Wilsden Parish Neighbourhood Plan

Pre-Submission Consultation Outcomes

Neighbourhood Plan Policy No.	Respondent	Main Comments	Response
General	Coal Authority	The draft Neighbourhood Plan appears to contain no recognition of the issue of unstable land or the issue of mineral sterilisation. Whilst Neighbourhood Plans are prevented from dealing with minerals issues, mineral sterilisation and safeguarding is clearly identified in National Policy as a matter for plans which allocate new development.	Noted that you have no specific comments to make.
	Highways England	You may already be aware that we continue to work closely with Bradford Council in regards to potential future development and growth in the area of which this Neighbourhood Plan helps inform and we remain engaged closely in the local plan consultation process. Whilst we have no formal comments at this point with regard to the Wilsden Parish Neighbourhood Development Plan proportion of the wider picture, on behalf of the Secretary of State for Transport, I would like to offer my thanks again for sending this through and keeping in touch.	Noted that you have no specific comments to make.
	North Yorkshire County Council	The Parish of Wilsden does not adjoin the boundary of North Yorkshire. Having reviewed the consultation documentation, as an officer response, it does not appear that there are any significant cross boundary issues that are likely to be of interest to the County Council and therefore at this stage we have no specific comments to make.	Noted that you have no specific comments to make.
	Natural England	Where a neighbourhood plan could potentially affect a European protected site, it will be necessary to screen the plan in relation to the Conservation of Habitats and Species Regulations (2010). One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive. A neighbourhood plan cannot be made if the likelihood of significant effects on any European Site, either alone (or in combination with	Noted, and can confirm that a SEA screening assessment for the Plan is planned.

Gladman	other plans and projects) cannot be ruled out. Therefore, measures may need to be incorporated into the neighbourhood plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the possible effects of the plan on European protected sites. This will be particularly important if a neighbourhood plan is to progress before a local plan has been adopted and/or the neighbourhood plan proposes development which has not be assessed and/or included in the Habitats Regulations Assessment for the local plan. To conform with the requirements of the Framework, the Council has submitted its Core Strategy DPD to the Secretary of State for examination on 12th December 2014. Subject to modifications the Inspector's Report confirms that the Plan meets the tests of soundness outlined in paragraph 182 of the Framework. The adoption of the Plan has been delayed following the Secretary of State's Holding Direction. The Government has now issued its response to the Council lifting the Holding Direction which will allow the formal adoption of the Core Strategy. The letter did highlight that "The Secretary of State acknowledges that the Plan does not alter the existing boundaries of the Green Belt and that any future changes to Green Belt boundaries will be through the preparation of Site Allocations." Accordingly, it is important that the WNP allows for flexibility and does not prevent the ability of land being released from the Green Belt where it no longer provides the functions required by national policy. Failure to ensure this flexibility could lead to conflict with the emerging Site Allocations DPD should any land be released, as \$38(5) of the Planning and Compulsory Purchase Act states: 'If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan for an area conflicts with another policy in the development plan the conflict must be reso	Noted. We can assure you that the Plan will "not prevent the ability of land being released from the Green Belt".
David Wilson Homes	document to be adopted, approved or published (as the case may be).' At present DWH support large extents of the WNP, in particular: - • The acknowledgement that existing allocations, sites with planning permission, previously developed sites and sites located within the	This general support for large extents of the

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		current defined development limits of the Village, would not deliver the anticipated number of homes required by the Bradford Core Strategy. • The proactive decision to identify the release of housing sites from the Green Belt in order to deliver the number of homes required by the Bradford Core Strategy. • That an objective of the WNP is to protect important local leisure and community facilities, retail and employment provision, and wherever possible, enhance them.	Plan is noted and welcomed.
W/HO1: A Presumption in Favour of Sustainable Development	Avant Homes	Advise that the policy wording is amended as follows: 27823/A3/CA 3 26th July 2017 "When considering development proposals, the Plan will take a positive approach that reflects the presumption in favour of sustainable development as set out in paragraph 14 of the National Planning Policy Framework" - Then the policy would be supported.	Partially agreed. The Policy will be removed. However, the supporting text will be retained as it provides a useful context for the Plan. Your suggestion will be reflected in the supporting text.
	Gladman	Suggest that the wording of the policy is modified slightly to ensure that the policy will support the implementation of objectives of the Framework - "When considering development proposals, the Plan will take a positive approach towards sustainable development."	Partially agreed. The Policy will be removed. However, the supporting text will be retained as it provides a useful context for the Plan. Your suggestion will be reflected in the supporting text.

W/HO2: Wilsden Sustainable Development	Avant Homes	The policy would not meet the tests of soundness outlined in paragraph 182 of the National Planning Policy Framework (NPPF), namely it is not justified, effective or positively planned. There is no planning policy basis at a local or national level which justifies the restriction on the size of a site-specific development. This policy unnecessarily restricts the scale of development proposals coming forward to meet identified housing needs.	Disagree. It is considered that the NPPF supports it. The proposed limit on the size of a site specific development was a high priority of the community as evidenced by community consultation.
	Gladman	It is important that suitable flexibility/support is provided within the Policy to ensure that the Plan will be supportive of any future decision of BCC to release land from the Green Belt in a future Local Plan review or Site Allocations DPD. As per our comments in respect of policy W/HO2, the size of new development should not be restricted. There are a number of factors to consider, such as site density which have a bearing upon the level of development that can suitably come forward on a site. []The ability to achieve suitable densities could be severely affected in certain instances if the size of development is restricted. There is no evidence to suggest why it is considered appropriate to limit development within the NPA to no more than 4 houses on greenfield sites. In restricting development to this maximum level the WNP is not conforming to the positive approach of the Framework or the direction taken through the emerging Core Strategy and as such Gladman suggests this element of the policy is deleted. There are a number of other factors which are controlled through the planning system which ensure that the level of development which comes forward is suitable and appropriate for the location, such as highways considerations, landscape impacts etc and as such the reference to small scale development in part a) should be removed.	Disagree. It is considered that the NPPF supports it. The proposed limit on the size of a site specific development was a high priority of the community as evidenced by community consultation.
	David Wilson Homes	The policy would not enable the full benefits of housing development to be delivered. The restriction on a size of development, also restricts its viability potential and the benefits it can deliver. Benefits	Disagree. It is considered that the NPPF

		which include the ability to meet affordable housing policy requirements and the delivery of a more varied mix of homes, particularly two and three-bedroom properties. Finally, the restriction imposed by the policy would mean that more than one housing site would need to be released in order to meet the outstanding housing needs of the Village. Accordingly, this would result in two areas of the Village being impacted by the construction of new homes. It is our view that one site should be released to meet the outstanding needs of the Village and that this site should be DWH's Site Ref. WI/001.	supports it. The proposed limit on the size of a site specific development was a high priority of the community as evidenced by community consultation.
W/HO3: Wilsden Settlement Boundary	No comments received		
W/HO4: Development Proposals Outside Wilsden Settlement Boundary	Avant Homes	It is assumed that land outside the settlement boundary will be Green Belt rather than open countryside and will be protected by Green Belt policies at a local and national level and as such we would question the need for this policy.	It is agreed to remove the policy, but to retain the supporting text as this provides useful context.
	Gladman	Land outside the defined Wilsden Settlement Boundary will be treated as countryside. As stated above the settlement is contained by the existing Green Belt boundary. It is not clear why this policy in deemed necessary. Gladman therefore recommend that the above policy is deleted.	It is agreed to remove the policy, but to retain the supporting text as this provides useful context.
W/HO5: Housing Provision	Avant Homes	The neighbourhood plan itself cannot allocate sites for residential development, [] the Parish Council are recommending that 3 sites are allocated by Bradford Council in their Allocations Plan. Moorside - The site is considered to be suitable, available and achievable and would therefore meet the requirements of paragraph 47 (footnote 11 and 12) of the NPPF and would represent a logical extension to the village that would "round-off" the settlement. Suitable vehicular access could be achieved from Wellington Road and the site is located in flood zone 1 and therefore represents a low flood risk. The site is likely to be of low ecological value having been	It can be confirmed that the Plan is not seeking to allocate sites for development. It considers that that is more effectively undertaken by

		hogyily worked by horono [] Not considered to be any physical	Bradford MDC
		heavily worked by horses. [] Not considered to be any physical constraints that would prevent this site coming forward for residential	through their
		development.	Allocations Plan.
		development.	The Steering
			Group has
			considered the
			existing
			'commitments',
			and considered
			them suitable for
			housing development.
	Judy Caunt	St Matthews Close -5-8; Manor House Road – 12; Moorside Farm –	Your comments
	Judy Caulit	10. Agree that these sites will provide approx. 30 dwellings. Also	are noted. The
		with existing approval is Wellington Road behind Medical Centre –	Plan supports
		11. This would provide approx 41 dwellings.	your view that
		W/HO9 Laneside – not in favour of this site as it is on the opposite	Bradford MDC
		side of the road to the existing house and would create a precedent	should use the
		for further building on other fields along this road.	brownfield sites
		W/H013 Moorside Farm – this is a continuation of the approved sites	around the City
		around Moorside Farm and I therefore feel any further building	before requiring
		should be limited to 20-30 homes maximum.	greenfield sites.
		This would give approx 106 buildings in total and together with	greeriileid sites.
		those already built would be 188 which I hope would be sufficient for	
		planning needs.	
		The site on Royd Street (further along from the co-op) should be	
		used for housing. Instead of being allowed to be derelict and an	
		eyesore.	
		Bradford MDC should use the brownfield sites around the City before	
		requiring greenfield sites.	
W/HO6: Haven	Coal Authority	The Coal Authority notes that Section 2.3 of the Plan relates to	Noted.
Farm, Station	Coal Additionly	Housing Allocations with Policy W/HO6 indicating that residential	Noteu.
Road, Harecroft		development at the Haven Farm site at Station Road, Harecroft (for	
Todu, Halboott		approximately 35 dwellings) will be supported.	
	Judy Caunt	Brownfield site for 35 dwellings should be first site to use.	Agreed.
	John Rose	Can see logic in building here, improvement of chicken factory smell	This general
	JOHN 11036	Oan 300 logic in building here, improvement of chicken factory sinell	support for this
			Support for tills

	Eugene Harrison Joy Harrison	In reference to the community recreation facilities what does this entail? I would appreciate some feedback please. I am not in favour of a play area on Station Road as I am afraid this will cause the same problems that Wilsden, Cullingworth and Harden have. I also feel that there is insufficient demand from its intended target group. However, some small garden, bench, planter etc. would be nice. I would prefer money was spent on speed cameras.	policy is noted and welcomed. To be considered with the Steering Group. To be considered with the Steering Group. Group.
W/HO7: Windfall Housing Sites	No comments received		
W/HO8: Housing Mix	Avant Homes	Agrees that a mixture of housing types and sizes should be provided as part of new developments. Market forces should dictate the type of housing that is required in the area as this is likely to fluctuate over the plan period and greater flexibility should be provided within the policy. Consideration must be given to the repercussions of providing a range of house types and sizes on the viability of proposed developments it is recommended that a caveat is added to the policy, which makes it subject to viability. It is not considered that the policy fully accords with the adopted Core Strategy and as such fails to meet the requirements of paragraph 184 of the NPPF. However, it is considered that this could be rectified with the amendments to the policy suggested above.	The support that a mixture of housing types and sizes should be provided as part of new developments is welcomed. It is agreed to give more flexibility to reflect any changes that may take place over the life time of the Plan; also, to refer to viability.

	David Wilson Homes	DWH agree with the first element of the policy which seeks to ensure that housing developments provide a mix of housing types to meet the existing and future housing needs of the Parish. However, DWH do object to the element of the policy that seeks to dictate that all developments of more than 3 dwellings should include no more than 35% of properties with more than 3 bedrooms. Whilst DWH support the intention of the policy to meet the housing needs of young families and older people, they believe the policy is too restrictive as currently worded. To ensure that development sites remain viable over the course of the whole plan period to 2030 developers need to be given as much flexibility as possible in order to react to market demand. The ability of developers to sell homes is the core driver associated with the viability of housing developments.	The support that a mixture of housing types and sizes should be provided as part of new developments is welcomed. It is agreed to give more flexibility to reflect any changes that may take place over the life time of the Plan; also, to refer to viability.
	Martin Guest	Policy W/H08 - housing mix - I suggest the size of the houses is as important as the number of bedrooms. Many modern houses are the size of a shoe box! Floor area would be a more suitable measure. Too small is as bad as unduly large. I refer to Policy W/H01. I suggest policy W/H08 be re-phrased. I have spoken to a number of Lane Side residents who see themselves as being powerless to do anything to modify or prevent undesirable housing developments, and suggest this is extremely unhealthy.	While the Steering Group has some sympathy it what you are suggesting, national rules concerning the development of neighbourhood plan mean that it is unlikely that a policy which sought to introduce a minimum size of a house would appropriate.
W/HO9: Affordable Housing	Avant Homes	The policy as currently drafted as it seeks provision of "at least 20-25%" affordable housing on developments of 10 units or more. This conflicts with Policy HO11 of the adopted Core Strategy, which	Agreed. The Policy and supporting text

		seeks "up to 20%" provision in towns, suburbs and villages, which includes Wilsden. We would also advise that a caveat is added to the policy which states that the provision of affordable housing is subject to viability and is open to negotiation	will be amended as you suggest.
	David Wilson Homes	Whilst DWH support the delivery of affordable housing, they believe the policy as currently worded is not in accordance with the Bradford Core Strategy which requires the delivery of 20% of affordable homes on new housing developments in Wilsden.	Agreed. The Policy and supporting text will be amended.
	Martin Guest	Policy W/H09 - affordable housing - I cannot find a reference within the plan to what this means. Unless this is specified in some form, the figure of 25% is meaningless.	Agreed. The Plan will define what is meant by 'affordable housing' based on BMDC's definition.
W/BH1: Locally Designated Buildings of Special Historical and Architectural Interest	Historic England	We welcome the introduction of the list and policies relating to non-designated heritage assets. Suggest that the title of Table 1 and policy 'W/BH1' use the same description (pg.26); we suggest "Locally designated building and sites of special historical and architectural interest". 'Sites' as there may be non-archaeological sites within the NP area which have been identified through the West Yorkshire Archaeological Services Historic Environment Record, and a policy which takes account of such known sites, as well as those which may emerge when a site is being developed would be welcomed.	Agreed.
W/BH2: Wilsden Conservation Area	No comments received		
W/BH3: Hallas Bridge, Birkshead and Norr Special Character Areas	Historic England	We welcome the identification of Special Character Areas and related policy 'W/BH3' with the wider Neighbourhood Plan Area, as well as the proposal that Bradford Council consider the designation of the Hallas Bridge Area as a Conservation Area.	This support is noted and welcomed.
	Judy Caunt	I am in favour of the Hallas Bridge area becoming a Conservation Area and would wish to protect the area surrounding Birkshead and Norr.	This support is noted and welcomed.
	Astrid Hansen	One factual correction to the Birkshead Special Character Area is that Birkshead mill is not the first in the parish. All the mills in the	Agreed.

		Hewenden valley are earlier, as is Albion Mill.	
W/BH4: High Quality Design Principles	Avant homes	Unclear as to whether it applies solely to new development within the Conservation Area or the village as a whole.	We can confirm that it relates to the whole of the village. This will be made more explicit.
	David Wilson Homes	DWH fully support the proposed development principles identified in Policy W/BH4. As a house builder that prides themselves in the delivery of high quality residential developments, many of the principles identified in the policy align with their own.	This support is noted and welcomed.
	Judy Caunt	Emphasis should be on the traditional materials characteristic of the area.	Agreed.
W/BH5: Dry- Stone Walls	Judy Caunt	Every effort should be made to protect these walls as they are important to the local area.	This support is noted and welcomed.
W/NE1: Important Local Green Spaces	Gladman	Due to the lasting nature of this designation and the level of protection of these designations, similar to that of Green Belt, Gladman contend that robust evidence should support such a policy. Gladman contend that the evidence to warrant the inclusion of such a policy should be extremely robust and having not currently seen any evidence to support the inclusion of the designations in the policy recommend it is deleted from the plan. The map outlining the proposed designations is unclear however it appears that some of the designations may not be meeting all of the criteria for LGS designation.	It can be confirmed that each site has been assessed against the NPPF criteria. This will be detailed in a separate report. A more detailed map will be provided.
	Judy Caunt	Should be protected at all costs.	This general support is noted and welcomed.
W/NE2: Ecology and Biodiversity	Gladman	Generally support the Parish Council's ambition to improve the biodiversity assets of the neighbourhood plan area, this policy should not prevent the delivery of sustainable development opportunities being delivered where these would lead to enhanced or improvements to biodiversity assets and landscape features or improve existing assets. The loss of some features may be required to ensure the deliverability of a development proposal overall and in	Agreed. The supporting text will be amended to reflect this.

		these circumstances it is quite often the case that the loss of biodiversity assets will normally be compensated for through the replacement of similar features within a development proposal.	
W/NE3: Trees	Judy Caunt	Should also be protected and further planning as appropriate.	This support is noted and welcomed.
	David Wilson Homes	DWH support this policy as it will ensure that proposed developments mitigate any landscape and visual impact they could have.	This support is noted and welcomed.
W/NE4: Landscape	David Wilson Homes	DWH support this policy as it will ensure that proposed developments mitigate any landscape and visual impact they could have.	This support is noted and welcomed.
W/NE5: Important Open Views and Vistas	Gladman	Gladman consider that this policy lacks sufficient evidence to demonstrate why these views are of such value to the local community. Opinions on landscape are highly subjective, therefore, without further evidence to demonstrate why these views are considered special will likely lead to inconsistencies in the decision-making process. Gladman consider that to be valued, a view would need to have some form of physical attribute. This policy must allow a decision maker to come to a view as to whether particular locations contains physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support. An area's pleasant sense of openness to open countryside cannot on their own amount to a landscape which should be protected.	Your concerns about the lack of sufficient evidence are noted. We consider that sufficient evidence has been provided. It is agreed, however, to produce a separate supporting evidence report which will underline their importance.
	Martin Guest	Open views and vistas - I request that the view south from Lane Side be added to those shown in figure 9. Many walkers use Lane Side and obviously derive benefit from the current open aspect and views to the south. It would be regrettable for these benefits to be reduced. A photo showing views south from Lane Side would enhance the Plan. See section 4.4.	To be considered by the Steering Group.
W/NE6: Areas of	Gladman	As Wilsden is currently surrounded by Green Belt, the very purpose	The Policy was

Local Separation		of which is to prevent coalescence of settlements it is not clear why this policy is deemed necessary or what further detail this policy provides beyond that of the higher level national Green Belt designation. As Green Belt protection has been recently reaffirmed in the published Housing White Paper it is considered this policy is unnecessary and should be deleted. The policy does not reflect the criteria set out for development in the Green Belt from the Framework, in very special circumstances and as such may undermine this national policy designation.	introduced to reflect concerns that while development in the Green Belt is strictly controlled and only allowed in special circumstances, there are instances where some types of development appropriate in the Green Belt such as infill housing was eroding the physical separation of the
	David Wilson Homes	DWH support the intention of the policy, however, they believe that national and local planning policy guidance in relation to the Green Belt will provide sufficient protection. Specifically, as one of the five purposes of the Green Belt is to restrict urban sprawl. The current extent of the Green Belt beyond DWH's site would of course be retained should the site be allocated for residential development.	communities. The Policy was introduced to reflect concerns that while development in the Green Belt is strictly controlled and only allowed in special circumstances, there are instances where some types of development appropriate in the Green Belt such as infill housing

	Judy Caunt Martin Guest	Of major importance to retain the physical and visual separation between Wilsden and the surrounding communities. Policy W/NE6 - development in area WI/009 would diminish the separation between Wilsden and Harecroft. I request that the	was eroding the physical separation of the communities. This general support is noted and welcomed. To be considered by the Steering
W/E1: Existing Employment	No comments received	separation between Wilsden and Harecroft be added to the list shown in section 4.6 of the draft plan.	Group.
Sites W/E2: New Business Development Proposals	No comments received		
W/CF1: Community Facilities	John Rose	Wilsden services at breaking point - schools and doctors	Noted.
W/CF2: Community Facilities	Martin Guest	Wilsden School - The joint efforts of developers and CBMDC have resulted in radical changes to the character of the village. No solution is proposed to the problems of traffic and parking congestion in the vicinity of the school. The school is adjacent to the centre of the village and an ideal site to build houses. The other proposed sites are some way from the village centre. Would it not be sensible to build a fresh school either at the Ling Bob roundabout or on the land between the bottom of the village and Harden, and then build the houses on the existing school site? This would solve the parking/congestion problem and put the houses adjacent to the village centre in line with policies W/SH4, W/TA3, while avoiding the need for additional cycleways in line with policy W/TA2. I am sure this would be a somewhat costly solution; however the alternative would appear to fail to address the current parking problems, while placing additional housing in unsatisfactory locations. If CBMDC require the additional houses to be built, surely it is reasonable for	To be considered by the Steering Group.

		them to shoulder some of the financial burden.	
	David Wilson Homes	DWH support the policy and believe that the delivery of new homes at the scale they propose will deliver significant benefits associated with the safeguarding and enhancement of new community facilities.	This support is noted and welcomed.
W/CF3: Community Sports Facilities	D Wells	The need and desire for the delivery of new facilities for Wilsden AFC is significant for many residents of the Village. The club's many teams do not currently have any pitches of their own in the Village. At present, they drive 30 minutes to play their "home games" and have to find available pitches on a week to week basis.	Noted
	David Wilson Homes	DWH are in full support of these policies on account of their proposal to deliver new facilities for Wilsden AFC. As stated above, no other development site can deliver the desired new sporting facilities for Wilsden AFC. The health and community benefits associated with the delivery of the new facilities for Wilsden AFC would provide huge benefits to the Village.	Noted
W/CF4: Assets of Community Value	No comments received		
W/SH1: Wilsden Local Centre	No comments received		
W/SH2: Shops Outside Wilsden Local Centre	No comments received		
W/SH3: Shop Front Design in Wilsden Local Centre	No comments received		
W/SH4: Car Parking in Wilsden Local Centre	No comments received		
W/TA1: Transport	Martin Guest	The proposed development WI/009 is beyond easy walking distance of the village shops. Development at the Ling Bob roundabout would be much more appropriate. The proposed development at Haven Farm would, for most people, require motor transport anyway in order to access shops etc	Disagree. It is considered that the NPPF supports it. The proposed limit on

			the size of a site specific development was a high priority of the community as evidenced by community consultation.
	Martin Guest	While the draft plan references traffic and congestion on Main Street, I request that the traffic flow on Haworth Road and Lane Side should also be considered. Haworth Road is not too bad, however traffic along Lane Side towards Cullingworth can sometimes move at very high speed. The problem is that a minority of drivers see the clear, straight road as an opportunity to put their foot down. Traffic moving from Cullingworth to the Ling Bob roundabout does not move so fast, however there have been numerous occasions when I have nearly been hit when exiting my drive due to the limited visibility towards Cullingworth and the traffic travelling towards Bradford. Development of area WI/009 would exacerbate this problem.	Noted.
	David Wilson Homes	DWH's proposed development site is situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services.	Noted.
W/TA2: Footpaths, Cycleways and Bridleways	David Wilson Homes	The proposed development masterplan identifies that a network of roads is showing a clear hierarchy and providing suitable permeability. In addition, pedestrian and cycle connectivity will be provided to enhance the site's accessibility by non-car modes to the services and facilities available within walking and cycling distance of the site.	Noted.
W/TA3: Traffic Along Main Street, Wilsden	David Griffin	We are all aware of the continuing concerns of the residents of the speed of which vehicles continue to use Main Street despite the existing speed reduction measures in place. I consider it may be appropriate to modify the last paragraph to read: "Local people have expressed concerns about road safety, noise and vehicle emissions associated with the volume, speed of traffic and non-effective speed calming measures along Main Street"	It is agreed to refer to the existing speed reduction measures and their partial success (or not).
W/DC1: Developer	David Griffin	Wilsden's existing services infrastructure, in particular surface and foul water services, can at present only just cope with the housing	To be considered by the Steering

Contributions		developments that have been added to the Parish over the last 20 years or so. Flooding of Main Street adjacent to Well House Mill being a particular case in point. The Beck is expected to deal with the surface water run off due to lack of road gulley's and the result of hard standing for off road parking that has reduced garden frontages. The gardens of properties adjacent to the Beck down Crack Lane have been affected during periods of heavy rain with foul water contaminating the gardens and resulting in clean-up operations by Bradford Council. I understand the problem has been investigated by Yorkshire Water and work is ongoing to resolve the matter, but it shows how near to capacity the infrastructure is in Wilsden, especially surrounding Main Street. I consider it may be appropriate to include the following paragraph: * Investment in projects to improve the existing services infrastructure i.e. Electricity, Water, Gas, Telephone, Data and Surface and Foul water services to support the proposed developments	Group.
	Martin Guest	Developer Contributions should include local infrastructure improvement, including parking provision for the village school and modifications to the traffic calming speed cushions on Main Street. I refer to policy W/TA3.	It is agreed to refer to local infrastructure, including along Main Street. It is not considered appropriate, however, to specifically highlight the issue of parking provision for the village school.
	David Wilson Homes	DWH support the proposed policy and believe that this adds further weight to the proposed allocation of their site to meet the outstanding housing needs of the Village, ahead of other smaller, piecemeal, developments.	Noted.

Wilsden Parish Neighbourhood Plan Policy No.	Respondent	Main Comments	Response
Community Action 1: Housing Allocations Within the Green Belt	Maureen Bradley	Site w1/009 We wish to object to the proposal to build houses on the field marked w1/009 on the plan shaa3 2015. The field in question is located between two well established farms. To effect housing between these fields will be detrimental to livestock in my opinion. Each house will be designated as a parking space adding to the already congested infrastructure. Adding additional traffic from new housing will only add to the congestion.	To be considered by the Steering Group.
	Ann Gill	I am writing to formally object to the proposed development. I own New Holland Farm Wilsden, which is a large working farm of approx. 600 sheep and lambs and poultry. The impact of this development on our livestock and businesses would be huge. It would open the floodgate for further development. We are upset that housing needs and being put above local environment and agricultural businesses, which contribute greatly to the local economy.	To be considered by the Steering Group.
	Susan Marshall	W1/009. This is in the centre of green farming land on either side and doesn't make any sense. W1/013 makes more sense.	To be considered by the Steering Group.
	Frieda Clapham	Laneside cannot cope with more traffic. Parking in the village is getting difficult. Can the school and medical centre cope with more pressure. Laneside has a very valuable farm. If this is affected we have lost something very special and irreplaceable.	To be considered by the Steering Group.
	Honeypot Farm	The proposed development of this Green Belt land would quite seriously alter the landscape of the countryside. I am also quite worried about the impact the building of these houses would have on our family run farm.	To be considered by the Steering Group.
	Geoffrey Haigh	The proposed development on the opposite side of the road to the existing houses. It breaks up the green fields. It sets a precedent for further building along that side of Laneside. This would be the thin edge of the wedge.	To be considered by the Steering Group.
	Roland Kaye	I fully understand the pressure on the Parish Council. Laneside is A NATIONAL ROAD, and now very busy. The speed of vehicles has	To be considered by

	increased lately and could be a danger to further housing occupants. Laneside A national road traffic has increased significantly in the last couple of years and a small number of drivers are now driving at high speeds (I conservatively estimate at up to 70 mph). It seems that BMDC are aware of this. However, allegedly they comment that "until a death or a serious incident occurs. No action will be taken".	the Group.	Steering
Roland Kaye	I have serious concerns about the housing development, in particular W1/009, and I look forward to your comments on the following issues. 1) This location (W1/009) is adjacent to the National Road B 6144, on a section of approximately 1/4 mile of straight road. Over the last few years, traffic has increased significantly on this section of road. Despite my pleading with the Parish Council, and Bradford MDC, concerning excessive speeds of vehicles occurring on the road (60 + mph) nothing has been done, and "allegedly" Bradford MDC say that "No traffic calming would be done until a serious incident or death occurs". Speed cameras would stop all this, or speed cushions and tables would dramatically reduce speeds towards the 30 mph limit which exists on this road. 2) It has been noticed by me that elderly and young cyclists are using the pavements at this location, probably because they are frightened of the speeding traffic. 3) In the light of the above, it would be very difficult and dangerous for traffic to exit the proposed development (W1/009). Please confirm whether or not, these points have been discussed in Council Meetings, and if action has been taken to resolve these issues. 4) Finally, I understand that Green Belt land has in the past, been earmarked for a large proportion of houses in Wilsden, including 268 homes in Harden Lane and Bents Lane.	To conside the Group.	bered b Steering
Andrew Gill	I am not sure this is sensible on this plot of land as it is right in the middle of working farms. The fields directly adjoining it on three sides are lambing and calving fields. Developments brings families, dogs, children, cars and along with it noise and pollution. This could cause major disruptions and stress to the birthing mothers and possibly result in miscarriages or stillbirths. Our direct neighbours have other animals such as Turkeys which arrive from October and also chickens all year round. All this animal husbandry brings with it undesirable pests such as large amounts of rats and vermin. We are constantly fighting to keep	To conside the Group.	bered b Steering

	the foxes away from livestock and the foxes will probably be even more attracted to the area with all the bins and rubbish that is produced by developments. Not to say the fright it will cause to residents to see the size of the rats around here. Farming is a very important part of our livelihoods and disruptions such as developments so close to the heart		
	of the farms could be disastrous.		
Sharon Gill	I have to say I was quite shocked. I have lived at this property for the last 17 years and this is the very first time I have heard anything about this site being used for building. It is greenbelt, it has been greenbelt for hundreds of years and an area of it is currently being used for grazing horses. I have had no paperwork or notifications to advise me of any interest in this area and yet I am directly associated with it, being at the end of my drive. I am aware of the other sites on the plan and have been for several years. But I am not sure how it benefits to pluck a field out of the middle of other fields and develop it. Once greenbelt has been developed it will never exist again. The soils in these greenbelt areas have taken millennia to develop into the lush pastures they are today. Absolutely essential pathways between areas of green for hundreds of species of wildlife. We have hares, curlews, hedgehogs, stoats, voles, butterflies, bees, chaffinches, goldfinches, redstarts, sparrows, nesting swallows and house martins, bats, toads and many more all travelling between these areas. Curlews have been arriving steadily over the last five years in all the fields around this area and they are very much in decline losing much of their habitat to development. Building houses and bringing in all the noise and disruptions it will cause, right in the middle of the breeding/nesting areas, is sure to kill them off completely. We thought this was the whole point of Greenbelt Protection, surely. All the farmers adjoining this plot have offered to buy the land from the owner as he has not lived in this area for a number of years. The farm next door to us directly adjoins this land and he has to transport his sheep to areas in Cullingworth for extra grazing land. We have offered to buy this field to graze our horses when we first moved in and we had to rent land up near The Guide instead. It is getting to the stage where farmers do not sell land to graze our animals but to developers. Ultimately we will have no fields	To considered the Stee Group.	be by ring
	1 suppossery require those houses. There are huge areas of brownhead		

sites in Central Bradford that could be developed like they have in London. That way people who work in the city could live in the city, like they do in London, and that would cut down on traffic and congestion, fumes, air pollution etc. Many people do not like the dust, rats, mice, fleas etc. that living in and around working farms brings in and city dwelling is a popular choice given the options. We simply cannot keep churning up precious resources like Greenbelt land. There is also an issue with the traffic on Laneside. it is a major route for commuting traffic who do not live in the village but use it as a shortcut. The huge housing development in Cullingworth has yet to show its impact on our road networks. I had to get out of my drive directly on to Laneside every morning for the school run for 10 years and believe me at 7am to 9.00am it was a nightmare. Huge amounts of traffic comes from Cullingworth to Bradford and from Bradford to Parkside and Cullingworth Primary Schools at that time in a morning and houses built on Laneside will only exacerbate it. There are no facilities in the village for an extra amount of people. The Co- Op is dreadful to park outside, it is extremely difficult to get a doctor's appointment, the dentist doesn't take any more local NHS patients, we have to travel to Cottingley(again more traffic). The library and post office is only open because local volunteers staff it just to provide a service. The yoga class had to go to Harden due to lack of facilities. Wi- Fi in this area is very slow and the pylons which overlook the whole site make a dreadful constant buzzing noise which takes years to get used to ,never mind the ill heath associated with it. All these points came out according to your website where I found documents pertaining to be from various surveys carried out. None of us in the farms on Laneside know about these. It seems to have been put forward in a meeting in 2014, that none of us attended, and none of us know who put the site (W1/009) forward. Architects in London are looking at exciting new developments in the cities based on Scandinavian designs where they incorporate areen spaces/parks/restaurants/shops all based in one development, almost building a whole village utilising brownfield sites, whilst being within walking distance of facilities that cities offer such as theatres, cinemas, hospitals etc. Bradford has some beautiful heritage buildings that would be perfect for this. For these reasons we are totally against the development on Laneside (W1/009)

Kay Mars	W1/009 and W1/013 for the following reasons: 1.This land is agricultural land and green belt. 2.The plot w1/009 is surrounded on three sides by fields that are owned by both Honey Pot Farm and New Holland Farm. Sheep graze on these fields throughout the year. 3. One of the farmers informed me that sheep will not graze happily it houses are built around them. 4. Farmers are having a particularly hard time due to Brexit. 5. These fields have been farmed for generations and is part of our heritage. 6. Laneside is a very narrow road with only a pavement on one side. Also, there is regular speeding. 7. Laneside is therefore not a viable or safe highway for all the extra traffic a new housing development will generate.	To be considered by the Steering Group.
Mr. and Gill	Mrs. S I am writing to view my objection to the proposal of the inclusion of land w1/009 on the above plan. The land is marked as Green Belt and is surrounded by farm which use their land for farming activities. The use	To be considered by the Steering Group.
Derek W	ells In addition to being a local resident, my interest in the Neighbourhood Plan is also associated with my role as the landowner of David Wilson Homes' land interest at Harden	To be considered by the Steering Group.

Wilson Home is approximately 17 hectares in size. Of the 17 hectares, I have offered as part of the proposals to provide a total of 7 hectares to be developed to deliver new facilities for Wilsden AFC. Which is a significant proportion of my land. I consider this to be a rather unique offer and I am unsure of any other similar offers that have recently been made in the Village and wider area.

As a resident of the Village I am aware of the current plight of Wilsden AFC. I therefore made the early decision that I would very much like to provide as many benefits as possible to the Village though the release of my land. Which is why I would like a significant proportion of my land to be delivered as new facilities for Wilsden AFC. Rather than hold onto any future development potential it may have.

The need and desire for the delivery of new facilities for Wilsden AFC is significant for many residents of the Village. The club's many teams do not currently have any pitches of their own in the Village. At present, they drive 30 minutes to play their "home games" and have to find available pitches on a week to week basis. The release of my land to enable the delivery of the desired facilities will help to eradicate the current issues faced by the Club.

I appreciate the Parish Council's decision to identify potential housing sites to be released from the Green Belt. However, I am concerned that my land has not been chosen given the many social and community benefits it can provide to the Village. Particularly, as my land is the only land that can deliver the desired facilities for Wilsden AFC due to land availability, topography and funding.

I fully understand that there may be future potential to develop my land after 2030, within the next local plan period. However, I do not think the poten1'1al to provide new facilities for Wilsden AFC will be. If their current struggles to find pitches for home games continue, who is to say that the club will still be operating in 13 years' time? In my role as landowner of the Harden Lane/Bents Lane site, I request that the Parish Council re consider their current proposals in the Neighbourhood Plan and identify my site as the preferred

	housing option for the Village. Especially, given the unique and huge benefits it can provide to many residents of the Village.		
lan Ruthver Stephanie Ruthven, Michael Ruthver and Sar Ruthven	also associated with my role as the Managing Director of David Wilson Homes, Yorkshire West Division, who as you will be aware are promoting a land interest at Harden Lane/Bents Lane, Wilsden (Ref. WI/001) for residential	To considered the Stee Group.	be by ring

David Wilson	30 minutes to play their "home games" and have to find available pitches on a week to week basis. I know from first-hand knowledge the stress and frustration that this can cause the club's players, parents, committee, and coaches. Which is a key factor behind why David Wilson Homes' proposals are unanimously supported by the club. Importantly, my company's proposal is the only one that can deliver the desired facilities for Wilsden AFC due to land availability, topography and funding. Without the release of my company's site interest at Harden Lane/Bents Lane for residential development the opportunity to deliver the new facilities for Wilsden AFC will be lost until at least 2030, after the current plan period. There is no public funding available and the club do not have the funds to purchase the required area of land or indeed to deliver the new facilities. The package of benefits being offered by my company's site is unrivalled when measured against those which other proposed developments of the Village can offer. Through my role as Managing Director I will ensure that the development proposals would be of the highest quality, would deliver first class facilities for Wilsden AFC and would truly be to the advantage of the Village. Importantly, I will also commit to undertaking a comprehensive community consultation programme with the Parish Council and existing residents to ensure that the development proposals would take into account any concerns raised. I would welcome the opportunity to meet with the Parish Council again to discuss the points raised in this letter. In the meantime on behalf of myself and my household I ask you to consider the contents of this letter alongside the representation from David Wilson Homes before finalising the WNP. Should you need any further information please do not hesitate to contact me	То	be
Homes	benefits that they can deliver to Wilsden. You will recall that DWH provided the Parish Council with a presentation on the 19th July 2016 in respect of their proposed development of Site Ref. WI/001. The presentation provided the following information:	considered the Steer Group.	by

- A background to DWH, their focus on design quality and importantly their local connections to the Village;
- How the development of the site would be in keeping with the objectives of the Bradford Core Strategy;
- The ability of DWH's development proposals to deliver a muchneeded new home (playing pitches and changing facilities) for Wilsden Juniors AFC, and how DWH's site is the only site in the Village that can deliver this.
- The benefits associated with the delivery of new homes in the Village in respect of: o 25% of future Community Infrastructure Levy monies:
 - o Affordable housing;
 - o New construction employment opportunities; and
- o The safeguarding and enhancement of local services and facilities.
- · How the neighbourhood plan process could be used by the Parish Council to ensure the delivery of the aspirations of the whole Village, even if this resulted in an increase of homes above that prescribed by the Bradford Core Strategy. However, it is our view that the only potential housing site that can deliver the visions and objectives of the WNP is DWH's site at Harden Lane/Bents Lane. We acknowledge that the Parish Council would prefer that the outstanding housing needs of the Village are met through piecemeal, small-scale, developments. However, we do not believe that this approach will deliver the visions and objections of the WNP. More importantly, it will not enable the delivery of the desired new facilities for Wilsden AFC. Whilst the Parish Council may not have decided to pursue the allocation of DWH's site on account of its size and the potential for it to deliver a number of new homes in excess of that prescribed by the Bradford Core Strategy. It is important to stress here that Paragraph 184 of the NPPF identifies that Neighbourhood Plans can promote additional development to that prescribed in the Local Plan, especially where development proposals can be considered to achieve the NPPF's principles of sustainable development. In accordance with Paragraph 184 of the NPPF, it is our strong belief that DWH's proposed development at Harden Lane/Bents Lane would ensure that the Village gets the right types of development for their community; would still be in

	general conformity with the Bradford Core Strategy; and would not promote less development than set out in the Bradford Core Strategy. We therefore believe that the WNP should be amended to replace all of the current proposed housing allocations of the WNP with DWH's proposed development at Harden Lane/Bents Lane (Site Ref. WI/001) in order to meet the housing needs of the Village; deliver the desired new facilities for Wilsden AFC; and to provide additional benefits associated with the delivery of one larger housing site. Our clients are therefore very keen to continue their engagement with the Parish Council in order to assist in the preparation of a sound and robust Neighbourhood Plan which complies with national planning legislation and policy guidance.	
David Wilson Homes		To be considered by the Steering Group.

basis. The new facilities that DWH are seeking to deliver will include new pitches, changing facilities and car parking. The club's committee, coaches, players and parents are unanimously behind the proposals. Proposals which cannot be delivered without the release of DWH's land on account of: -

- The area of land needed to deliver the facilities:
- The gradient of land needed to deliver the facilities; &
- The funding that will be provided through the delivery of DWH's proposed residential development.

Without the release of DWH's Site Ref. WI/001 for residential development the opportunity to deliver the new facilities for Wilsden AFC will be lost until at least 2030, after the current plan period. As there is no public funding available to purchase the required area of land or indeed to deliver the new facilities.

With regards to the proposed residential development at the site, DWH intend to deliver a secure and sustainable development of modern family homes in a safe, green and welcoming environment. The following points summarise the initial design concepts for the Site: -

- A high quality, low density, development proposal which respects the character of the Village.
- Significant public open spaces to form a multi-functional landscape network.
- A sensitive scale and form of development.
- Creation of green networks/landscape planting along the site's northern boundary in order to ensure the delivery of a long-term defensible boundary to the site and the Village.
- Buffer planting along the Site's boundaries with existing residential properties to mitigate any perceived loss of amenity.
- The safeguarding of existing areas of landscape and biodiversity value within the development proposals.

 Strategy > Partnership > Delivery
- A network of roads showing a clear hierarchy and providing suitable permeability.
- Pedestrian and cycle connectivity will be provided to enhance the site's accessibility by non-car modes to the services and facilities available within walking and cycling distance of the site.

The illustrative masterplan scheme can deliver between 100 to 200 dwellings at a density of 25 Dwellings per hectare. The total number of homes to be provided at the site would be commensurate with any decisions taken by the Parish Council in respect of the future housing and development needs of the Village.

The delivery of the higher proposed level of homes will of course enable the full provision of the proposed facilities for Wilsden AFC, alongside the delivery of a proportionate uplift in benefits associated with the delivery of new homes.

Which in respect of the WNP would include the provision of 25% of any Community Infrastructure Levy (CIL) payments from the site to the Parish Council. Based on an average house size of 90.sqm, a CIL charge for Wilsden of £20sq.m and the Bradford Core Strategy affordable housing requirement of 20% on site, DWH's development proposals could deliver a CIL payment of up to £288,000 (based on 200 homes). Which of course is another important factor that should be taken into consideration when deciding on whether the full extent of DWH's development proposals should be supported.

With regards to the site's current location within the defined Green Belt, we believe that DWH's Site Ref. WI/001 does not currently fulfil any of the NPPF's five Green Belt purposes for the following reasons: -

- The development of the site would not result in unrestricted urban sprawl due to the masterplan vision of delivering a landscape led scheme that delivers new strong defensible landscape boundaries on the site's northern and western boundaries (through the new Wilsden AFC facilities); retains existing biodiversity features within the site; and delivers strategically placed on-site open space.
- The development of the site would not result in the merging of adjacent settlements as the nearest detached settlements to the site are Cullingworth to the west and Harden to the north, the proposed enhanced defensible boundaries and existing landscape features will ensure coalescence is prevented.
- The site does not assist in safeguarding the countryside from encroachment on account of the significant areas of open countryside that exist to the west and north of the site, along with the defensible boundaries created by Harden Lane to the east and Bents Lane to the north.

	Robert Leach	 The proposed development of the site will have no detrimental effect on the setting and special character of historic features as there are no assets of historical value located within proximity of the site. The fifth purpose of Green Belt to assist in urban regeneration, by encouraging the recycling of derelict and other urban land is a general purpose which will not be adversely affected by the site. Further to the above, in accordance with Footnote 11 of Paragraph 47 of the NPPF, we believe that the site can be considered a Deliverable residential development site. I am writing as a local resident of the village in response to the draft Wilsden Neighbourhood Plan (WNP) published for consultation in June 2017. My main objection to the plan is the building of housing at Laneside site ref. WI/009 which Bradford SHLAA identifies as a potential development of 62 homes. The site lies to the south of Laneside and is outside of the village's current boundary. The site is not in keeping with current settlement from the village as it protrudes to the south of Laneside. The site would create an adverse landscape and visual impact on the areas of Green Belt and surrounding area. In my opinion, site ref. WI/001 land at Harden Lane/Bents Lane is by far a more suitable place for development. I am aware that the residents of Wilsden have not been allowed to attend any of the Neighbourhood Planning meetings, and that the proposed areas for development have been allocated on a points system. I would welcome the opportunity to view this points system to understand why WI/009 is a preferred option to WI/001. 	considered by
	John Rose	Why put a development in the middle of farming land? it will 'blend' with nothing!	To be considered by the Steering Group.
Community Action 2: Hallas Bridge Conservation Area	Historic England	We welcome the proposal that Bradford Council consider the designation of the Hallas Bridge Area as a Conservation Area.	This support is noted and welcomed.