) as a key indicator for Objective 5 was also welcomed, however it was suggested that it should be replicated in relation Objective 6. Blue infrastructure and water quality was viewed as being fundamental to supporting biodiversity, whilst improving surface water would support ecological connectivity.
- Suggested that additional indicators should be included relating to the length of rivers protected and enhanced through the WFD, and the number of developments achieving 10% biodiversity net gain – in line with the emerging Environment Bill.

Comments:

No representations received commenting on the Sustainability Appraisal Report.

Sustainability Appraisal – Appendix A – Summary of PPP Review

Objections

1. National Flood and Coastal Erosion Risk Management Strategy:

- Recommended that reference to the National Flood and Coastal Erosion Risk Management Strategy be included within the relevant policies, plans and programmes listed in Appendix A.
- The strategy had three core ambitions concerning future risk and investment needs - climate resilient places; today's growth and infrastructure resilience in tomorrow's climate; and a nation ready to respond and adapt to flooding and coastal change.

2. River Basin Management Plan:

- Nore explicit inclusion and references to the Humber River Basin Management Plan (RBMP) was encouraged.

- The RBMP sets out details of the state of the water environment within the Humber River Basin area and indicates where local government could support other regulators in applying relevant legislation and policy to improve the water environment.
- A revised version of the RBMP was expected in early 2022.
- Recommended that the WFD's objectives should be considered in the development of environmental planning policy to ensure that the riverine environment is incorporated in nature conservation.

3. Yorkshire Water Resource Management Plan:

- Considered that Yorkshire Water's Water Resource Management Plan (WRMP) (2019) and the upcoming Drainage and Wastewater Management Plan (due to be published in 2022) should also be recognised as long-term frameworks for the management of water to support sustainable growth in the region.

4. Environment Agency Catchment Flood Management Plan:

- Recommended that the Environment Agency Catchment Flood Risk Management Plans be included within the relevant policies, plans and programmes listed in Appendix A.
- These plans provide an overview of flood risk across river catchments and recommended ways of managing risk now and over the next 50 to 100 years

5. Climate Change Act 2008:

- Climate Change Act 2008 should be included in the list of relevant legislation and frameworks.
- NPPF makes reference to local policy being required to support radical reductions in emissions in line with the Climate Change Act 2008.
- Should be linked with the Climate Change objective.

6. EU Framework Directive on Waste:

- Highlighted that Waste Framework Directive had been implemented through the Waste (England and Wales) Regulations 2011, with the Waste Management Plan for England for setting out the Government's ambition of moving to a more sustainable and efficient approach to resource use and management.
- The National Planning Policy for Waste (NPPW) needed to be read in conjunction with the NPPF and National Policy Statements for Waste Water and Hazardous Waste.

Support

1.	**DEFRA 25 Year Environment Plan:** • Inclusion of Biodiversity 2020 within the policies, plans and programmes listed in Appendix A was welcomed. • Considered that the plan should go a step further the implications of the strategy and recommended that a proactive consideration be taken of biodiversity value in terms of assessing potential site allocation. This should include aquatic environments.
2.	**Environment Agency Managing Waster Abstraction:** • Recommended that the Environment Agency's Managing Water Abstraction be included within the relevant policies, plans and programmes listed in Appendix A. • The Catchment Abstraction Management Strategy process was highlighted as assessing the availability of water resources, producing a strategy and feeding into investigations to identify failing water quality.
3.	**Water Framework Directive:** • Inclusion of the EU Water Framework Directive within the relevant policies, plans and programmes was welcomed, however it was noted that following the exit from the EU it had been transposed into UK law by the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. • The Directive established a legislative framework for the protection of surface waters and ground waters.
4.	**EU Ambient Air Quality and Management Directive/EU Directive on Assessment & Management of Environmental Noise:** • Should be consideration of air quality and the implications on sustainable objectives and site allocations, especially those in Air Quality Management Areas (AQMAs). • Highlighted that there were implications for certain industrial uses that will require a permit from the Environment Agency or the local authority. • Also, there was a need to consider the impact on wildlife, including in watercourses.
5.	**Flood and Water Management Act 2010** • Inclusion of the Flood and Water Management Act 2010 within the policies, plans and programmes listed in Appendix A was welcomed. • It addresses the threats of flooding and water scarcity, including responsibilities for the Environment Agency and Local Lead Flood Authorities.
6.	**Biodiversity 2020:**

- Inclusion of Biodiversity 2020 within the policies, plans and programmes listed in Appendix A was welcomed.
- Considered that the plan should go a step further the implications of the strategy and recommended that a proactive consideration be taken of biodiversity value in terms of assessing potential site allocation. This should include aquatic environments.

7. Groundwater:

- Reference should be included to the Environment Agency's approach to groundwater protection and the included position statements.
- Should be a consideration in terms of assessing the local plan and potential site allocations in relation to groundwater.
- Policy should not pose an unacceptable risk of pollution to controlled waters by mobilising potential contaminants in the ground.

8. Strategic Flood Risk Assessment (SFRA):

- The SFRA should be included within the SA as a key local document.

9. Exit from the European Union (EU):

- Recommended that correct references are made to all EU legislation that has been transposed into UK law.

Comments

1. Environment Bill:

- Recommended that reference should be made to the emerging Environment Bill (due for Royal Assent in autumn 2021) be included in Appendix A.
- Bill set out a requirement for mandatory Biodiversity Net Gain (BNG) – at least a 10% improvement in biodiversity value, including riparian habitats.
- Approach follows the 25 Environment Plan, whilst the NPPF contains strengthen BNG policies for planning policies and decision making to reflect.

Sustainability Appraisal Report – Appendix B – Summary of Baseline Data & Sustainability Issues

Objections

No representations received in objection to SA Report – Appendix B

Support

No representations received in support of SA Report – Appendix B
Comments
No representations received commenting on SA Report – Appendix B
Sustainability Appraisal Report – Appendix C – Consultation Responses & Subsequent Amendments
Objections
No representations received in objection to SA Report – Appendix C
Support
No representations received in support of SA Report – Appendix C
Comments
No representations received commenting on SA Report – Appendix C
Sustainability Appraisal Report – Appendix D – Policy Assessments
Objections
No representations received in objection to SA Report – Appendix D
Support
No representations received in support of SA Report – Appendix D
Comments
No representations received commenting on SA Report – Appendix D
Sustainability Appraisal Report – Appendix E – SUEs
Objections
1. Holme Wood SUE – scoring against SA Objective 4 (Climate Change Resilience) • Noted the SUE received a minor adverse effect against the climate resilience objective, but the individual Holme Wood South sites scored a minor positive effect against it.

- Minor adverse effect relating to the long-term impacts of greenfield land being replaced with built form and potential effects on the local extent of surface water flood risk was not supported.
- Holme Wood South was located in Flood Zone 1 and its climate change resilience could be improved via the inclusion of Green Infrastructure. Including SUDs and appropriate drainage strategic via comprehensive masterplanning would ensure that there would be increased surface water flood risk.
- The SUE score against the objective should be a minor positive.

2. Holme Wood SUE – consistency of scoring against SA Objective 8 (Cultural Heritage)

- SUE received a major adverse effect against the cultural heritage objective, but individual sites at Holme Wood South scored a neutral effect (site SE19/H & SE49/H) and a minor adverse effect (sites SE46/H & SE47/H) against it.
- No listed buildings highlighted as being within the Holme Wood South area.
- References to the presence of six Grade II Listed Buildings and a Grade II* Listed Building were incorrect and referred to a larger site (SE/100) - not proposed for full inclusion within the Plan.
- Scoring needs to be re-assessed and marked as a neutral effect.

3. Holme Wood SUE – scoring against SA Objective 10 (Transport):

- Scoring against the transport objective predicting a minor adverse effect was not supported.
- Considered to unduly negative, given Holme Wood South's proximity to existing bus stops along Westgate Hill Street, existing and proposed connections into the adjacent estate, and the proposed bus route (indicated on a masterplan).
- Score should be amended to a minor positive at least.

4. Holme Wood SUE - consistency in scoring between the overarching assessment and individual site assessments.

- SA Chapter noted as focussing on the assessment of SUE options, including the proposed Holme Wood SUE which consisted of seven individual housing sites.
- Overarching assessment for the Holme Wood SUE considered to contradict the assessments of the smaller individual sites that form it.

5. Holme Wood SUE – consideration of reasonable alternatives:

- Noted that draft sites and reasonable alternatives for SUEs have been reviewed, with the assessment set out in Appendix E of the SA Report.

- Highlighted that Raikes Hall Farm (site SE/163) had been omitted as part of the SUE reasonable alternatives, with no rationale. This means that the assessment of reasonable alternatives were not in accordance with NPPF requirements and a point of legal procedure to ensure that such alternatives were assessed.
- Assessment for site incorporating the SA objectives to allow a comparison to be made was provided. This showed that the sites could not be split in terms of scoring against the SA objectives.
- SE/163 considered to be a sustainable option with added benefits over SS/005 of having significant regeneration credentials to Holme Wood. Holme Wood SUE should be reallocated and extended to include more growth and assessed on that basis.

Support

1. **Holme Wood SUE - broad support**:
   - Analysis of the collective SUE as well as the individual site assessments was welcomed.
   - individual site assessments against the SA criteria were similar to one another (with a few exceptions)
   - Scored positively against the majority of the socio-economic themed objectives and the location of the site in relation to transport links and accessibility to services and employment areas.
   - Site was highlighted as being in Zone 1 Flood Risk.

Comments

1. **Holme Wood SUE – SA assessment scoring:**
   - Major positive scores awarded to the SUE against the housing, accessible services, social cohesion, education, employment and economy objectives (Objectives 11 to 13 and 17 to 19) were welcomed.
   - Individual site scoring (for sites SE46/H, SE47/H and SE48/H) against the education objective was highlighted as containing an error. Was incorrect to state that the nearest secondary school was the Tong Leadership Academy, when the nearest was actually Tong High School, immediately toe the west of Holme Wood South. Recommended that the scores should be revisited.

Sustainability Appraisal Report – Appendix F – Airedale Sites

Objections

1. **Assessment of Baildon Sites (BA1/H; BA2/H; BA4/H; BA5/H; BA6/H) – Education Capacity:**
   - Concerns related to the capacity of the four primary schools in Baildon. Report noted that these were under capacity
   - Queried the extent to which that was the case as detailed had not been provided.

• Viewed as an oversight and essential information considering the major positive effect on the education SA objective the proposed sites.
2. Assessment of Site BA1/H: Stubbings Lane: • Site is noted as being in close proximity to local primary school provision. • Construction of five dwellings means that the major positive effect on the education SA objective would be insignificant, when compared to destruction of a 100% greenfield site, close to a Local Wildlife Site (LWS) that is also an Ancient Woodland (protected by TPO) and a priority habitat.
3. Development of Sites BA2H: West Lane, BA5/H: Meadowside Road and BA6/H: West Lane: • Object to the sites being considered for development. • Despite understanding the pressure to develop land for housing, considered more brownfield sites would become available once the effects of the pandemic had been fully realised. • Noted that the sites have the potential to deliver a major positive effect for residents on the education SA objective. • Would only be the case if there was ample existing provision, which there is not**.**
4. Assessment of Site BA4/H: Green Lane: • Concerns regarding the site on grounds of flooding. • Area was noted as flooding frequently. As such, the Council need to consider the wider implications of development. • Development would lead to worse flood risk, in particular if mature trees were damaged or removed.
5. Assessment of Sites BA2/H and BA6/H: West Lane, Baildon - Scoring: • Scoring against the SA objectives for both sites were noted as being identical. • Highlighted that the sites were given a positive score against over half of the seventeen SA objectives. • Minor adverse effects were noted in respect of the natural environment theme objectives due to development taking place on greenfield and Green Belt land, as well as against cultural heritage. • Major adverse effected was predicted against the biodiversity and geodiversity SA objective, which was considered to be negatively scored. • Considered that there were significant opportunities to improve ecological connectivity as well as provide new Green Infrastructure, open space and landscape feature. Existing trees were also proposed for retention.

- Such opportunities were not reflected in the negative against the SA objective. As such it should be revisited.

6. Assessment of Site KY1/H: Hollins Lane, Keighley:

- SA assessment refers to predicted effects including adverse impacts relating to cultural heritage and positive effects for most socio-economic themed objectives as well as those relating to the location of the site (proximity to transport links, services and facilities).
- Heritage considerations arising from the site's proximity to Whinburn Lodge and gardens were noted.
- These considerations could be addressed as part a design of a deliverable scheme.
- Highlighted that the published Heritage Impact Assessment refers to mitigation measures/opportunities to enhancing the assets significance via landscaping and boundary treatments as well as retention of dry stone walls.

7. Rejected site KY/002: Hollins Lane, Keighley:

- Site was scored positively against most of the SA objectives, in particular those covering most socio-economic themed objectives and site location.
- However, it only received a "minor positive" score against its contribution to meet the District's housing need. Suggested that the score should a "major positive" against that objective.
- Site was noted as receiving "minor negative" scores against five SA objectives and "major negative" scores against 2. These scores were disagreed with.
- Land and buildings – a major adverse effect was predicted against this objective due to loss of greenfield land. Noted that a large number of the preferred sites were greenfield.
- Water resources – development would result in a minor increase in water consumption. Applies to all development.
- Biodiversity and geodiversity – development could reduce biodiversity value and ecological connectivity. Considered that site provides a significant opportunity to enhance biodiversity value, with the provision of open space and additional landscaping, in particular given the "no development" zone to account for heritage impacts. Has the potential for a "minor positive" or "neutral" score.
- Landscape and townscape – SA states that development would be likely to adversely alter the local townscape and landscape character and concluded that a "minor adverse" effect could not be ruled out. Development was highlighted as providing an opportunity to incorporate additional planning and landscaping buffers, resulting in a positive impact. Score was negatively weighted.
- Cultural heritage – site scored as having a major adverse impact against the objective. Council's evidence concluded that two thirds would have an acceptable, less than substantial harm, with the remaining third resulting in substantial harm. Considered that

appropriate design and including of the “no development zone” would be capable of resulting in a “neutral” effect. SA did not account for such a scenario.

- Air quality – appears that all development received a “minor adverse impact” against the objective due increases in air pollution in relation to existing pollution levels associated with homes and transport movements. Highlighted that the site was not in an Air Quality Management Area (AQMA) or the Clean Air Zone (CAZ).
- Accessible services – site scored a “minor negative” due to its proximity to access a range of local shops and services. However, it was considered to be accessible by public transport to numerous services.

8. Assessment of Site BI3/H: Lady Lane, Bingley:

- Objection to SA assessments relating to biodiversity and geodiversity (Objective 6), cultural heritage (Objective 8, accessible services (Objective 12) and education (Objective 17).
- Objective 6 (Biodiversity/Geodiversity) – assessment (Major negative) viewed as presumptuous and overly pessimistic. Site is planted with conifer trees and its ecological value was considered to be low, although it could be enhanced or maintained by future compensatory planting with native trees/shrubs that support biodiversity. Land could also be made available for off-site ecological enhancements.
- Harm to protected trees/woodland would be negligible. Site should be assessed as “minor negative”, although there may be potential for a “neutral” or “positive” impact.
- Objective 8 (Cultural Heritage) – site assess a “minor negative” against the objective due to potential for “minor adverse alteration” to the setting of designated heritage asset.
- Considered to be a strong degree of physical and visual separation between the Listed Building and the site due to the presence of a conifer belt.
- Listed Building will continue to benefit for its setting. Will be a neutral or negligible impact and should be assessed as such.
- Objective 12 (Accessible Services) – site assessed as “minor negative” against the objective. Assessment did not include a definition of “accessible services” or “key services, amenities and/or facilities”, which must be within 600m of the site to achieve a positive assessment.
- Highlighted that are a school (Lady Lane Park School) and a hotel within a public bar/restaurant (Oakwood Hall Hotel) around 300m from the site. Such amenities justify a “minor positive” assessment.

- Objective 17 (Education) – site was erroneously assessed as a "minor negative**".** It is located with 300m of Lady Lane Park School (providing infant/junior education) and just over 1km from Bingley Grammar School (secondary education). Beckfoot School was not the nearest. Both schools considered to have capacity. Site should be reassessed as ++ (major positive)

9. Assessment of Site KY36/H: Long Lee Lane, Keighley – surface water flooding:

- Noted that a gap had been left on the site between two land drains to create a drinking pond for cattle, which could be made good by reconnecting pipes.
- Surface water flood as a result on run-off has never been an issue for the site.
- Was anticipated any surface water flood risk could be addressed by a competent engineer and architect as part of any future development.
- Suggested measures could include avoiding construction of buildings in those sections of the site at the highest theoretical risk of flooding and raising floor and/or land levels.

10. Assessment of Site EM/005: Morton Lane, East Morton:

- Highlighted that a larger site area including the residential curtilage and buildings to the south have been included in the assessment. This issue needed to be rectified, and re-assessment of the site undertaken.
- Land and buildings (SA criterion 4) – site noted has having a better rating than the preferred allocation site EM/007 against the objective.
- Climate change resilience (SA criterion 4) – not clear why the site was rated "green pink –" when the preferred site was "green +". Both sites were highlighted as being in Flood Zone 1 and there was only a small area of difference (potentially within the southern section, which should not have been included).
- Biodiversity and geodiversity (SA criterion 6) – considered that account needed to be taken of the proposals for outline biodiversity, recreation and other environmental improvements that were proposed for the site and could be wholly accommodated within it. The same would not apply to the preferred allocation site EM/007.
- Landscape and townscape (SA criterion 7) – highlighted that landscape improvements were discussed previously and included as part of submissions supporting the site. Considered that there was full potential to improve the current landscape as well as accommodating the proposed level of development (subject to future detailed planning and negotiation)
- Transport (SA criterion 10) – site scored between that the preferred allocation site.
- Accessible services (SA criterion 12) – site was marginally preferrable to the preferred allocation against the objective.

- Education (SA criterion 17) – site scored better on access to schools than the preferred site allocation.
- Based on its performance against the above SA objectives, the was considered to be preferable to the selected allocation site EM/007.

Support

1. Assessment of site KY36/H: Long Lee Lane, Keighley:

- Assessment of the site against the SA objectives was noted as being positive and, therefore welcomed.
- Identification of the site as preferred site allocations was strongly welcomed.

Comments

No comments received in relation to the Sustainability Appraisal of the Airedale sites

Sustainability Appraisal Report – Appendix F – North Bradford Sites

Objections

1. Assessment of site NW9/H: Wilsden Road/West Avenue, Sandy Lane:

- Site was noted as scoring positively against 9 of the SA objectives, particularly most socio-economic objectives and the location of the site in respect of education, employment and health.
- Major adverse score against SA Objective 6 (Biodiversity & Geodiversity) referring to a reduction in biodiversity value and local ecological connectivity was disagreed with.
- Suggested that design considerations such as appropriate green space, additional landscaping and habitat creation would improve and enhance biodiversity value and retain ecological connectivity.
- Scoring should be amended to a neutral effect.

2. Assessment of sites NW10/H and NW/024: Allerton Road, Prune Park Lane:

- Both sites were noted as being individually assessed in the SA against the 17 objectives and that the scores were almost identical except for 3 objectives.
- Water resources (SA objective 5) – NW/024 (the larger site) scored a major adverse effect, whereas NW10/H received a minor positive. The latter score was disagreed with, with the only difference relate to the presence of waterbodies within NW/024.

- Considered that it should be result in an adverse score as the pond was not a constraint and provided an opportunity to retain and include as part of the green infrastructure strategy. Could be incorporated into SUDs and swale features. Score should be amended to a minor positive to align with that for site NW10/H.
- Biodiversity and geodiversity (SA objective 6) – NW10/H was noted as receiving a major adverse score, whilst NW/024 received a minor adverse score. Both were disagreed with as they provided an opportunity to enhance biodiversity value with the provision of open space, green infrastructure and additional landscaping. Score should be amended to a neutral score for both sites.
- Housing (SA objective 11) – due its size and scale of potential development NW/024 was noted as receiving a major positive score, compare with NW10/H that received a minor positive score.
- A large proportion of the scores for both sites were positive, particularly in relation to socio-economic objectives and the location of the sites.

3. Rejected Site SH/044: Glenview Close, Nab Wood:

- Concern that the site had not been assessed through the SA process.
- As such, the Council has not fully assessed all potential alternatives.

4. Site SH4/H: Glenview Drive, Bankfield Road, Nabwood –

- Object to the inclusion of site SH4/H within the draft Local Plan.
- Previous version of the SA (published alongside the Core Strategy Partial Review) noted as referred to Bradford District's physical activity rates being below the national average and contributing to problems with ill health.
- Due to is location (mid-way down a slope), the dwellings directly above it would have their view significantly impacted upon as would those living directly adjacent.
- Would be aesthetically damaging and may impact on mental wellbeing as a relatively area becomes significant busier and noisier.
- Previous version of the SA also referred to landscape as being an important feature of the area. Development would result in the "Wood" being taken out of "Nab Wood".
- The document also referred to the need to protect, conserve and enhance biodiversity. Proposed plans for the Green Belt would not be aligned to such a commitment.

5. Assessment of site SH3/H: Wycliffe Road, Shipley:

- Object to the inclusion of site SH3/H within the draft Local Plan.

• The SA was considered to be vague, unbalanced, incomplete and had not been substantiated with any reference to the Council's extensive documentation on the importance and protection of open space.
6. Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA Objective 4 (Climate Resilience): • Site assessed as having a minor positive impact against the objective. • Should be assessed as having a major positive impact. • Will be low surface water run-off, and the inclusion of green infrastructure within the development, potentially including a SUDS basin.
7. Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA Objective 5 (Water Resources): • Site assessed as having a minor negative impact the objective as it could pose risk to nearby water bodies and result in a minor increase in water consumption. • Latter was considered to be unavoidable and agreed, however the former could be managed. • Presence of nearby watercourses provided opportunities to create SUDS basins and the sustainable disposal of surface water, without placing additional demands on public sewers.
8. Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA Objective 6 (Biodiversity & Geodiversity): • Site assessed as having major negative impact against the objective. • Assessment considered presumptuous and overly pessimistic, with no reason. • Protected trees/woodland would be protected and retained, whilst the development would be working with a ecologist with aim of achieving net gains for biodiversity and green infrastructure. • Site noted as being with 7km of the South Pennine Moors SPA/SAC, therefore a Habitat Regulations Assessment would need to be undertaken. • Site should be assessed as neutral on the whole.
9. Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA Objective 7 (Landscape & Townscape): • Site assessed as having minor negative impact against the objective. • Development would result in the loss of open land, but not in the loss of any protected trees or woodland. • Agreed that its relationship with existing built form, limits the magnitude of potential effects on the landscape.

- No long views identified where there would significant negative effects. Developer/consultants would be working with Landscape Architects to ensure good design and appropriate mitigation.

10. Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA Objective 8 (Cultural Heritage):

- Site assessed as having a minor negative impact against the objective due its proximity to a Grade II and a Grade II* Listed Buildings and a likely impact on their settings.
- Was agreed that there was potential for an adverse impact on these settings of the Listed Buildings but viewed that this would not be inevitable.
- Could be avoided by good design and mitigation (planting and a green buffer).
- Site should be assessed as neutral, subject to mitigation.

11. Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA Objective 9 (Air Quality):

- Site assessed as having a major negative impact against the objective.
- Accepted that new development would result in some additional vehicle movements and emissions.
- Suggested that impacts could and would be mitigated by electric vehicle charging points and measures such as a Travel Plan.
- Site should be assessed as a minor negative impact.

Support

1. Site SH4/H: Glenview Drive, Bankfield Road, Nabwood – assessment against SA objectives:

- Recognition of the site's sustainable location, in proximity to educational and other facilities was welcomed.
- Minor positive impacts predicted for climate change resilience, housing, social cohesion, culture and leisure, health, employment and economy were also welcomed.

Comments

No representations received commenting on the North Bradford sites

Sustainability Appraisal Report – Appendix F – South Bradford Sites

Objections

1. Site SE/126: Hudson Road, Wyke:

- Site noted as being assessed against the 17 SA objectives and that the assessment referred to it as an “Alternative”.
- The meaning of the term “Alternative” was questioned.
- Highlighted that the Plan fell short of meeting the identified housing requirements, due to lack of inclusion of the 35% uplift.
- Suggested that a significant amount of additional sites needed to be identified. Site SE/126 was viewed as being a suitable “alternative” site that should be identified and included as an allocation.
- SE/126 was highlighted as scoring positively against the majority of the SA objectives, in particular those covering socio-economic themes and the site’s location in relation to transport links, education facilities and employment areas.
- Considered that the scores reflected it accessibility and proximity to a bus priority corridor.

2. Site SE47/H: Westgate Hill Street, Holme Wood – assessment against SA Objective 5 (Water Resources):

- The major adverse effect assessment against the objective was disagreed with.
- Site was noted as scoring negatively due to the presence of a waterbody – a watercourse that traverses the site.
- Should not result in an adverse rating.
- Watercourse has been incorporated into a masterplan, as part of the green infrastructure strategy, that provides a habitat rich environment.
- Should be seen as a positive effect or neutral.

3. Assessment of Holme Wood South sites (SE46/H; SE47/H; SE48/H):

- Major positive scores award against the Housing, Accessible Services, Social Cohesion, Education, Employment and Economy SA objectives for the SUE were agreed.
- Considered that there was an error in the scoring against the SA education objective for these sites.
- Assessment incorrectly state that the nearest secondary school is Tong Leadership Academy, when the nearest was Tong High School, located immediately to the west of Holme Wood South.
- Scores should be revisited.

Support

No representations received in support of the SA assessment for the Bradford South East and Bradford South West sites.

Comments

No representations received in support of the SA assessment for the Bradford South East and Bradford South West sites.

Sustainability Appraisal Report – Appendix F – Pennine Towns & Villages Sites

Objections

1. **Site WI2/H: Crack Lane, Wilsden - assessment against SA Objectives (3, 4, 6, 7 & 8):**
   - Considered that the SA assessment and scoring should be corrected in respect of several SA objectives - numbers 3, 4, 6, 7 and 8.
   - Land and Buildings (SA Objective 3) - the site's lower Agricultural land Classification (ALC) grade should be accounted for alongside the loss of a greenfield site, giving it a minor negative score as opposed to major.
   - Climate Change and Resilience (SA Objective 4) - site was attributed a major negative impact due to a small area of the site containing high and low extents of surface water flooding. Did not take into account confirmation that SUDs drainage would be achievable, resulting in betterment, and the increase in tree cover. Site should achieve a minor positive score, taken that into account.
   - Biodiversity and Geodiversity (SA Objective 6) - a major negative score was attributed to the site due to uncertainty surrounding its ecological value. Confirmed that the site was of low ecological value and that proposals being put forward would retain and increase its green infrastructure.
   - Need for further consideration of the likely significant effects on the South Pennine Moors SPA/SAC via the Habitat Regulation Assessment (HRA) was noted. The HRA was highlighted as being an early draft which noted that potential for effects could not be ruled out, there was low risk and mitigation was expected to be achievable. Allocation would be expected have a minor positive impact on the SA criteria.
   - Landscape and Townscape (SA Objective 7) - site was given a minor negative score against the objective. Submitted information confirmed that there would only be a minor/negligible level of change due to surrounding landscape/vegetation. Information also demonstrated how on-site landscaping could positively integrated the site with its surroundings. Site would have a neutral/minor positive effect.
   - Cultural Heritage (SA Objective 8) - a minor negative effect on two Grade II Listed Buildings was noted. Impacts were considered highly unlikely as the site was screened by development and landscape. It would also be viewed at a distance in the context of the existing settlement. Site would have a neutral effect.

2. **Site TH/013: Spring Holes Lane, Thornton – assessment SA Objective 3 (Land and Buildings):**

- Noted that the SA concluded that development would be unlikely to result in a significant effect, positive or negative, on any SA objectives.
- Assessment against SA Objective 3 (Land and Buildings) was disagreed with as the loss of a relatively small area of greenfield land did not justify a major adverse impact rating.
- Highlighted that an off-site environment improvement contributions would be provided in the form of landscaping and other positive environmental changes towards the Thornton Recreation Ground as a small improved parkland.
- Would make a contribution to the deficit of parks and gardens in Thornton and would require local consultation and discussion with the Council.

Support

No representations received in support of the SA assessment for the Pennine Towns and Villages sites.

Comments

No representations received in support of the SA assessment for the Pennine Towns and Villages sites.

Sustainability Appraisal Report – Appendix F – Wharfedale Sites

Objections

1. Sustainable Appraisal of proposed Ilkley sites:

- Concern that positive impacts (transport, education, accessibility) were deemed to be minor, whereas negative impacts were all significant and that all sites were scored "major negative" for biodiversity and geodiversity.
- Was appreciated that the Council was aiming to avoid the use of Green Belt but considered that sites should be reconsidered if, by their own assessment, there was little to achieved beyond delivering housing numbers.
- Concerning that there were potential impacts to be worsening in relation to climate resilience, cultural heritage and land and buildings for minor gain.

2. Assessment of site IL1/H: Ben Rhydding Drive, Ilkley:

- A major adverse effect on land and buildings (SA Objective 3) was noted due to loss of greenfield land, meaning the site should be deemed unsuitable, whilst a second major adverse impact was highlighted in relation to biodiversity and geodiversity (SA Objective 6).
- Generally, the site did not have any major positive effects against the SA objectives.

- Assessment against SA Objective 8 (Cultural Heritage) ignore the historic significance of the site.
- Highlighted that the majority of resources were located beyond walking distance from the site but was deemed to have a minor positive effect.
- Schools were acknowledged as a minor negative, presumably due to distance, yet apart from employment they generate more journeys than all other venues.
- Disagree with assessment that residents would have excellent access to employment in the centre of Ilkley. Suggested that most residents would commute to Leeds and that employment opportunities in Ilkley were limited.

3. Assessment of site IL1/H: Ben Rhydding Drive:

- The need for housing for recognised and there was no argument with two smaller proposed sites.
- Large developments (sites IL1/H and IL3/H) were considered to be incompatible with retaining the open, village-like nature of the town (and retaining the Green Belt).
- SA did not recognise that around 10% of the site was covered by protected trees, despite being highlighted in the site proforma. These would be destroyed as part of any development.
- Surprised that the impact on the Green Belt was considered to be moderate. The rationale behind that outcome was queried.
- Conclusion was considered at best to be meaningless and at worse a prejudiced contradiction in terms.

4. Assessment of site IL3/H: Coutances Way, Ilkley:

- Development would be incompatible with retaining the Green Belt on the eastern side of Ilkley
- Site was assessed as having a major impact on the Green Belt and that it made a major contribution to the Green Belt purposes as well as a major impact on openness.
- It was also noted as being a flood zone, which was not addressed with no sign of local knowledge.
- Summary within the proforma prejudicially concluded that the site was sutainabley located without anything being done to demonstrate that this was the case.
- Was unable to comment on the SA. However, if it concludes that developing the site would be sustainable, the rationale behind that decision/outcome was questioned.

5. Assessment of rejected site IL/013: Wheatley Lane:

• Noted that the site scores positively against a number of SA objectives in particular most socio-economic theme objectives and the location of the in relation to transport, educational facilities and employment areas as well as being in Flood Zone 1. • Site scored a minor positive against contributing to meeting housing needs. Should be considered as a major positive. A neutral score was awarded in relation to the safe and secure objective. • Concern that the site received minor negative scores against 5 of the objectives and major negative scores against 2. The negative and neutral scores against a number of objectives were disagreed with.
6. Assessment of rejected site IL/013: Wheatley Lane – Objective 3 (Land & Buildings): • A major adverse effect was predicted due to loss of greenfield land. Noted that a large number of the Preferred Sites were greenfield,
7. Assessment of rejected site IL/013: Wheatley Lane – Objective 5 (Water Resources): • Development would result in a minor increase in water consumption. Would apply to all development.
8. Assessment of rejected site IL/013: Wheatley Lane – Objective 6 (Biodiversity & Geodiversity): • Development could reduce biodiversity value and ecological connectivity. Site considered to provide an opportunity to enhance this through the provision of open space and landscaping. Score should be amended to a neutral score.
9. Assessment of rejected site IL/013: Wheatley Lane – Objective 7 (Landscape & Townscape): • SA notes that development would be likely to adversely alter the local townscape and landscape character, although built for could help limit the magnitude of potential effects. Development would provide opportunities to incorporate additional planting and landscaping buffers resulting in a positive impact. Score considered to be negatively weighted.
10. Assessment of rejected site IL/013: Wheatley Lane – Objective 8 (Cultural Heritage): • Site scored a minor adverse effect against the objective. Assessment referred to Grade II Listed Buildings associated with Wheatley Grange and considered that development would be likely to adversely alter the setting of those assets. Suggested that mitigation via development layout could be achieved and site allocated.
11. Assessment of rejected site IL/013: Wheatley Lane – Objective 9 (Air Quality): • Appears that all potential development received a minor adverse impact against the objective due to the increase in air pollution in relation to existing levels. Site was noted as not being in an AQMA or the CAZ.
12. Assessment of rejected site IL/013: Wheatley Lane – Objective 12 (Accessible Services):

- Site scored a neutral effect against the objective, despite being within 400m of a convenience store and petrol station, a local comparison shop and within 800m of shops on Wheatley Lane as well as a garden centre. Considered that daily needs of residents could be met within close proximity to the site. Should score positively against the objective.

13. Assessment of rejected site IL/013: Wheatley Lane – Objective 13 (Social Cohesion):

- Site received a neutral score due to proximity to the A65 and the noise, light and air pollution associated with it. Did not allow for appropriate design measures, siting, orientation or landscaping that could mitigate it. Site has been negatively scored and should score a minor positive.

14. Assessment of rejected site IL/013: Wheatley Lane – Objective 15 (Safe & Secure):

- Neutral score seemed overly negative, particularly due to the explanation that development could potentially enhance community cohesion and wellbeing, or increase natural surveillance, helping to combat the risk of crime.
- No reason why site should not score a minor positive. Development could incorporate various measures to enhance safety and security.

15. Assessment of rejected site IL/013: Wheatley Lane – Objective 18 (Employment):

- Neutral score seemed overly negative. Site highlighted as being with 5km of the Ilkley town centre, which would be a minor positive rating as it is an employment area.
- Reason for neutral score related to the loss of agricultural land impacting on employment opportunities in agriculture. Not considered a valid reason for the negative scoring, given the sites site.

16. Assessment of rejected site ME/005: Beech Close (North & South), Menston:

- SA Assessment against objective 7 (Landscape & Townscape) was not supported and that an alternative conclusion should have been reached.
- Suggested that development would not result in the loss of any landscape feature that hold an individual landscape or visual value or are of specific importance to the wider landscape character.
- Existing landscape features worthy of retention such as trees within/bounding the site, and stone walling could be incorporated as part of a new development. Together with new planting, retained vegetation would contribute to the well-wooded character of the locality and help integrate new development into the landscapes.

17. Assessment of site IL1/H: Ben Rhydding Drive, Ilkley:

- Were a number of inaccuracies and points that needed to be addressed in the Sustainability Appraisal.

- Objective 7 (Landscape & Townscape) - negative impact of housing on the high visual amenity of this area for the community and visitors had been underestimated. Should be seen as a major negative.
- Objective 8 (Cultural Heritage) - Ben Rhydding Drive was noted as having Listed Buildings/heritage assets.
- Objective 9 (Air Quality) - assessment referred to new employment premises, however it was 130 dwellings that were proposed with associated air pollution with the SSSI Risk Zone.
- Objective 10 (Transport) - Ben Rhydding Drive highlighted as private access road, meaning a new access via Wheatley Grove/Wheatley Lane junction, which was narrow with poor sight lines would be needed, increasing hazards. Would also be an increase in traffic on Wheatley Grove towards the junction with High Wheatley (narrow with poor sight lines) and onto a blind corner at the junction of High Wheatley/Ben Rhydding Road. Increased traffic would endanger pedestrians and cyclists and be contrary to national and local active travel policies. Access via Wheatley Grove would also increase the distance for the railway station, whilst there are no frequent buses. Would be a major negative with a decline baseline.
- Objective 11 (Housing) - building at a density of 18 dwellings per hectare would not meet the Plan's density requirements (or one of any increased density) would not represent a significant contribution to the housing numbers and tenure mix to warrant the negative impact of destroying the functionality of the site within a SSSI Impact Risk Zone. Was a major negative.
- Objective 13 (Social Cohesion) - local infrastructure and services were overstretched and could not support more. Was a major negative.
- Objective 16 (Health) - site considered to be of substantial and regular use to residents. Development would have a major negative impact on the wellbeing of residents and PROW users due to destruction of natural habitats. Wharfedale Hospital (Otley) was noted as being 10km west of the site, not 6.4km.
- Objective 19 - the history and scale of the proposed development suggested that construction would likely be by a larger developer not smaller local builders. Level of disruption and extra construction traffic could also be a negative for local businesses suggesting a positive/negative effect.

18. Assessment of site IL4/H: Stockheld Road, Ilkley:

- Sustainability assessment for the site was agreed in the main.
- Given the increase in the number and severity of severe flooding incidents and risk of water pollution, scores against SA Objectives 4 (Climate Change Resilience) and 5 (Water Resources) should be revised to become major negative effects.

- Due to limited car parking caution was expressed about even sensitive development of the site to prevent further adverse effects against SA Objective 13 (Social Cohesion). Need to check the land ownership position and site size due to car parking appearing to be within the site boundary.

19. Assessment of rejected site IL/016: Hadfield Farm, Ilkley:

- Major error in the summary assessment for the site relating to flood risk. Submitted masterplan was highlighted as ensuring development would be in Flood Zone 1, whilst a more detail flood risk assessment would be carried out and put forward SUDS mitigation measures as part of its drainage proposals. Council's assessment considered to be speculative. Rating for SA objective 4 should be change to minor or neutral impact due the large areas of open land being retain (and other arguments).
- References to presence of a TPO woodland were incorrect - the only woodland area was located outside the site boundary.
- Considered that soil quality would not be depleted as the land was classed as ALC Grade 3 and used sheep grazing.
- Suggested that water bodies could be accommodated within the site via good drainage/environmental practice. Assessment had not examined proposals in the submitted masterplan or recognised the wider protection/environmental corridor within them. Rating should be minor negative or neutral or positive.
- Biodiversity - SA objective 6 - the submitted proposals and environmental enhancements put forward in them were not considered. Major mosaic of enhanced habitats was proposed (but not yet designed). Highlighted that work had taken place over seven years together with previous evidence, provided a stronger case for allocating the site instead of land to east of Ilkley.
- Cultural Heritage - SA Objective 8 - considered that the setting and proximity of parts of the Ilkley and Middleton Conservation Areas could be fully taken into account at the detailed design stage. Government policy on creating beauty of place and building groups would set high standards to support this. Negative scoring based on supposition.
- SA Objective 11 - 175 to 200 dwellings would represent a substantial contribution to housing need in Ilkley and the District as a whole. This was more than a minor positive contribution.
- Health - SA Objective 16 - development would include major recreation, natural and landscape content that would bring substantial benefit towards disease prevention and human wellbeing. Counterbalances the distance to health facilities. Overall assessment should be neutral.
- Employment - SA Objective 18 - would be no proven loss of agricultural employment as transitional grazing provides part of employment for one or two people.

Support

1. Assessment of site AD1/H: Turner Lane, Addingham:

- Summary of the SA assessment highlights that development of the site would be unlikely to result in a significant effect (either positive or negative) on any SA objectives. This was not disagreed with.
- Noted that whilst the site scored adverse effects against SA objectives 12 and 17 relating to accessibility to services and education. The distances of 1.4km to both were considered to be acceptable.
- Site was noted as being well located to the bus network and in a sustainable, easily accessible location on foot or by bicycle. Addingham, as a whole, fell within an acceptable 2km walking catchment

2. Assessment of site IL2/H: Skipton Road East, Ilkley:

SA assessment was supported.

- Noted that SA objective 6 was the only area with a major negative effect due to potential to trigger likley significant effect on the North and South Pennine Moors SPAs/SACs.
- In relation to SA objective 10, it was agreed that there was a need for segregated cycle parth between Ilkley and Addingham to allieviate pressure on the A65 and work towards a net gain improvement in air and noise quality as well as social cohesion. Would enhable development o be car free and support a mix homes.
- Recommended that the site has a neutral score, as exceptional circumstances for Green Belt release had not been demonstrated, but with some positives.

3. Assessment of site IL3/H: Coutances Way, Ilkley:

- Noted that development would have major and minor adverse effects on natural environment indicators of local, national and international significance as well as Green Belt and greenfield loss, land and buildings, Green Infrastructure of high visual amenity, landscape character, cultural heritage and air quality.
- Sustainability assessment was agreed within the main, however it was emphasised that greater consideration needed to be given achieving a net improvement to flood
- For the major positive effect identified for transport to be in keeping with climate change mitigation and provide net gains in biodiversity and flood reduction, it was suggested that development on the site must be car free and include investment in the Wharfedale Greenway.

Comments

1. Assessment of sites AD3/H and AD4/H: Main Street/Addingham Bypass (East & West):

- Suggested that due to the proposals for the retention and environmental enhancement of the large area of open land between the sites, the Council would need to significantly review its scoring system for the creation of wider mixed-use site that brings together a wide range of benefits.
- The submitted masterplan proposals would provide mitigation and enhancement that would change the negative assessment against SA Objectives 3, 6, 7 8 and 9 and increase the positive assessment against SA Objectives 10, 11, 12, 16 and 19.

Representation IDs:

- Sustainability Appraisal & Strategic Environmental Assessment – Interim Report – 17325, 19924, 29085, 29088, 29089, 29114, 29115, 29291, 29292, 29293, 29295, 29297, 29301, 29304, 29309, 29312, 29313, 29315, 29316, 29317, 29318, 29320, 29321

- Sustainability Appraisal & Strategic Environmental Assessment - Appendix E - SUE Assessments - 28165, 28169, 28170, 28171, 29962, 29963, 30193

- Sustainability Appraisal & Strategic Environmental Assessment - Appendix F – Airedale - 11482, 18417, 29514, 29544, 29550, 29857, 29858, 29869, 29870, 29888, 29889, 29916, 30147

- Sustainability Appraisal & Strategic Environmental Assessment - Appendix F - North Bradford, City Centre, Canal Road - 28239, 28307, 28514, 29503, 29590, 29862, 29863, 29864, 29865

- Sustainability Appraisal & Strategic Environmental Assessment - Appendix F - Pennine Towns & Villages - 16348, 30149, 30150

- Sustainability Appraisal & Strategic Environmental Assessment - Appendix F - South Bradford Urban Area - 18408, 28172, 28173

- Sustainability Appraisal & Strategic Environmental Assessment - Appendix F – Wharfedale - 1736, 16996, 18409, 21062, 29689, 29696, 29779, 29780, 29786, 29788, 29797, 30133, 30148

Table 2.103: Impact Assessments - Habitat Regulations Assessment - Summary of Representations Received

Habitat Regulations Assessment (HRA)				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
5	**2**	**3**	**2**	**0**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Assessment of traffic emissions on the SPA/SAC • References to site BU1/H being used by SPA birds • Lack of reference to HRA for application 16/07870/MAO	The Council has reviewed the multiple representations made on Habitat Regulations Assessment and they have been considered in the justification and drafting of the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments (including a new Habitats Regulations Assessment) and changes to national policy / guidance.

Summary of Representations
Objections:
1. Assessment of traffic emissions on the SPA/SAC: • Noted that evidence to inform the assessment of traffic emission on the SPA/SAC had not been undertaken. • Recommended that such evidence was gathered and the assessment undertaken at the earliest opportunity. May impact on soundness and legal compliance of proposed growth targets and spatial distribution.
2. References to site BU1/H being used by SPA birds: • References (in Table 3) to site BU1/H have a risk of likely significant effects on the SPA/SAC, based on presumption it is considered to have suitable supporting habitat types that could be used by SPA birds, were incorrect. • Has been established, on the basis of objective evidence that the land was/is not used by SPA birds for foraging
3. Lack of reference to HRA for application 16/07870/MAO: • Draft Local Plan HRA does not refer to the HRA adopted by the Secretary of State (SoS) in relation to planning application 16/07870/MAO.

- The latter was based on empirical evidence. Surveys found no movement of birds between the SPA and the site (or surrounding land).
- SoS's HRA of the development concluded the two basic principles that must be acknowledged in future versions of the Local Plan HRA:
  - Land can only be supporting habitat if it is regularly used by SPA birds. Presences of SPA bird species does not prove the site contains supporting land,
  - If birds such as golden plover are feeding on the site, they are not birds associated with the SPA, therefore the land is not supporting habitat for the SPA.

4. Impacts from urban edge effects:

- Impacts from urban edge effects have been overstated in the HRA.
- No evidence presented to demonstrated how these effect may be manifest on larger moorland site such as the South Pennine Moors.
- Incorrect to state (in paragraph 4.3) that all allocation sites within 400m can cause fragmentation effects. The SPA/SAC is protected not the surrounding land. No development proposed within the SPA/SAC, therefore not possible to see how fragmentation could be a potential impact pathway.
- Evidence provided (in paragraph 4.12 & 4.13) for urban edge effects was related entirely to lowland heathland sites. No evidence provided relevant to large moorland and other upland habitats presented.
- Evidence (in paragraph 4.14) regarding impacts of domestic cats in entirely unproven. No evidence to show cats affect birds at population level.

5. Impact assessment of loss of functionally linked land:

- Draft HRA impact assessment of the loss of functionally linked land is fundamentally flawed as it is not the presence of a certain type of habitat that is important, but the presence of SPA birds.
- This basic principle (tested at Sun Lane, Burley in Wharfedale) must be acknowledge in future versions of the HRA.
- Questionable, given the various surveys that have been carried out, whether the policy protecting land outside the SPA is necessary. No evidence of even sporadic movement of birds from the SPA to surrounding land.

Support:

1. Support:

- Noted the evidence informing the Habitat Regulations Assessment (HRA) was published for consultation and that following this the HRA would progress with further detailed evidence gathering and assessment to inform the Regulation 19 version of the Local Plan.
- Noted that the scope of impact pathways identified was acceptable and overall approach taken within the HRA was robust in terms of referencing up-to-date case law, definitions and guidance.

2. Assessing impacts on South Pennine Moors SPA/SAC:

• Approach to assessing the loss of functionally linked land for South Pennine Moors SPA birds, and recreational disturbance and urban edge effects on the SPA and SAC welcomed. • Natural England should be consulted on a revised version of HRA, when available.
Comments:
No representations received commenting on the document

Representation IDs: 19925, 19926, 19927, 24897, 27679

Table 2.104: Impact Assessments – Equalities Impact Assessment - Summary of Representations Received

Equalities Impact Assessment				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
1	**1**	**1**	**0**	**0**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Impacts on population of Tong Ward	The Council has reviewed the representation made on the Equalities Impact Assessment and it has been considered in the justification and drafting of the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments (including a new Equalities Impact Assessment) and changes to national policy / guidance.

Summary of Representations
Objections:
1. Impacts on population of Tong Ward: • Disproportionate releases of land for development at Holme Wood South, together with SEBAR would have severe and permanently detrimental effects on the local population. • Does not seem to have been taken into account in the Equalities Impact Assessment. • Proposed releases and their equalities impact should be objectively reassessed before Regulation 19.
Support:
No representations received in support.
Comments:
No representations received commenting on the document

Representation IDs: 13811

2.106 EVIDENCE BASE DOCUMENTS

Overview

The publication of the Preferred Options (Regulation 18) version of the Bradford District Local Plan for community and stakeholder was accompanied by a range of supporting evidence base documents, some of which are required by legislation.

In total, **64** representations were submitted in relation to the contents of the supporting documents. These were received from Government agencies/bodies (Environment Agency, Natural England), landowners, developers, agents/planning consultants, local residents, a playing fields organisation, a local environmental group, an elected member and a Town/Parish Council. **Table 106.1** (below) sets an overview of the number and nature of representations received in relation to the supporting documentations. The issues raised together with the Council's responses are set out in subsequent tables, where representations were received.

Table 106.1: Evidence Base Documents - Overview of Representations Received

Evidence Base Document Name	Number of Representations	Object	Support	Comment
Flood Risk Technical Note	2	1	1	0
Heritage Impact Assessment	2	0	2	0
Open Space Audit Report	2	1	1	0
Open Space Needs and Demand Assessment	2	1	1	0
Site Assessment and Rejected Sites Background Paper	52	48	3	1
Strategic Land Assessment (SLA)	4	4	0	0

Table.106.2: Evidence Base - Flood Risk Technical Note - Summary of Representations Received

Flood Risk Technical Note				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
2	**1**	**1**	**1**	**0**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Application of sequential and exception test • Strategic Flood Risk Assessment/evidence base update	The Council has reviewed the representations made on the Flood Risk Technical Note and they have been considered in the justification and drafting of the Regulation 19 Publication Draft. This has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations

Objections:

1. Application of sequential and exceptions test:

- Council should demonstrate via evidence how it has considered a range of options in the site allocation process using the SFRA to apply the Sequential Test and the Exception Test, where necessary.
- Could be undertaken directly or ideally via the Sustainability Appraisal (SA). Decisions to allocate land within high flood risk areas, where other sustainability considerations outweigh flood risk, should be clearly documented with reasoned justification for them in the SA report.
- Sequential Test could also be demonstrated in a free-standing document or as part of the strategic land assessment.
- Recommended that a free-standing Sequential Test document is produced to show how requirement of the NPPF and PPG have been fulfilled.
- Would enable ease of reference throughout each stage of the Plan's development.

Support:
1. Strategic Flood Risk Assessment/evidence base update: • Noted that there was no agreed SFRA update, and the Council has committed to producing such evidence. • Where data was lacking, the Council would produce evidence to a sufficient standard. Uncertainty includes key considerations including but not limited to the removal of 3a(i) designations; agreeing a 3b designation; and climate change that may/will affect some sites, this may affect allocation viability / requirement. • Noted that the Council was committed to amending the draft plan and allocations based on the updated SFRA as required, before subsequent Local Plan stages. • Appendix D stated that Policy EN7 would be updated following the SFRA update in order to make use of the best information to inform the policy, which may change as a result. • Difficult to provide comments on the policy with the required SFRA data. However, comments on Policies EN7 and SP9 may or will change upon the review of the updated SFRA.
Comments:
No representations received commenting on the Flood Risk Technical Note

Representation IDs:

29084, 29253

Table 106.3: Evidence Base - Heritage Impact Assessment - Summary of Representations Received

Heritage Impact Assessment				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
2	**2**	**0**	**2**	**0**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Proposed site allocations	The Council has reviewed the multiple representations made on the Heritage Impact Assessment and they have been considered in the justification and drafting of the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
No representations received in objection this assessment.
Support:
1. Proposed site allocations BA2/H and BA6/H • Noted that the heritage impact assessments put forward a number of mitigation measure including creation of a landscape buffer to the northern edge, retention of tree clusters and use of sympathetic materials, all of which were supported.
Comments:
No representations received commenting this assessment.

Representation IDs:

18418, 29917

Table 106.4: Evidence Base - Open Space Audit - Summary of Representations Received

Open Space Audit				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
2	**2**	**1**	**1**	**0**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Availability of/access to report • General support • Proposed standards Amenity Green Space and Natural/Semi-Natural Greenspace • Proposed standards – Parks, Pitch and Sport Provision • Accessibility standards	The Council has reviewed the multiple representations made on the Open Space Audit and they have been considered in the justification and drafting of the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Availability of/access to report: • Report could not be accessed.
Support:
1. General support: • Fields in Trust (FiT) would welcome opportunity to work with the Council in ensuring the protection of open spaces. • Noted that FiT is reference in the audit in relation to standards and that Council has considered up to date standards.

• Opportunity exists to investigate strategic mapping/modelling work in relation to typologies.
2. Proposed standards – Amenity Green Space and Natural/Semi-Natural Greenspace • Proposed standards for amenity green space and natural/semi-natural greenspace both fall below Fields in Trust (FIT) standards. This bolsters the case for protection of amenity green space. • Suggested that the Council should be more ambitious with standards for natural/semi-natural green space, a typology whose provision was viewed as crucial in combatting climate change.
3. Proposed standards – Parks, Pitch and Sport Provision: • Current provision and standards exceeds FiT standards. • Play areas identified as main facility that is lacking. Scope for play protection where new play areas are provided to safeguard this provision.
4. Accessibility standards: • Accessibility standards are similar to FiT standards, although those for amenity green space and natural/semi-natural green space goes beyond them.
Comments:
No representations received commenting this assessment.

Representation IDs:

1749, 23782

Table 106.5: Evidence Base - Open Space Needs and Demands Assessment - Summary of Representations Received

Open Space Needs and Demands Assessment				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
2	**2**	**1**	**1**	**0**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Availability of/access to report • General support •	The Council has reviewed the multiple representations made on the Open Space Needs and Demands Assessment and they have been considered in the justification and drafting of the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Availability of/access to report: • Report could not be accessed.
Support:
1. General support: • Noted that Fields in Trust (FiT) and its guidance was reference in the assessment.

• Recognition given to the fact that the assessment used a community survey to judge needs and demand. Survey considered to be more comprehensive than most and illustrates Council's commitment to open space provision. • Highlighted that the Council has a good portfolio of amenity green space that was valued in terms of number of visits. Queried whether would be a consideration to protecting them with FiT. Noted that the survey showed people where prepared/expected to travel 10 to 15 minutes to amenity green space, so protection would ensure local spaces on doorsteps were preserved. • Noted that survey respondents were mostly satisfied with provision. Queried whether this could be safeguarded with FiT to ensure the provision remains. FiT were interested to understand the amount to time people were prepared to travel to different typologies. • Several key sites were identified in the survey and would encourage the Council discuss protecting all of them. • Noted that other sites were cited as for each area as being important. Would welcome the opportunity to apply research to help shape a protection strategy.
Comments:
No representations received commenting this assessment.

Representation IDs:

1750, 23781

Table 106.6: Evidence Base - Site Assessment and Rejected Sites Background Paper - Summary of Representations Received

Site Assessment and Rejected Sites Background Paper				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
52	**37**	**48**	**3**	**1**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Rejected sites IL/044, IL/012, ME/013, BU/015, BU/005, BU/014, SI006A, HA/006, BU2/H, D/005, SH/044, IL/020A, EM/005, TH/013, KY/151, KY/105, IL/015, AD/013, HR/001, EM/004, OX/001, NE/128, ME/007, HA/013, AD/008, AD/005, NW/031A, SE/098, KY/039, OA/001, NE/072, NE/053, SW/034B, SE/077, AD1/H, ME/005, CO/011, SE/070, BI/050, IL/20B,CU/008, SE/062, NE/062 • Availability of detailed site proformas and analysis • Use of Green Belt land • Support for sites AD/011B, SI/003, SI/006 • Comment on rejected sites in Addingham	The Council has reviewed the multiple representations made on the Site Assessment and Rejected Sites Background Paper and they have been considered in the justification and drafting of the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Sites IL/044 and IL/012: Skipton Road

- Objection to the proposed rejection of site IL/044.
- Allocation of site IL/044 and adjacent site IL/012 to provide a mix of housing in a sustainable would be supported.
- Not that IL/044 was not as assessed as part of a Green Belt parcel. Therefore, an assessment of IL/044 and IL/012 against Green Belt purposes would be required.
- Considered that the distribution of new homes to Ilkley was not sufficient to support its growth and focus as a Principal Town. Distribution of housing to Ilkley should be increased and additional sites identified.
- Release of three sites from Green Belt viewed as insufficient to ensure the protection of the Green Belt boundary beyond the plan period. Suggested that additional safeguarded land should be identified protect the boundary.
- Site has no known constraints to its physical delivery. Both are located within Flood Zone 1 and access could be obtained from Skipton Road.
- Would result in encroachment into the countryside, however Council has recognised there are exceptional
- circumstances through the release of three sites around the town to meet housing need.

2. Site ME/013: Otley Road, Menston:

- Advocate the allocation of the site within the Local Plan for residential development.
- Considered to be suitable, available, deliverable and achievable, as well as performing favourable compared to the Preferred Options, such as ME1/H which has no direct access and issues with delivery as well as outside the Core Strategy Accessibility Standards.
- Can be safely accessed from Otley Road and complies with Core Strategy accessibility standards.
- Site not covered in the Sustainability Appraisal/Strategic Environmental Assessment.
- Disagreed with the Green Belt assessment – suggested that the site should be rescored downwards from “Major” to “Moderate”.
- Considered that the housing target for Menston should be higher.

3. Site BU/015: Land off Burley Bypass, Burley in Wharfedale:

- Objection to assessment conclusions rejecting the site.
- Noted that policies do not support any increase in employment provision in Wharfedale. Site was considered to be ideally situated to provide employment, located on the A65 corridor.
- Suitable to accommodate new, high quality employment development.
- Reasons for rejection capable of being mitigated through design.

4. Site BU/005: Land north of Banner Grange, Burley in Wharfedale:

- Object to the rejection of site BU/005 as a preferred housing allocation.

	• Site should be allocated as a preferred allocation to support the delivery of housing in Burley in Wharfedale (a Local Growth Centre) • Site is available and deliverable for development in the short term as well as having no known physical constraints to prevent development.
5.	**Site BU/014: Bradford Road, Burley in Wharfedale**: • Object to the rejection of site BU/014 as a preferred housing allocation. • Site should be allocated as a preferred allocation to support the delivery of housing in Burley in Wharfedale (a Local Growth Centre) • Site was considered to be available and deliverable for development in the short term as well as having no known physical constraints to prevent development.
6.	**Site SI/006A: Land at the Willows, Hainsworth Road, Silsden**: • Noted that site was granted planning permission for 44 dwellings despite being rejected for the proposed Local Plan. • Concerns expressed over conflicting views within the Council regarding what is an appropriate site. Did not give confidence to the planning process or the Local Plan contents.
7.	**Site TH/022: North Cliffe Lane, Thornton**: • Site was considered to represent an opportunity for an allocation within a Local Growth Centre (Thornton) in accordance Polices SP1-3, SP5 & SP8. It was noted as being well-related to the built up with well-defined physical boundaries. • It does not perform any of the purposes of including land with Green Belt and makes no contribution to openness. As such considered should be given to removing it from the Green Belt in accordance with Policy SP5. • It would not lead to the extension of development beyond existing boundaries due to its contained nature or lead to towns merging and is closely related visually and physically to the urban area as it is separated from the wider urban edge by mature trees. • Would no significant impact on any heritage asset, although development could taking into account the need protect the setting of the listed building to the north (Hoyle Ing House) by retaining buffer, and assist in urban regeneration. • A new Green Belt boundary would follow existing field boundaries and substantial tree belts, which are considered to be easily recognisable, defensible and clear boundaries on the ground. Will lead to a more robust long-term defensible boundary. • Considered to be in highly sustainable location with access to public transport and a wide range of facilities within walking distance. • It is visually and physically to adjoining development and makes no material contribution to the area's character • Would represent an opportunity to provide a greater choice of housing and make a significant contribution to meeting the shortfall in housing land.

- It was noted there were not technical reasons preventing the site making a contribution. These include not being locating within an area liable to flooding, having utilities infrastructure available adjacent to the site, and North Cliffe Lane being able to accommodate additional traffic generated as well as no highway safety issues. The use of SUDs would also be explored.
- No trees are presented within the main body of the site, however important boundary trees worthy of retention could be accommodated within any development and form part of the new Green Belt boundary.
- Site was considered to be available, suitable and deliverable, and satisfy the release criteria for housing sites.
- Draft plan was viewed as being unsound. Requested that site TH/022 be included as a preferred allocation for development.

8. Site HA/006: Land at Mytholmes Lane, Haworth:

- Objection to the rejection of site HA/006. Suggested that not all the land should be rejected as a preferred site.
- Considered that part (the bottom section) of the site could be retained as Green Belt to reinforce the landscape setting of the River Worth. Would form roughly an equal area of land on both sides of the river to separate Haworth and Oakworth.
- Existing Green Belt boundary considered to be drawn too tight to existing houses with no space for future expansion.
- Site has two access points (Mytholmes Lane) and Hebble Row) and is within 400m of a bus stop.

9. Site BU2/H: Scalebor House, Moor Lane, Burley in Wharfedale:

- Process of assessing and comparing reasonable alternative sites and screening criteria for initially rejecting sites which are not reasonable/realistic options was noted.
- Considered that the site has fundamental issues associated with its delivery. Should have been initially screened out as not being a reasonable or realistic site in line with the site selection methodology.
- Noted that one of the screening criteria was “Green Belt sites which are not adjacent and contiguous to the built up area and or could not reasonably form an acceptable urban extension”.

10. Availability of detailed proformas and analysis:

- Noted that more detailed proformas and analysis behind the conclusions reached for rejected sites were not made available for comment.
- The right to view and comment on this information when available was reserved. Considered to be pertinent to the site selection strategy to meet local housing apportionments.

11. Site AD/005: Main Street, Addingham:

- Considered that site AD/005 should be including within the Local Plan. Was noted as being in the control of a developer and felt to be suitable and deliverable with potential for approximately 50 to homes.
- Addingham was considered to be tightly bounded by the Green Belt or designated Local Green Spaces, resulting in limited opportunities for new housing to be developed.

	• Stated that the Council would need to allocation more homes, with Addingham receiving a proportion of these with the site being a suitable location for them. • Should the Council consider that more homes were not needed, it was suggested that one of sites AD3/H or AD4/H should be deleted and an alternative (AD/005) identified for 40 dwellings. • Suggested that when the site assessment methodology is published, it would be shown that site AD/005 is more suitable and preferable and should replace sites for approximately 80 homes.
12.	**Sites SH/044: Glenview Close and SH/048: New Close Road, Shipley:** • Objection to failure to accolated sites SH/044 and SH/048. Was requested that both sites should be reconsidered as one combined for the purposes of the emerging Local Plan. • Would represent a logical rounding off of the settlement, given its location between a school and residential development. • It would not lead to encroachment into the countryside, urban sprawl or coalescence of settlements, thus no longer serving a Green Belt purpose, meaning that it should no longer be protected. • Would be more logical than site SH4/H, which does not relate as well to the settlement and would lead to encroachment. Topography was also considered to be prohibitive with significant access issues. • Combined site was considered to be constrained and matters such as ecological impacts could be mitigated via future design proposals. • SH/044 should have not been rejected on access grounds. A previous enquiry to the Council had resulted proposals being generally acceptable with no major highway issues arising. • A proposed layout showed that access could be achieved, if the site were to be brough forward in isolation. Site was incorrectly dismissed.
13.	**Use of Green Belt criterion**: • Objection to the manner in which Green Belt Review criterion were introduced into the site selection process at various stages as well as on certain other more limited issues. • Will cumulatively lead to a need review parts of the proposed seven stage site selection methodology.
14.	**Site IL/020A: Ben Rhydding Drive, Ilkley**: • Suggested that exclusion, and subsequent allocation, of the site from the Green Belt was justified in relation to the exceptional circumstances that apply to housing need, requirement and supply in Ilkley. • Would also be justified in terms of the need for a range of sites, including small deletions from the Green Belt where it could logically achieved in associated with adjacent nearby changes, as was the case in the area surrounding the site.
15.	**Site EM/005: Morton Hall, Morton Lane, East Morton**:

- Requested that the site EM/005 be re-considered as a preferrable, or alternative, allocation to proposed site EM/007.
- It would bring a wider range of benefits given its potential and superior sustainability performance.
- Is also capable of making a meaning contribution to market and affordable housing as well as meeting a higher component of the full objectively assessed housing need that should be attributed to East Morton.
- Would help to resolve two key settlement issues identified for the village.

16. Site TH/013: Spring Holes Lane, Thornton:

- Suggested that the land (site TH/013) should be allocated for a residential development of circa 58 dwellings.
- Would contribute towards an enhanced housing requirement for Thornton (800 to 825 dwellings).
- Considered that some greenfield and brownfield sites were subject to a variety of constraints and/or environmental requirements that would reduce their combined capacity by around 100 dwellings.
- Disagreed with conclusion of the site-specific Green Belt assessment that the site had a major potential impact. It was suggested that the site's relationship with the recreation ground (to south west) and sports fields (to west) represented opportunities for environmental improvements and appropriate landscaping.
- Disagree with the Sustainability Appraisal assessment against SA Criterion 3. The loss of a relatively small area of greenfield land did justify a major adverse impact rating.

17. Site IL/015: Slates Lane, Ilkley:

- Seeks to include part of the site within the Plan as an allocation. Proposal involves five dwellings with the remainder of the site being retained in the Green Belt, with proposed environmental enhancements.
- Suggested that it would present an opportunity for a small housebuilder or self-build project. Will help provide a variety of site opportunities (as set out in Policies HO4 and HO6) and innovation (as sought by Policy SP8).
- Area noted as being closely attached a residential outlier washed over by the Green Belt.
- Suggested that this could be resolved by removing part of Curley Hill from the Green Belt, with a revised boundary following the urbanised area and the east/west highways (Slates Lane and Carters Lane). Would provide a clear, logical and highly defensible boundary.

18. Site AD/013: Bolton Road, Addingham:

- Object to rejection of site due to landscaping constraints, despite having a clear beneficial location outside the 2.5km buffer of the SPA/SAC and in close proximity to the primary school as well as services and facilities.
- Noted that other site allocations refer to development have a sensitive site design to mitigate any impact on landscape character.
- Site considered not to be in a sensitive landscape designation, as such there was no reason to allocate other sites over and above AD/013.

	• Site located within existing pockets of housing and adjacent to a caravan park. • Requested that AD/013 is allocated in the next version of the Local Plan as it would represent sustainable development. Will continue to be promoted through remaining stages.
19.	**Site HR/001: Harden Road, Harden**: • Highlighted that the owner is keen to develop the site and confirmed its availability. Would be deliverable, if allocated. • Considered that due to the revised methodology for calculating housing requirements, Bradford will need to provide housing that shown in the Draft Plan. Site could contribute towards doing so. • Previous scheme showed access being feasible and illustrative layout showed how open space could be line to the adjacent park.
20.	**Site KY/151: Long Lee Lane, Keighley**: • Highlighted that the owner is keen to develop the site and its availability was confirmed. Would be deliverable, if allocated. • Site will help to deliver Bradford District's increased housing requirement under the revised standard methodology. Noted that it was considered as an alternative option. • Will not involve the release of Green Belt land. • Previous scheme showed access being feasible and illustrative layout showed how housing could be developed. Also shows that topography would not prevent development. • Landscape and Visual Impact Assessment has examined the landscape impact of the site.
21.	**Site EM/004: Street Lane, East Morton:** • Site confirmed as available with landowner keen to progress with development. Noted that it was considered as an alternative. • Suggested that due to revised methodology for calculating the housing requirement, Bradford would need to provide more housing than shown in the draft Plan, with the site contributing towards this. • Site described as not suitable due to access and impact on conservation area. • Highlighted that a design had been submitted to show access was achievable and would not prevent delivery. Any development would be designed with the setting of the Conservation Area as a primary consideration.
22.	**Site KY/105: Harewood Hills Farm, Goose Cote Lane, Keighley**: • Considered to be highly sustainable, suitable and immediately available • Will meet some of the District's housing requirement over the plan period. • Will help to address the planned distribution of housing and help to demonstrate a robust housing supply to meet targets. • Will provide a range of housing types/sizes to meet identified long term needs in the local area.

23. Site OX/001: Denholme Road, Oxenhope:

- Objection to the rejection of site OX/001 and its allocation as Local Green Space**.**
- Highlighted as having been allocated for residential development in the past but has since reallocated as Village Green Space. Development was to have been guided by a Design Brief.
- Village Green Space designation considered not to represent the site due to no public access and lack of contribution to the setting of the area. Was felt to be a slightly sloping, grubby field between houses.
- Site should not be designated as a Local Green Space as it does not meet the criteria of it (as set out in the Oxenhope NDP). Such a designation should only be used where a site is demonstrably special and holds local significance.
- Suggested that the Cross Lane site had more beauty and significance as a Local Green Space site due to presence of special features.
- Suggested that the Crossfield Lane site should not be identified for development as it would undermine the Green Belt designation and set a precedent for Green Belt erosion.
- Site considered to present an opportunity for a sensitive design to mitigate impacts on the Conservation Area. A flood risk assessment and ecology survey would be undertaken and mitigation put in place. Noted as being on a bus route with stop adjacent to the site, whilst safe access could be provided from Denholme Road.
- Some positive effects predicted for a range of the SA Objectives.

24. Site NE/128, Kenstone Crescent, Idle:

- Site considered to be available and suitable for development, with no constraints that could not be addressed or mitigated for.
- Not considered that having “limited access” was a reason that could be sustained as a reason to justify its non-allocation. Developer has control over part of an adjacent garden, which would allow for a suitable access to be achieved.
- Idle noted as being a settlement with a range of services and facilities, all of which were in close proximity to the site.

25. Site ME/007: Burley Road, Menston:

- Menston was considered to be a sustainable location for housing growth with a good level of facilities and excellent accessibility by public transport.
- There is limited potential for housing delivery as there a few previously developed sites that could be used as windfall and settlement is constrained by Green Belt. As such, new housing allocations are required.

26. Site HA/013: Marsh Lane, Haworth:

- Haworth was considered to be a sustainable location for housing growth with a good level of facilities and excellent accessibility by public transport.

	• There is limited potential for housing delivery as there a few previously developed sites that could be used as windfall and settlement is constrained by Green Belt. As such, new housing allocations are required.
27.	**Site AD/008: Main Street, Addingham**: • Site suggested as an alternative option. • Highlighted as being a former garage, which could be development with having a major impact on the purposes of the Green Belt. • Site is adjacent to the settlement boundary, close to the services and facilities in the village centre, as well as a bus stop. • Considered that the site should be safeguarded for mixed use development. Would secure additional employment in the village as well as housing – possibly in the form of live/work accommodation, and/or with small workshops and shared work/meeting space.
28.	**Site AD/005: Main Street, Addingham:** • Noted that the site was rejected despite being closer the village centre and local amenities, and as such considered to be better site even though located in the Green Belt. • It would help to reduce traffic entering and passing through the village. The entrance to the site was considered to be safe and easy. • Would allow residents to walk into the village and support local businesses in line with Policy SP7. There would be less impact on the Green Belt. • Could provide most the housing numbers for the village. • Should be revisited as a suitable alternative to sites AD6/H or AD7/H.
29.	**Site NW/031A: Hazel Walk, Daisy Hill, Bradford**: • Not aware of any good reason why the site should not enjoy residential opportunity, given its location – it is virtually surrounded by residential development. • Is scheduled to be developed as a single opportunity with adjacent land, already identified in the draft plan for residential use.
30.	**Site SE/098: Wyke Mills, Huddersfield Road, Wyke:** • Site should be considered as future potential residential or mixed residential/commercial opportunity as part of the emerging Local Plan. • Existing buildings, all of which are tenanted are elderly and let on the basis of short term occupancy. • Considered to be a non-conforming land use, being surrounding by either residential or woodland. Nearby land has also been developed for residential use.
31.	**Site KY/039: Banks Lane, Riddlesden**: • Objection to failure to allocate site.

	• Considered suitable for residential development due to its road frontage and south-facing orientation • Abuts residential development on three sides. • Concern over its non-allocation was noted. Site should be reconsidered with a view to allocation in the next issue of the Local Plan.
32.	**Site OA/001: Providence Lane, Oakworth**: • Site considered to provide an opportunity create a strong, defensible Green Belt boundary. In isolation, it constitutes an irregular protrusion into the Green Belt. • Reasons for rejection were not substantiated and appear to be contrived. • It has no surface water flooding issues, whilst SuDS would remedy any problems. • Could deliver a major positive effect on the health SA objective, whilst minor positive effects were predicted for nearly all other socio-economic SA objectives. • An HRA would be undertaking to ensure that there would be no significant effects on protected sites. • Development would cause only very minimal landscape impact. • Heritage was cited as a reason for rejection, but no HIA has been carried out. • Site considered to be sustainable location, adjacent to the settlement boundary within a reasonable proximity to services and facilities.
33.	**Site NE/072: Lower Fagley Lane, Fagley, Bradford**: • Assumed that site would have been allocated. • Considered to be an obvious candidate for exclusion from the Green Belt. • Viewed as being visually unobtrusive and suitable for housing, as opposed to limited agricultural use. • Land is available for housing and has no access issues.
34.	**Site NE/053: Station Road, Esholt**: • Objection to decision not allocated residential element of the Esholt site/application. • Has been established that land detached from the boundary of Bradford North East (Sites NE22/H and NE23/E). No procedural reason why it the Council could not allocated the housing site. • NPPF provides clear guidance on approach to be taken when releasing Green Belt but does not state that land has to be adjacent to existing settlement boundaries. Presumed that this was intentional so as not to preclude suitable sites which are not adjacent to a settlement boundary. • Site NE/053 was viewed as a case in point. Noted that it adjoined a settlement, but not one that is within the settlement hierarchy.

- Site was highlighted as being previously developed and well served by public transport (close to Apperley Bridge station). Would be sequentially preferable to most Green Belt release sites being proposed.
- Council was considered to be aware of exceptional level of design and sustainability being proposed as part of the development. Would help to further justify the site's release from the Green Belt as a proposed housing allocation.
- Allocation would that there would a small reduction in the amount of greenfield, Green Belt release, should the housing target remain as proposed.

35. Site SW/034B: Land south of Fenwick Drive, Woodside:

- Objection to failure to allocate site SW/034B.
- Deletion of the Green Belt was considered to be justified, with the site being deliverable and developable, and would assist in meeting housing need (including affordable housing) in Bradford South West.
- Development would not affection the character or openness of the Green Belt. Implementation of a landscape framework (for SW14/H and SW/034B) could frame and screen views into and out off the site, enhancing its key characteristics.
- Development of SW14/H and SW/034B would enable a clear and defined edge of the built up are to be established.
- Development would not affect the defined elements of South Bradford. It would not give rise to significant impacts on the South Pennine Moors SPA and SAC.
- Elements of the South Bradford Landscape Character Area could be enhanced and strengthened via appropriate boundary treatments, including new native trees and hedgerows. Links to green infrastructure and open space could also be enhanced.
- Site would comply with the settlement hierarchy and support the regeneration of Woodside. Considered to be well-contained by existing development and within a sustainable location (accessible by high frequency bus network and in close proximity to Low Moor railway station) compared with other preferred sites.
- Principle of development was considered to be acceptable due to identification/allocation of site SW14/H. Smaller scale developments in the area would not present the same opportunity for transformational changes at Woodside (provided by SW/034B).
- Development would provide residents with improved access to jobs, services, transport and health and education facilities when compared to other preferred sites.
- Highlighted that the setting and grounds of Royds Hall is predominately to the south of the Hall, where development of SW/034B (and SW14/H) cannot be seen. Setting was already impacted upon by the allocation/development of SW14/H (276 dwellings). Would be no significant harmful impact on the farm steading as these could be suitably mitigated by an appropriately landscaped development layout.
- Site was considered to perform better in terms of the Sustainability Appraisal scoring (in particular on biodiversity and geodiversity, and accessible services) than other Green Belt sites.

36. Site SE/077: Summer Hall Ing, Delf Lane, Bradford:

- Allocation of site SE/077 and additional land to the north and west was sought.
- Would be contiguous to the built up area and would form an acceptable urban extension. This could contribute to the provision of affordable housing, resolution of anti-social behaviour and the regeneration of the Delf Hill estate.
- Noted the SE/077 has a history of being a preferred site for housing development and was tested on appeal in relation to the proximity of a hazardous installation.
- Considered that being in a consultation zone for hazardous installation would preclude housing development or allocation of the land for development.
- Previous reasons for supporting the grant of planning permissions and previous allocation had not changed significantly.
- Development would support and enable regeneration of the Delf Hill estate and the wider area.
- Development would assist in the cessation of ongoing nuisance caused by anti-social behaviour.

37. Site AD1/H: Turner Lane, Addingham:

- Allocation of the site with a capacity for 20 dwelling was supported.
- Noted that a Highways Advocacy Document and Preliminary Ecological Appraisal had been undertaken in support of the site.
- Overall conclusion of the Green Belt Assessment was disagreed with. It needed to be re-evaluated, particularly given the adjoining part (AD/020; AD7/H) was scored differently.

38. Site ME/005: Beech Close, Menston:

- Objection to exclusion of site ME/005. Considered to be a deliverable site, which is suitable, achievable and available.
- Site was only rejected due to Green Belt and landscape impacts; however, these reasons had not been fully justified via the evidence base.
- Technical documentation was provided to demonstrate that development of the site would have minimal impact on Green Belt and the local landscape.
- Site should be allocated based on the current housing requirement proposed in the draft Local Plan as it is suitable, available and achievable
- Noted that there will a shortfall of 9,000 units across the plan period, meaning a need to apportion additional units to Menston with the site being allocated once the requirement is increased to the standard method level.
- Technical assessments relating to highways, landscape, Green Belt and ecology have been provided.

39. Site CO/011: Cottingley Cliffe Road, Cottingley:

- Objection to exclusion of site CO/011.

- Considered that CO/011 was more appropriate that site CO/002 and should replace the latter as the only allocation in Cottingley.
- Noted that CO/011 was identified as an alternative site. Should the Local Plan progresses as proposed, it was suggested that CO/011 be allocated as safeguarded land.
- Reserve land will be needed over the plan period as not all allocated sites will come forward. Have safeguarded sites would help to maintain the five year housing land supply.
- Noted that there will a shortfall of 9,000 units across the plan period, due to Council not accounting for the 35% uplift as required by the standard method. Additional sites would be required to meet this shortfall.
- Anticipated that the site will be allocated, as it was identified as an alternative.

40. Site SE/070: The Knowle, Whitehall Road, Wyke:

- Object to rejection of site due to proximity to hazardous installations.
- HSE evidence concluded that the site falls with the middle zone of the hazardous installation. Residential development would be classed as Level 2 sensitivity where HES generally do not advise against development.
- Reports concluded that there were no technical constraints that would prevent the delivery of housing on the site.
- Should be allocated for housing.

41. Site BI/050: Micklethwaite Lane, Bingley:

- Site should be added to the preferred housing site allocations for Bingley and identified in the Local Plan.
- It should be released from the Green Belt to allow for its development under Policy SP5.
- Noted that it was not allocated due to landscape impact and heritage impact.
- Site noted as being enclosed by other built development. Landscape impacts on the wider countryside would be minimal.
- Laythorpe Farm highlighted as being the nearest Listed Building and located within the Sty Lane housing development. Development would have no impact on the setting of the Listed Building, as it will be enclosed by development and adjacent to other permitted housing development.
- Site highlighted as being with the Leeds Liverpool Canal Conservation Area and close to the Micklethwaite Conservation Area.
- The latter noted as being a longer designation with different land uses adjacent to the canal. Characterised by development consisting of a variety of different buildings, ages and approaches. No reason why development could not be undertaken without unacceptably impact on the character and appearance of the Conservation Area.
- Impact on Micklethwaite Conservation Area would be minimal due distance and presence of allotment site.

42. Site IL/020B: Ben Rhydding Drive, Ilkley:

- Disagree with conclusions of the Green Belt review rejecting the site as it was not attached to the urban area.

- Site was previously included with 500m arc distance from the urban edge in the 2013 Growth Study (still part of the evidence base). Growth Study appraisal did not dismiss the site's potential for a future residential allocation.
- Further disagree with Council's conclusion that the site "could only come forward as part of a larger change to the Green Belt boundary including the release of the adjacent site IL/037 in association with IL/039 which lies to the west of IL/037".
- Suggested a further linkage was available involving the future allocation of site IL/009 in association with the current residential cell on Ben Rhydding Drive. Removing that cell from the Green Belt together with part of sites IL/020B and IL/009 would achieve a logical association and attachment with the urban area.
- Would be more logical and have less adverse impact on the five Green Belt purposes.
- Specific exceptional circumstances have been established for greater provision of housing on sites which have sustainable development credentials. Proposals were considered to form a truly sustainable development by meeting the three objectives.

43. Site CU/008: Woodfield Road/Bingley Road, Cullingworth:

- Site should be added to the preferred housing site allocations for Bingley and identified in the Local Plan.
- It should be released from the Green Belt to allow for its development under Policy SP5.
- The site was considered preferrable for allocation instead of site CU3/H for a number of reasons.
- Site enclosed by other housing developments. Given such characteristics, it would be logical to release it from the Green Belt and would representation a sensible rounding off of the Green Belt boundary compare to CU3/H, which would project into the countryside.
- Impact on rural character and appearance of the open countryside would be minimal as previous development had already altered it.
- Considered that careful consideration would need to be given to finished floor levels and parking/manoeuvring areas to address sloping topography. Suggested that there was no reason why an appropriately designed scheme could not be produced and was not a reason to discount the site.
- The topography was also felt to be an advantage. Development would be set a lower level in order to less prominent in the local landscape.
- Noted that only the south eastern tip was within an identified flood risk area. The design of any scheme would ensure that this constraint was allowed but considered that there was no reason why development would be at an unacceptable risk from flooding or could not provide surface water attenuation measures.
- Located close to the village centre and would be a sustainable location. Has good access to local shops, services and public transport. Would help to further sustain the continued provision of such facilities within the settlement.
- Access could be achieved from Bingley Road.

	• Owner considered willing to see site developed and would be supportive of the allocation. Has no known obstacles or exceptional costs that would prevent development.
44.	**Site SE/062: Holme Lane/Raikes Lane, Holmewood**: • Objection to omission of the site as a preferred option. • Considered to form a logical extension into the Green Belt and would not conflict with the Green Belt purposes defined in the NPPF. • Council is required to examine current allocations (as shown the current policies map. Considered an appropriate time to examine the Green Belt and reassess the approach to the site. • Site forms a coherent extension to the settlement and is available and deliverable for housing (in the short term) Was previously identified as part of previous proposals and as an area to be potentially removed from the Green Belt. • Will deliver necessary housing, whilst strengthening the Green Belt in the area. Should be brought forward for development.
45.	**Site NE/062: Lynmore Court, Idle**: • Site should be considered for housing. • Viewed as being sustainable, deliverable, accessible and ideal for the type of small innovative housing needed when adapting a post-Covid world. • Noted as being connected to an existing community as well as adjacent to a large area of open land. • Unlikely to appear of a volume housebuilder but would be prefect for small, forward thinking development or self-builder.
Support:	
1.	**Site AD/011B: Land behind former primary school**: • Would be in favour of including the site. • A larger site would accommodate more dwellings in an accessible and sustainable location. • Would remove the need to build on more valuable green belt sites to west of the village.
2.	**Site SI/003: Brown Bank Lane, Silsden**:
3.	**Site SI/006: Hainsworth Road, Silsden**: • Noted that this was the only other non-Green Belt site (apart from site SI/003) to be rejected due to issues including access, protected hedges, landscape impacts and flood risk. • Aware that access was severely constrained with limited prospect of upgrading it (would require third land).

- Site not considered to be a comparable/more favourable option over sites SI/003 and/or SI/004. Noted that is was not subject to SA, suggesting that it is not considered as a potential allocation.

Comments:

1. Rejected sites in Addingham:

- Council's reasons for rejecting sites in Addingham were supported with the exception of one site, which forms part of site AD/008.
- Highlighted as being a former garage, which could be development with having a major impact on the purposes of the Green Belt.
- Site is adjacent to the settlement boundary, close to the services and facilities in the village centre, as well as a bus stop.
- Previously applications have been refused. However, subject to full ecological assessment, development would be supported.

Representation IDs:

2355, 4838, 4889, 4908, 4953,5103, 6030, 7247, 7410, 7483, 7518, 16865, 17397, 17670, 18105, 18412, 24282, 24893, 24894, 27472, 27480, 29912, 30069, 30071, 30072, 30075, 30125, 30192, 30218, 30221,30222,30223,30224,30225,30249,30250,30251,30252,30253,30254,30255, 30256, 30261, 30292, 30325, 30347, 30348, 30350, 30352, 30353, 30356, 30360

Table 106.7: Evidence Base - Strategic Land Assessment - Summary of Representations Received

Strategic Land Assessment (SLA)				
Number of Representations	**Number of Respondents**	**Object**	**Support**	**Comment**
4	**4**	**4**	**0**	**0**

Headline Summary:	**Council's Response:**
Representations focused upon the following key issues: • Site WI/003: Crack Lane North, Wilsden • Rejection of Site SE/126: Hudson View, Wyke • Differences in potential yield • Rejection of Site IL/016:Hadfield Farm, Skipton Road, Ilkley	The Council has reviewed the multiple representations made on the Strategic Land Assessment (SLA) and they have been considered in the justification and drafting of the Regulation 19 Publication Draft, which has also been informed by an updated evidence base, impact assessments and changes to national policy / guidance.

Summary of Representations
Objections:
1. Site WI/003: Crack Lane North, Wilsden: • Site rejected due to potential landscape impacts. • Done without detailed assessment or consideration of the site (other than Green Belt impacts). • Does not correspond with previously submitted information. Reference made in the Site Promotion Document to land and Green Belt impacts as well as deliverability. • Disagree with SLA's unsubstantiated comments were anticipated to be lined to the Green Belt Site Specific Assessment (GB SSA). • Site considered to have low potential impact on Green Belt. GBOP SSA should be amended, and the site allocated.
2. Rejection of Site SE/126: Hudson View, Wyke:

• Noted that the SLA replaces the Strategic Housing Land Availability Assessment (SHLAA) • SLA rejected the site due to impact on ancient woodland, landscape impacts and access over railway tunnel. • SLA lists the site under the heading “Unsuitable/Not Achievable for residential development – Rejects”. • Object to rejection of the site and the reasons for this.
3. Differences in potential yield: • Significant differences within the housing yields set out in the SLA compared with the those in Draft Local Plan. • Clarification required relating to these discrepancies.
4. Rejection of Site IL/016:Hadfield Farm, Skipton Road, Ilkley: • Object to reasons for rejection of site IL/016 in the Strategic Land Assessment – sensitive landscape and limited access. • Reasons for rejecting site based on sensitive landscape appears to be derived from the Sustainability Appraisal. Queried whether a landscape/visual appraisal produced in 2016 providing initial but comprehensive assessment had been taken into account. Masterplan noted as contain substantial and positive landscape proposals. Description of landscape and other environmental enhancement potential appears not to have been considered. • No specific analysis provided to support limited access as a reason for rejection. Two proposed access in masterplan noted as being surveyed. Suggested that it would be desirable to have a comprehensive masterplan for all land to the north of the A65, with the two proposed accesses. The eastern access (at Victoria Road traffic lights) was considered to be preferable as the main access with potential to increase capacity of existing system.
Support:
No representations received in support of this assessment.
Comments:
No representations received commenting on this assessment.

Representation IDs: 16351, 18407, 28163, 30132