

HAWORTH, CROSS ROADS & STANBURY NEIGHBOURHOOD PLAN

Submission Draft Version

**A report to the City of Bradford Metropolitan
District Council**

into the examination of the

**Haworth, Cross Roads & Stanbury
Neighbourhood Plan**

by Independent Examiner, Rosemary Kidd

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1.0 Summary

- 1.1 The Haworth, Cross Roads & Stanbury Neighbourhood Plan has been prepared to set out the community's wishes for the three villages in Haworth, Cross Roads and Stanbury parish.
- 1.2 I have made a number of recommendations in this report in order to make the wording of the policies and their application clearer, including improvements to the mapping of sites referred to in policies to ensure that the Plan meets the Basic Conditions. Section 6 of the report sets out a schedule of the recommended modifications.
- 1.3 The main recommendations concern:
 - The inclusion of a section in the Introduction setting out the strategic framework for the Plan;
 - The amalgamation of policies to avoid unnecessary repetition;
 - The deletion of Policy HT4;
 - Clarification of the wording of policies and supporting text;
 - Ensuring that the boundaries of sites are clearly shown on the Policies Map or background evidence.
- 1.4 Subject to the recommended modifications being made to the Neighbourhood Plan, I am able to confirm that I am satisfied that the Haworth, Cross Roads & Stanbury Neighbourhood Plan satisfies the Basic Conditions and that the Plan should proceed to referendum.

2.0 Introduction

Background Context

- 2.1 This report sets out the findings of the examination into the Haworth, Cross Roads & Stanbury Neighbourhood Plan.
- 2.2 The Parish of Haworth, Cross Roads & Stanbury lies 3 miles to the southwest of Keighley and 10 miles west of Bradford. The parish lies in the Worth Valley amid the South Pennine hills. Haworth is a tourist destination known for its association with the Brontë sisters and the preserved heritage Keighley and Worth Valley Railway. At 2011 there were 6994 people living in 6916 households in the parish.

Appointment of the Independent Examiner

- 2.3 I was appointed as an independent examiner to conduct the examination on the Haworth, Cross Roads & Stanbury Neighbourhood Plan (HCR&SNP) by the City of Bradford Metropolitan District Council (CBMDC) with the consent of Haworth, Cross Roads & Stanbury Parish Council in April 2020. I do not have any interest in any land that may be affected by the HCR&SNP nor do I have any professional commissions in the area currently and I possess appropriate qualifications and experience. I am a Member of the Royal Town Planning Institute with over 30 years' experience in local authorities preparing Local Plans and associated policies.

Role of the Independent Examiner

- 2.4 As an independent Examiner, I am required to determine, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether the legislative requirements are met:
- The Neighbourhood Development Plan has been prepared and submitted for examination by a qualifying body as defined in Section 61F of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004;
 - The Neighbourhood Development Plan has been prepared for an area that has been designated under Section 61G of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004;
 - The Neighbourhood Development Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004, that is the Plan must specify the period to which it has effect, must not include provisions relating to 'excluded development', and must not relate to more than one Neighbourhood Area; and
 - The policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of the Planning and Compulsory Purchase Act 2004 Section 38A.

- 2.5 An Independent Examiner must consider whether a neighbourhood plan meets the “Basic Conditions”. The Basic Conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The Basic Conditions are:
1. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 2. the making of the neighbourhood plan contributes to the achievement of sustainable development;
 3. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 4. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
 5. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The following prescribed condition relates to neighbourhood plans:
 - Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended by the Conservation of Habitats and Species and Planning (various Amendments) Regulations 2018) sets out a further Basic Condition in addition to those set out in the primary legislation: that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.
- 2.6 The role of an Independent Examiner of a neighbourhood plan is defined. I am not examining the test of soundness provided for in respect of examination of Local Plans. It is not within my role to comment on how the plan could be improved but rather to focus on whether the submitted Neighbourhood Plan meets the Basic Conditions and Convention rights, and the other statutory requirements.
- 2.7 It is a requirement that my report must give reasons for each of its recommendations and contain a summary of its main findings. I have only recommended modifications to the Neighbourhood Plan (presented in bold type) where I consider they need to be made so that the plan meets the Basic Conditions and the other requirements.

The Examination Process

- 2.8 The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or so that a person has a fair chance to put a case.

- 2.9 I have sought clarification on a number of factual matters from the Qualifying Body and/or the local planning authority in writing. I am satisfied that the responses received have enabled me to come to a conclusion on these matters without the need for a hearing.
- 2.10 I had before me background evidence to the plan which has assisted me in understanding the background to the matters raised in the Neighbourhood Plan. I have considered the documents set out in Section 5 of this report in addition to the Submission draft of the HCR&SNP 2019 – 2030.
- 2.11 I have considered the Basic Conditions Statement and the Consultation Statement as well as the screening statement for the Strategic Environmental Assessment and Habitats Regulation Assessment and the Sustainability Assessment. In my assessment of each policy I have commented on how the policy has had regard to national policies and advice and whether the policy is in general conformity with relevant strategic policies, as appropriate.
- 2.12 In view of the restrictions on travel due to Covid-19, I have not undertaken a site visit to the Plan area.

Legislative Requirements

- 2.13 The neighbourhood plan making process has been led by Haworth, Cross Roads & Stanbury Parish Council which is a “qualifying body” under the Neighbourhood Planning legislation which entitles them to lead the plan making process.
- 2.14 The Neighbourhood Plan area is co-terminus with the parish of Haworth, Cross Roads & Stanbury. The area was designated by the City of Bradford Metropolitan District Council on 5 November 2013 as a Neighbourhood Area. The Qualifying Body has confirmed that there are no other neighbourhood plans relating to that area.
- 2.15 A neighbourhood plan must specify the period during which it is to have effect. The front cover of the Neighbourhood Plan and text within the Plan show the date 2019 - 2030.
- 2.16 The Plan does not include provision for any excluded development: county matters (mineral extraction and waste development), nationally significant infrastructure or any matters set out in Section 61K of the Town and Country Planning Act 1990.
- 2.17 The Neighbourhood Development Plan should only contain policies relating to the development and use of land. The HCR&SNP policies are compliant with this requirement.
- 2.18 The Plan includes Community Actions and Approaches which are summarised on pages 61 – 62 of the Plan. These are clearly indicated as

complementary actions and aspirations to be delivered by the community through other organisations and agencies. This section should make it clear that they do not form part of the statutory development plan.

- 2.19 The Basic Conditions Statement confirms all the above points and I am satisfied therefore that the HCR&SNP satisfies all the legal requirements set out in paragraph 2.4 above.

Recommendation: 1

Add the following on page 13, 7th paragraph under Chapter 5: The Plan Policies and Community Actions: “*It should be noted that the Community Actions and Approaches do not form part of the statutory Development Plan.*”

Add the following on page 61 under the first paragraph - Chapter 5 of this plan: “*It should be noted that the Community Actions and Approaches do not form part of the statutory Development Plan.*”

The Basic Conditions

Basic Condition 1 – Has regard to National Policy

- 2.20 The first Basic Condition is for the neighbourhood plan “*to have regard to national policies and advice contained in guidance issued by the Secretary of State*”. The requirement to determine whether it is appropriate that the plan is made includes the words “*having regard to*”. This is not the same as compliance, nor is it the same as part of the test of soundness provided for in respect of examinations of Local Plans which requires plans to be “*consistent with national policy*”.
- 2.21 The Planning Practice Guidance assists in understanding “appropriate”. In answer to the question “What does having regard to national policy mean?” the Guidance states a neighbourhood plan “*must not constrain the delivery of important national policy objectives.*”
- 2.22 In considering the policies contained in the Plan, I have been mindful of the guidance in the Planning Practice Guide (PPG) that:

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like.”
- 2.23 The NPPF of February 2019 (as amended) is referred to in this examination in accordance with paragraph 214 of Appendix 1, as the plan was submitted to the Council after 24 January 2019.

- 2.24 The Planning Practice Guidance on Neighbourhood Plans states that neighbourhood plans should “*support the strategic policies set out in the Local Plan or spatial development strategy and should shape and direct development that is outside of those strategic policies*” and further states that “*A neighbourhood plan should, however, contain policies for the development and use of land. This is because, if successful at examination and referendum, the neighbourhood plan becomes part of the statutory development plan.*”
- 2.25 Table 1 of the Basic Conditions Statement includes comments on how the policies of the HCR&SNP have had regard to national policy and guidance. The paragraph numbers of the NPPF of July 2018 and NPPG of October 2018 are referred to in this table. I consider the extent to which the plan meets this Basic Condition No 1 in Section 3 below.

Basic Condition 2 - Contributes to sustainable development

- 2.26 A qualifying body must demonstrate how a neighbourhood plan contributes to the achievement of sustainable development. The NPPF as a whole constitutes the Government’s view of what sustainable development means in practice for planning. The NPPF explains that there are three dimensions to sustainable development: economic, social and environmental.
- 2.27 Section 5 of the Basic Conditions Statement includes the summary table from the Sustainability Assessment and highlights how the HCR&SNP has sought to deliver the three arms of sustainable development and the potential impacts of each policy.
- 2.28 I am satisfied that the Plan contributes to the delivery of sustainable development and therefore meets this Basic Condition.

Basic Condition 3 – is in general conformity with strategic policies in the development plan

- 2.29 The third Basic Condition is for the neighbourhood plan to be in general conformity with the strategic policies contained in the Development Plan for the area. The Development Plan relevant to the area comprises the Bradford Core Strategy (CS) adopted in 2017 and the saved policies of the Replacement Unitary Development Plan (RUDP), originally adopted in 2005.
- 2.30 A partial review of the Core Strategy is underway. Work reached the Preferred Options stage in July 2019. Further consultation (a revised Preferred Options) is due to take place in 2020, with a submission draft programmed for 2021. The Allocations DPD is at an early stage of preparation: the Issues and Options paper was consulted on in 2016 and the Preferred Options is currently being prepared.
- 2.31 Table 3 of the Basic Conditions Statement assesses the HCR&SNP policies against the relevant policies of the Core Strategy and the saved policies of the RUDP, where applicable.

- 2.32 I consider in further detail in Section 3 below the matter of general conformity of the Neighbourhood Plan policies with the strategic policies.

Basic Condition 4 – Compatible with EU obligations and human rights requirements

- 2.33 A neighbourhood plan must be compatible with European Union obligations as incorporated into UK law, in order to be legally compliant. Key directives relate to the Strategic Environmental Assessment Directive and the Habitats and Wild Birds Directives. A neighbourhood plan should also take account of the requirements to consider human rights.
- 2.34 Regulation 15 of the Neighbourhood Planning Regulations as amended in 2015 requires either that a Strategic Environmental Assessment is submitted with a Neighbourhood Plan proposal or a determination from the responsible authority (The City of Bradford Metropolitan District Council) that the plan is not likely to have “significant effects.”
- 2.35 A screening opinion was carried out by the CBMDC on the draft HCR&SNP in July 2018. The results of this are contained in a document entitled ‘Haworth, Cross Roads & Stanbury Neighbourhood Plan Strategic Environmental Assessment & Habitat Regulations Assessment Screening Report’.
- 2.36 The Screening Report concluded in paragraph 4.1 that ‘SEA is not required’. The reason for this conclusion was as follows:

“The assessment in tables 3.1 and 3.2 indicates a range of possible minor positive and negative environmental effects as a result of the draft plan policies. No likely significant environmental effects have been identified.”

However, paragraph 4.2 stated that *“This is a preliminary view reached prior to consulting Natural England, the Environment Agency and Historic England.”*

- 2.37 Consultation was carried out with the statutory environmental bodies on the SEA Screening Report in July 2018. Natural England, the Environment Agency and Historic England all confirmed that they considered that from the information supplied, the HCR&S NP was unlikely to have significant environmental effects.
- 2.38 The HRA Screening Assessment assesses the likely significant effects of the Plan’s policies on four SPA/SAC sites and concluded in paragraph 7.1 that:

“The assessment undertaken in section 6 of this report concludes the draft NP is not likely to have a significant effect on a European site either alone or in combination with other plans or projects. This is a preliminary view reached prior to consulting Natural England.”

The 2018 report took account of the European Union Court of Justice Judgement in ‘People over Wind’ dated 12 April 2018.

- 2.39 In response to the consultation on the HRA Screening Assessment in July 2018, Natural England confirmed that they welcomed the assessment and stated that provided the Plan cannot be interpreted to be promoting allocations that have not been adopted in a higher level plan, they concurred with the conclusions of no significant effects. .
- 2.40 An update to the HRA screening was published in May 2019 following changes to habitats regulations through The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 which came into force on 28 December 2018. The re-screening considers whether the Plan meets the Basic Conditions or breaches the requirements of Chapter 8 of Part 6 of the above Regulations.
- 2.41 The report reviewed the impact of the Plan on the South Pennine Moors SPA/SAC. It concluded in paragraph 4.1 that *“none of the policies in the Haworth, Cross Roads and Stanbury NP are likely to have a significant effect on the South Pennine Moors SPA/SAC, and therefore the NP does not give rise to, or include, any mitigation measures. Bearing in mind the conclusions of the HRA of the Bradford Core Strategy, it is concluded that there are no likely significant effects in combination with other plans or projects.”*
- 2.42 Paragraph 4.2 adds that *“The Council has considered the Bradford HRA Assessment and the contents of the NP and it is satisfied that measures intended to avoid or reduce the harmful effects of the plan have not been relied on in order to screen out the neighbourhood plan under the Conservation of Habitats and Species Regulations 2017 and that the draft plan meets the revised Basic Condition.”*
- 2.43 No further consultations were carried out with Natural England on the May 2019 update report. No concerns were raised about the HRA in their response to the Regulation 16 consultation.
- 2.44 I am satisfied that the SEA and HRA screening opinions have been carried out in accordance with the legal requirements.
- 2.45 The Basic Conditions Statement does not consider the impact of the Plan on Human Rights. I have asked the Qualifying Body to provide me with an assessment. They have stated that:
- “The Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act. In preparing the plan, the parish council has consistently taken steps to ensure that the views of all sections of the community including hard to reach groups have been canvassed and taken into account. This approach to consultation is summarised in Chapter 3 of the plan itself and fully detailed in the Consultation Statement.”*
- 2.46 From my review of the Consultation Statement, I have concluded that the HCR&SNP has had appropriate regard to Human Rights.

2.47 I am not aware of any other European Directives which apply to this particular Neighbourhood Plan and no representations at pre or post-submission stage have drawn any others to my attention. Taking all of the above into account, I am satisfied that the HCR&SNP is compatible with EU obligations and therefore with Basic Conditions Nos 4 and 5.

Consultation on the Neighbourhood Plan

2.48 I am required under The Localism Act 2011 to check the consultation process that has led to the production of the Plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.

2.49 The key stages of consultation on the preparation of HCR&SNP were:

- Spring 2014 - an initial newsletter was sent to all homes alongside other publicity, leading to village consultation meetings and face-to-face/written engagement with a range of stakeholders.
- September 2015 – consultation was undertaken with the community, stakeholders and CBMDC on a 'Policy Intentions Document', including 3 supporting community drop-in events;
- February/March 2018 – informal sites consultation with landowners and the wider community, including 3 community drop-in events;
- October-December 2018 – statutory Regulation 14 consultation on the Pre- Submission Neighbourhood Plan, including 3 community drop-in events.

2.50 Consultation meetings were held in all three village centres so that every part of the community had an opportunity to be involved in the process. Banners, posters, press releases, social media and a specially designed website were the tools used to provide maximum exposure for the project. The parish council's newsletter that is delivered to every household in the parish also carried information and requests for information.

2.51 Approaches were also made to businesses, developers, landowners, environmental groups, heritage groups, churches/chapels, school heads and pupils and senior citizens. Feedback was received from 16 business representatives and 3 school heads.

2.52 The Policy Intentions Document was consulted on in spring 2015. It set out what the parish council was minded to include in the draft neighbourhood plan. The document was circulated with a questionnaire (which was also available on Survey Monkey) to all households, local businesses and CBMDC. Three supporting drop-in events were also held attended by 49 people. The questionnaire was completed by 286 respondent households.

2.53 Following a period of evidence gathering the first draft of the plan emerged in late 2017. This plan contained a number of policies and proposals relating to individual sites and buildings within the Neighbourhood Area. It was

considered necessary to carry out a targeted informal consultation with those with legal interests in these sites/buildings, as well as giving local people the opportunity to comment on these detailed proposals. The draft was also submitted at this stage to CBMDC for informal comment.

- 2.54 The Informal Sites Consultation ran from 19 February - 12 March 2018. Those with identified legal interests were consulted by e-mail, post or hand-delivered correspondence. Three 'drop-in' consultation events were held in the three villages from 6 – 8 March. These were attended by 17 people. The consultation attracted responses from 35 separate sources, together covering 40 of the 125 consultation sites and additionally putting forward 6 further sites for consideration.
- 2.55 The Pre-Submission consultation on the draft HCR&SNP took place for 6 weeks between 26 October and 7 December 2018 in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 and the Localism Act 2011. The Consultation Statement sets out details of the organisations consulted and the responses received. All households and businesses in the parish received notification of the consultation. A display of information was also made available. Forty four responses were received during the consultation period. They have been recorded in Appendix 11 of the Consultation Statement, together with the Qualifying Body's responses and consequential amendments to the Plan.
- 2.56 The Regulation 16 consultation on the Submission draft Plan was carried out by the CBMDC between 17 September and 29 October 2020. Ten responses were received.
- 2.57 Section 6 of the Consultation Statement reflects on the consultation process and identifies that more effort could have been given to garnering the views of the young, old and disabled. The section acknowledges that the interests of younger people are clearly identified under 'community actions' in the 'Community Facilities and Services' section of the Neighbourhood Plan and in Policy CF2 – Provision of New Community Facilities. Both the older population and disabled interests were felt to be already well-catered for and their facilities clearly protected through the provisions of Policy CF1.
- 2.58 It is clear from the evidence presented to me in the Consultation Statement, that extensive consultation has been carried out during the preparation of the HCR&SNP.
- 2.59 I am satisfied that the pre-submission consultation and publicity has met the requirements of Regulations 14, 15 and 16 in the Neighbourhood Planning (General) Regulations 2012.
- 2.60 This report is the outcome of my examination of the Submission Draft Version of the HCR&SNP. I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions. My report makes recommendations based on my findings on whether the Plan

meets the Basic Conditions and provided the Plan is modified as recommended, I am satisfied that it is appropriate for the Neighbourhood Plan to be made. If the plan receives the support of over 50% of those voting then the Plan will be made following approval by the City of Bradford Metropolitan District Council.

3.0 Neighbourhood Plan – As a whole

- 3.1 The Neighbourhood Plan is considered against the Basic Conditions in this section of the Report following the structure and headings in the Plan. Given the findings in Section 2 above that the plan as a whole is compliant with Basic Conditions No 4 (EU obligations) and other prescribed conditions, this section largely focuses on Basic Conditions No 1 (Having regard to National Policy), No 2 (Contributing to the achievement of Sustainable Development) and No 3 (General conformity with strategic policies of the Development Plan).
- 3.2 Where modifications are recommended, they are presented and clearly marked as such and highlighted in bold print, with any proposed new wording in italics.
- 3.3 Basic Condition 1 requires that the examiner considers whether the plan as a whole has had regard to national policies and advice contained in guidance issued by the Secretary of State. Before considering the policies individually, I have considered whether the plan as a whole has had regard to national planning policies and supports the delivery of sustainable development.
- 3.4 The PPG states that “*a policy should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area*”. I will consider this requirement as I examine each policy.
- 3.5 The community is to be congratulated on the amount and quality of the work that they have undertaken in identifying and assessing the local heritage assets. My recommendations are made to ensure that the relevant policies and evidence are clearly presented so that they can be applied consistently by decision makers.
- 3.6 The Plan is on the whole clearly presented with policies addressing the built heritage, green environment, community facilities housing, employment, tourism and highways and travel. The policies are clearly distinguishable from the supporting text by surrounding coloured boxes. I make a number of recommendations to improve the clarity of the wording of the policies and their justifications.

- 3.7 The Plan contains 5 Maps and a Policies Map. There are maps of views in the conservation areas in Appendix 1. The viewpoints on the Stanbury map are unnumbered. They should be numbered to correspond to the subsequent photographs.
- 3.8 The non designated heritage assets and community facilities are shown on the Policies Map with coloured circles. Decision makers will find it difficult to determine the precise location of the properties and their site boundaries from this map. Location maps showing the boundaries of the properties should be included in a new background evidence report on non designated heritage assets (expanded from Appendix 3) and Appendix 7 to show the boundary of the properties identified.
- 3.9 The key to the Policies Map includes a heading “Non Neighbourhood Plan Designations” and lists the policies addressing the conservation areas, the potential housing sites and public car parks. These relate to area specific policies in the plan and it is suggested that the map would be clearer by deleting this heading and including the policy locations under topic headings of Built Heritage, Housing and Highways and Travel as appropriate.
- 3.10 The shading colour on the key to the Policies Map for the South Pennines SPA/SAC should be adjusted to match that on the map.
- 3.11 The Plan includes eleven Appendices which contain a considerable amount of information usually contained in background evidence reports to support the designations in the plan. I have recommended under recommendation 8 that Appendix 3 should be expanded and presented as a separate evidence report. When the plan is finalised, the Qualifying Body may wish to consider whether to place the evidence contained in the other Appendices in separate background evidence reports in order to ensure that the HR&SNP is focused on the policies. The maps of views from Appendix 1 should be included within the Plan.
- 3.12 It is suggested that criteria in policies and paragraphs in the justification should be numbered for ease of reference by plan users. Ensure punctuation of criteria is correct by placing the word “and” at the end of the penultimate criterion where all criteria are to be applied

Recommendation 2: Improve the mapping of the Plan by:

Number the viewpoints on the Stanbury map in Appendix 1 of the Plan to correspond to the subsequent photographs. Place the maps of views within the text of the Plan itself.

Ensure that the Non-Designated Heritage Assets are shown in numeric order within each category in the key to the Policies Map and the assessment report. (See Recommendation 8)

Delete the heading “Non Neighbourhood Plan Designations” from the key to the Policies Map. Place the notation under topic headings of Built Heritage, Housing and Highways and Travel.

Ensure the colouring in the key for the South Pennines SPA/SAC is consistent with that on the map.

Prepare a background evidence report for the Non Designated Heritage Assets to include the assessment details currently in Appendix 3 and include site location maps showing the boundaries of the properties designated and buildings referred to.

The Neighbourhood Plan

Introduction - Strategic Context

- 3.13 The introductory sections of the Plan set out a concise introduction to the plan area and the process of plan preparation. However, in view of the decision not to allocate housing sites in the Plan, but to set out matters to be taken into account should any of the four potential sites be selected for allocation in the emerging Bradford Site Allocations Plan, it would be helpful to plan users to set out the context for this by including a paragraph about the strategic framework and timescales for progress. CBMDC has supplied the text included in the recommendation.

Recommendation 3: Include a new section in the Introductory section of the Plan to explain the Strategic Planning Context for the Plan and the timescales for preparing the emerging Core Strategy Partial Review and Allocations DPD. Explain the status of the villages in the settlement hierarchy and the level of growth anticipated in the strategic plan to provide the context for the housing and employment policies in the HCR&SNP. Explain how it is intended that the requirements set out in Policies H1 – H4 are to be taken forward.:

“The adopted local plan for the area comprises

- *“the Bradford Core Strategy (CS) adopted in 2017 which sets out the broad scale and distribution of growth as well as policies to protect and enhance the natural and built environment, and guide/manage development across Bradford district for the period 2011 to 2030; and*
- *“the saved policies of the Replacement Unitary Development Plan (RUDP), adopted in 2005 which includes a number of policies that are relevant to the neighbourhood plan, including the defined Green Belt boundaries.*

“CBMDC is currently undertaking a partial review of its Core Strategy. This review is due to various changes to national planning policy and

local circumstances, and covers several subjects including a proposed new plan period (2020 to 2037), revised housing and employment land requirements and spatial distribution as well as various environment and transport policies. Work reached the Preferred Options stage in July 2019. Further consultation (a revised Preferred Options) is due to take place in 2020, with a submission draft being published in 2021.

“Work is also on-going to prepare an Allocations DPD that will identify sites to meet the requirements of the Core Strategy Partial Review. The Allocations DPD is at an early stage of preparation: the Issues and Options paper was consulted on in 2016 and the Preferred Options is currently being prepared.”

“Strategic Planning Context for the Neighbourhood Plan - Level of Growth & Development

“For spatial planning purposes, CBMDC has split its area into four sub-areas (City of Bradford; Airedale; South Pennine Towns & Villages; and Wharfedale). The neighbourhood plan area is situated within the South Pennine Towns & Villages sub-area.

“The settlement hierarchy is defined in Core Strategy Policy SC4. Under this policy, Haworth is classed as a Local Service Centre, where the emphasis will be 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. Cross Roads is not specifically referred to as a separate settlement within the hierarchy. Figure SS2 within the Core Strategy shows the extent of Haworth and Cross Roads.

“Stanbury is classed under saved RUPD policy K/GB3.5 as being washed over by the Green Belt. It is not specifically referred to in the Core Strategy settlement hierarchy.

“Under Core Strategy Policies PN1 and HO3, Haworth will see the development of 400 homes over the adopted plan period (2011 to 2030). Within the Core Strategy Partial Review, it is proposed to reduce this requirement to 275 dwellings over the revised plan period (2020 to 2037). The sites to accommodate this growth will be identified in the emerging Allocations DPD. A specific level of employment development is not identified for the neighbourhood plan area.

“In terms of the retail hierarchy (Core Strategy Policy EC5), Main Street and Mill Hey in Haworth, and Cross Roads are identified as Local Centres. The policy states that these centres should be the focus for appropriately sized local supermarkets and a variety of small shops of a local nature to meet people’s day to day needs and minimise their need to travel.

“Development in Stanbury is restricted by saved RUDP Policy GB3 to infill development, provided that it falls within the infill boundary of the settlement, as defined on the Proposal Map, fills a small gap in a small group of buildings and is related to the scale of the settlement and does not adversely affect the character of the settlement or its surroundings. Also it should not result in the loss of open space which is important to the character, visual amenity and local identity of the settlement. Proposals for the extension of the settlement will not be permitted.

“Implementation of Policies H1 to H4

“The policies, as drafted, leave any formal designation/allocation of these sites to the Local Plan Allocations DPD which CBMDC is in the process of preparing. Work is underway on assessing the suitability of all sites within the Strategic Housing Land Availability Assessment (SHLAA), including those listed in Policies H1 to H4 of the Haworth, Cross Roads & Stanbury Neighbourhood Plan, using an agreed site selection methodology. The results of this work, together with the evidence base, Sustainability Appraisal and Habitat Regulations Assessment will inform which sites are identified in the Preferred Options version of the Allocations DPD, due for publication later in 2020.

“Should all or any of these sites be allocated in the Allocations DPD, it would be expected that the policy considerations set out in the neighbourhood plan Policies H1 to H4 will be used in determining planning applications on them.

“It should be noted the Ebor Mills site (Policy H4) is the subject of a pending planning application (Application Ref: 19/04426/MAF). It is for the conversion and refurbishment of Ebor Mills into 14 dwellings, construction of 24 new dwellings within the curtilage of the site, landscaping, biodiversity and environmental enhancements, highway and footway improvements to Ebor Lane and demolition of the weaving sheds and partial demolition and reconstruction of the boiler house. An application for Listed Building Consent (Application Ref: 19/04425/LBC) is also pending.”

Vision and Aims

- 3.14 The Vision and Aims have been developed and tested through community consultation. There are ten aims which are linked to relevant policies in the introductions to each section of the Plan.

The Policies

Policy BHDD1: Haworth Conservation Area – Development and Design

- 3.15 The policy sets out 12 design principles to seek to ensure that development in the Haworth Conservation Area reflects the distinctive local characteristics of the conservation area. The policy seeks to build on Core Strategy Policy EN3 which sets out the principles for conserving the historic environment and Policy DS3 which sets out design principles to encourage a strong sense of place in new development.
- 3.16 The justification to the policy refers to the Haworth Conservation Area Appraisal (HCAA) which was approved in 2007 and notes that it is out of date and a review of this document is overdue. Unless there are matters in the CAA that are inaccurate or incorrect, it is considered that this is not helpful to understanding the application of the policy and it is recommended that the sentence is deleted and a statement included noting that a review is due. It is noted that the views and vistas referred to in bullet point two are those identified in the HCAA. There is a Community Action to seek a review of the HCAA.
- 3.17 The second paragraph on page 17 refers to the conservation area designation setting “a standard of development in the area”. It is considered that this is not a correct interpretation of the purpose for designating a conservation area that it is “*an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance*”. NPPF paragraph 185 states that “*Plans should set out a positive strategy for the conservation and enjoyment of the historic environment.*” A revision to the wording of this paragraph is recommended.
- 3.18 The first paragraph of the policy refers to the bullet points in the policy as “objectives”, however the points are worded as design principles. I am recommending the replacement of the word “objectives” with “design principles”. Other minor revisions are recommended to improve the clarity of the wording of the policy.
- 3.19 A representation has been received concerning bullet point two that “*development must maintain and respect the significant views and vistas, into, out of and through the conservation area*”. Appendix 1 shows 54 views in Haworth and 26 in Stanbury which have been derived from the Conservation Area Appraisals. Photographs and brief descriptions of the views are included in the Appendix. Most of the views are along the streets in the conservation areas or of particular buildings or locations. No attempt has been made to identify the “significant” views, that is those that are particularly outstanding or to explain why these views are important. In the circumstances, I am recommending that the views should not be described as significant and that the principle should be revised to ask developers to show the impact that their proposals would have on any identified views.

- 3.20 Bullet point 4 refers to the use of materials that “reflect the interest of the area”. I have asked the Qualifying Body to explain their intentions with this wording and how it should be interpreted by users of the Plan. They have explained that it is the “architectural and/or historic interest” of the area. To improve the clarity of the wording of the policy I have recommended the inclusion of the additional wording.
- 3.21 Bullet points 2, 3, 10, 11 and 12 are set out as requirements, whereas the other points include some flexibility. It is recommended that those points that are worded as requirements are reviewed and a degree of flexibility is introduced, where appropriate.
- 3.22 Bullet points 9 and 10 set out brief guidance on shopfronts. It would be helpful to plan users to made reference to the Council’s Shop Front Design Guide and the Shopkeepers Guide to Securing the Premises SPDs which provide more detailed guidance on the design and retention of shop fronts in historic areas. The reinstatement of original features may not be possible if they have been lost and revision to the wording of point 9 is recommended.
- 3.23 The penultimate paragraph of the policy on modern architectural design is poorly worded and a revision is recommended.

Recommendation 4: Revise Policy BHDD1 as follows:

Revise the first paragraph of the policy to read: “..... Policies Map, *development including*local characteristics and *have regard to the following design principles:*”.

Revise the second bullet point to read: “*The need to maintain and respect the views and vistas into, out of, and through the conservation area shown on the maps in Appendix 1 and demonstrate the impact of their proposal on any views.*”

Revise bullet point 3 to read: “Reflect, *where possible*,”

Revise bullet point 4 to read: “...that reflect the *architectural and/or historic* interest of the area.....”

Revise bullet point 9 to read: “....the reinstatement of traditional features *of a similar design to the original* should be.....”

Revise bullet point 10 to read: “*Retain* traditional shopfronts; any new or replacement shopfronts *reflecting*.....”

Revise bullet point 11 to read: “*Retain* important trees.....”

Revise bullet point 12 to read: “*Retain* key open spaces.....”

Revise the penultimate paragraph of the policy to read: “....respects the distinctiveness of the conservation area.”

Replace the fourth sentence from the first paragraph on page 17: “This appraisal however is now out of date.....development” with “A review of this appraisal is due.”

Revise the second paragraph on page 17 to read: “*The designation of the conservation area recognises its historic and architectural importance. New development proposals within or adjacent to it should be designed to be sympathetic to the area’s special character and avoid the destruction of....*”

Add a new paragraph in the justification: “*The City of Bradford MDC Shop Front Design Guide and the Shopkeepers Guide to Securing the Premises SPDs set out detailed guidance on the design of shopfronts in historic areas.*”

Policy BHDD2: Stanbury Conservation Area – Development and Design

- 3.24 The policy sets out development and design principles to be applied to the Stanbury Conservation Area. However, the policy has identical wording to Policy BHDD1. In the circumstances it is recommended that the policies are amalgamated and retitled. The supporting text should be retained for each area.

Recommendation 5: Delete Policy BHDD2

Retitle Policy BHDD1 as “Haworth and Stanbury Conservation Areas – Development and Design”.

Replace the fourth sentence of the second paragraph on page 21: “As with Haworth, this appraisal is now out of date.....development.” with “A review of this appraisal is due.”

Correct the typographical error in the 6th bullet point on page 21 to “dependent”.

Amalgamate the duplicated text on pages 17 and 21.

Policy BHDD3: Local Heritage Areas

- 3.25 The policy identifies four areas as Local Heritage Areas. The justification to the policy explains that the purpose of the policy is to provide interim guidance on development and design in the areas whilst the Parish Council pursues their designation as conservation areas by CBMDC. Appendix 2 sets out the community’s assessment of the areas taking account of guidance from Historic England. I make no comment on the suitability or otherwise of

these areas as candidate conservation areas; this will be a matter for the CBMDC to determine.

- 3.26 Historic England’s guidance advises that local communities working on neighbourhood plans may consider identifying areas which have special interest and character or appearance possibly meriting consideration for designation by the local planning authority.
- 3.27 NPPF paragraph 185 states that “*Plans should set out a positive strategy for the conservation and enjoyment of the historic environment.*” Historic England’s guidance suggests that a ‘positive strategy’ could include specific, more detailed, policies for individual conservation areas, possibly alongside design policies. These non strategic policies can also be included in neighbourhood plans.
- 3.28 NPPF paragraph 200 states that “*Local planning authorities should look for opportunities for new development within Conservation Areasand within the setting of heritage assets, to enhance or better reveal their significance.*”

“*Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably*”.
- 3.29 In addition to the designation of the four areas, Policy BHDD3 states that the sympathetic enhancement of the areas will be encouraged. In order to reflect national guidance on the historic environment, it is recommended that the policy should also refer to their “conservation” and “to better reveal their significance”.
- 3.30 Policies BHDD4 – 7 set out design policies for each of the four local heritage areas. It would be helpful to plan users to add reference in Policy BHDD3 to the design principles set out in the subsequent policies as revised.

Recommendation 6: Revise Policy BHDD3 as follows:

Revise the final line of the policy to read: “The *conservation* and *sympathetic enhancement* of these areas *to better reveal their significance* will be encouraged *in accordance with the design principles set out in Policy BHDDX.*”

Policy BHDD4: Haworth Brow Local Heritage Area

Policy BHDD5: Haworth Coldshaw Local Heritage Area

Policy BHDD6: Cross Roads Centre Local Heritage Area

Policy BHDD7: Murgatroyd Local Heritage Area

- 3.31 These policies set out the design principles that will be applied to the consideration of development proposals in the local heritage areas. All four

policies contain the same principles with some additional ones that are area specific. To reduce the amount of repetition in the plan it is recommended that the policies should be amalgamated setting out the general principles that are applicable to all areas and those which are area specific.

Recommendation 7: Amalgamate Policies BHDD4 – BHDD7 and entitle the new policy Local Heritage Areas – Development and Design.

Policy BHDD8: Protection and Enhancement of Non-Designated Heritage Assets

- 3.32 The policy proposes the designation of 68 properties as Non Designated Heritage Assets. The justification to the policy states that they have been assessed in accordance with Historic England’s Local Heritage Listing Guidance by the Steering Group and a summary of the features of interest and significance as well as the reasons for designation is included in Appendix 3 of the Plan. These properties are in addition to the “key unlisted buildings” that have been identified in the Conservation Area Appraisals.
- 3.33 NPPF paragraph 197 states that *“the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*
- 3.34 The PPG on Historic Environment (040 Reference ID: 18a-040-20190723) states that neighbourhood plans may identify non-designated heritage assets. It goes on to say that *“it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence. Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers. This includes information on the criteria used to select non-designated heritage assets and information about the location of existing assets. It is important that all non-designated heritage assets are clearly identified as such.”*
- 3.35 Policy EN3 (F) of the Core Strategy requires proposals to protect or enhance the heritage significance and setting of locally identified non designated heritage assets.
- 3.36 The properties are shown on the Policies Map by coloured dots and it is difficult to identify the precise location of each property and its curtilage. To ensure that the policy can be applied consistently by decision makers it is recommended that a more detailed assessment report is prepared by expanding Appendix 3 to include full details of the process of identifying and assessing the properties: how the properties were identified, the criteria used

for assessment, plans showing the location of the property and its curtilage. Photographs would also be helpful. The properties that are not to be designated should be removed from the report.

- 3.37 The Qualifying Body has confirmed that this is acceptable to them. Most of the owners and occupiers were consulted on the proposed designation at the Regulation 14 stage. As ownerships may have changed since then, it would be helpful to notify them all of the proposed designation.
- 3.38 CBMDC has confirmed that they do not have a process in place for identifying or designating non designated heritage assets.
- 3.39 CBMDC has commented that land at Ebor Mills has been designated as a Local Wildlife Site and this should be recognised in the assessment. I agree that this would be helpful.
- 3.40 I am making recommendations to modify the wording of the policy to better reflect the national guidance and to improve the assessment report to include the assessment criteria and clear details of the location of each property to ensure that the assessment report presents sound evidence.
- 3.41 I make no comments on whether or not the properties are worthy of designation as non-designated heritage assets.
- 3.42 The final paragraph of Policy BHDD8 states that the “sympathetic enhancement will be encouraged”. It is recommended that the policy should also refer to the “conservation” of the property to better reflect national and strategic policy and that the paragraph should be included in the opening paragraph of the policy.

Recommendation 8: Revise Policy BHDD8 as follows:

Revise the first paragraph and amalgamate with the last paragraph of the policy to read “.....Policies Map and described in the Non Designated Heritage Asset Assessment Report, will be taken.....such an asset. A balanced judgement will be made having regard to the scale of any harm or loss caused by any development and the asset's significance. Their conservation and sympathetic enhancement will be supported.”

Prepare a more detailed assessment report of the non-designated heritage assets including the assessment contained in Appendix 3 and include full details of the process of identifying and the criteria for assessing the properties, plans showing the location of each property and its curtilage. Photographs would also be helpful.

Revise the assessment on the former Mill pond at Ebor Mills to refer to the Local Wildlife Site designation.

Policy GE1: Green Infrastructure

- 3.43 The policy identifies the area and boundaries of four areas already identified in strategic assessments as green infrastructure. Core Strategy Policy SC6 sets out the principles for the selection of district level Green Infrastructure and notes that further work is required to identify the boundaries of areas.
- 3.44 Appendix 4 of the HCR&SNP sets out the considerations that have been taken into account in the assessment and defining the boundaries of the four Green Infrastructure areas.
- 3.45 The wording of the policy requirements in Policy GE1 refers to the areas being protected from development which would sever it or harm its operation as part of a multifunctional green space. It is considered that this wording is imprecise and lacks clarity about what may or may not be acceptable. It adds nothing to the strategic policies and it is recommended that these should be referred to in the policy.
- 3.46 The second paragraph of the justification on page 31 is negatively worded and a revision is recommended to improve this.
- 3.47 The third paragraph on page 31 refers to the 2009 “Yorkshire and Humber Green Infrastructure Mapping Project” which CBMDC has noted is out of date. This should be updated to reference the Bradford Ecological Habitat Network.
- 3.48 CBMDC has commented that there are some references in the plan to Bradford Wildlife Areas and that the following sites have been designated as Local Wildlife Sites.
- Brow Moor with Sugden End
 - Penistone Hill
 - Airedale Spring Mill Pond (listed in the draft plan as Local Green Space site 127)
 - Baden Street, Haworth (listed in the draft plan as Local Green Space site 126, Policy H3 and supporting text to Policy GE5).
- 3.49 I agree with the Council’s observations that this information should be updated throughout the plan, the Local Green Space Assessment and the SEA, to acknowledge the up to date terminology and the increased importance of Local Wildlife Sites over Sites of Ecological & Geological Importance and Bradford Wildlife Areas, and the citation documents appended.
- 3.50 The final sentence of the third paragraph under the sub-heading Landscape, Biodiversity/Geodiversity and Green Infrastructure should be amended to refer to the Local Wildlife Sites and they should be shown as such on the Policies Map.

Recommendation 9: Revise Policy GE1 as follows:

Add the following to the end of the final paragraph of the policy: “...in accordance with the Core Strategy policies.”

Revise the final sentence of the third paragraph under the sub-heading Landscape, Biodiversity/Geodiversity and Green Infrastructure (page 30) to read: “Further designated sites of regional or local interest include *the four Local Wildlife Sites (LWS) of Airedale Spring Mill Pond, Baden Street (Haworth), Brow Moor with Sugden End, and Penistone Hill. The last of these is also a Country Park*”. These sites should be identified on the Policies Map.

Revise the second paragraph of the justification on page 31 to read: “*The Core Strategy sets out a comprehensive suite of policies on national and strategic green infrastructure. The neighbourhood plan can build on this by.....*”

Update the third paragraph on page 31 to refer to the Bradford Ecological Habitat Network and the sites identified.

Update the Plan, SEA and background documents to refer to the four following sites as Local Wildlife Sites and to consider and acknowledge the potential conflicts that may occur with other designations and possible proposals on the sites.

- **Brow Moor with Sugden End**
- **Penistone Hill**
- **Airedale Spring Mill Pond**
- **Baden Street, Haworth.**

Policy GE2: Local Green Space

- 3.51 The policy proposes the designation of 23 sites as Local Green Spaces. The assessment of the sites is contained in Appendix 5 of the Plan.
- 3.52 CBMDC has commented that a number of the sites are protected under other designations. The NPPG advises that where land is already protected by Green Belt policy, (or other designation) then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.
- 3.53 NPPF paragraph 101 states that “*Policies for managing development within a Local Green Space should be consistent with those for Green Belts*”. It is considered that there is no planning policy benefit in designating sites in the Green Belt as LGS. However, there may be value to the community of a comprehensive assessment of all the sites that are important to the

community for their recreational value or landscape importance. The LPA has confirmed that the following sites are within the Green Belt:

- LGS 2: Haworth Cricket Pitch (also identified under saved RUDP policy OS3 as a playing field)
- LGS 3: Mytholmes Recreation Ground
- LGS 4: Longacres Park (Massey Fields Play Area)
- LGS 8: Stanbury Playground
- LGS 13: Stanbury Cemetery
- LGS 126: Baden Street Woodland (also designated as Local Wildlife Site)
- LGS 139: West Lane Methodist Chapel Burial Ground
- LGS 160: Brow Top Road.

- 3.54 Sites may also be identified for their nature conservation or historic value, whereas the designation of a site as a LGS recognises the importance of the sites to the local community. I am satisfied that the sites proposed satisfy the criteria for designation as LGS in NPPF paragraph 100.
- 3.55 CBMDC has highlighted some inaccuracies in the numbering of the sites in Policy GE2, Appendix 5 and the Policies Map at West Lane Methodist Chapel Burial Grounds and West Lane Baptist Church Burial Grounds.
- 3.56 CBMDC has commented that site LGS160 at Brow Top Hill has been identified as a site in the SHLAA (2015). I see no conflict with this as the site was assessed as “Not currently available or unachievable” in the SHLAA and is not being taken forward. The local community has assessed the value of the site as a LGS under the NPPF guidance and I am satisfied that it meets the criteria to be designated. The proposed LGS designation should be taken into account when reviewing the SHLAA.
- 3.57 CBMDC has commented that as site LGS137 has been deleted from the Plan reference to it should be deleted from the LGS assessment for site LGS133. I agree that this should be carried out to correct the assessment for this site.
- 3.58 The NPPF confirms that “*Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.*” It is not appropriate for policies in neighbourhood plan to state whether development should or should not be permitted. Modifications are recommended to avoid the use of this phrase. Otherwise subject to this modification, I am satisfied that the policy wording accords with paragraph 101 of the NPPF.

Recommendation 10: Revise Policy GE2 as follows:

**Revise the second sentence of the first paragraph of the policy to read:
“Development on these areas will not be *supported* except in very special circumstances that justify the development.”**

Correct the numbering of the sites at West Lane Methodist Chapel Burial Grounds and West Lane Baptist Church Burial Grounds in the Policy, Appendix 5 and the Policies Map.

Delete “(NB proposed LGS 137”) from the LGS assessment for site LGS133.

Policy GE3: Local Green Space Enhancement

- 3.59 The policy encourages the enhancement of LGS where improvement is needed. CBMDC has suggested that the policy could be amalgamated with Policy GE2.
- 3.60 I consider that the wording of the policy as proposed is vague and could be misinterpreted. I have recommended a revision to the wording of the policy to improve its clarity and recommend that it be added to the end of Policy GE2 and Policy GE3 should then be deleted.

Recommendation 11: Revise the wording of Policy GE3 to read:

“The enhancement of a designated Local Green Space to improve the quality or usability of the open space will be supported.”

Amalgamate the policy with Policy GE2 by adding the above paragraph to the end of Policy GE2 and deleting Policy GE3. Amalgamate the justifications to the policies.

Policy GE4: Provision of New Green Space

- 3.61 Deficiencies in four types of open space have been identified in background studies. The policy encourages appropriate development that would help to deliver new open space to meet these deficiencies. It is not clear what types of development will be encouraged or how they will deliver open space. A recommendation is made to improve the clarity of the policy.
- 3.62 The second paragraph of the policy uses the phrase “particularly encourages”. To improve the clarity of the part of the policy it is recommended that this should be revised to “supports”.

Recommendation 12: Revise Policy GE4 as follows:

Revise the first paragraph of the policy to read: “The provision of new open space in the following categories will be *supported*.”

Revise the second paragraph of the policy to read: “.....north Haworth *will be supported*.”

Policy GE5: Land at Sugden Reservoir

- 3.63 The policy proposes new open space at Sugden Reservoir for water based biodiversity/nature conservation with associated public access, angling and car parking.
- 3.64 CBMDC has noted that the area is designated as a Local Wildlife Site and it is important to balance the policy of additional public access with the enhanced status of Local Wildlife Site.
- 3.65 The second paragraph on page 35 notes that the area is part of a candidate Local Wildlife Site. This should be updated to reflect the designation of the site. It would be helpful to plan users to emphasise the importance of balancing the additional public access with the safeguarding of the Local Wildlife Site. The third criterion of the policy requires an ecological assessment and agreement on action and therefore provides safeguards in this respect.
- 3.66 All four criteria are to be applied in considering proposals relating to this development. The word “and” should be added at the end of the penultimate criterion.

Recommendation 13: Revise Policy GE5 as follows:

Add the word “and” at the end of the penultimate criterion in Policy GE5.

Revise the last sentence of the 2nd paragraph on page 35 to read: “....Sugden End Local Wildlife Site, details of which are included in Appendix 6.”

Policy CF1: Protection and Enhancement of Community Facilities

- 3.67 The policy seeks to resist development that would result in the loss of a community facility unless it were to be replaced or it was demonstrated that there was no longer a need for the facility or it was financially unviable. The policy is negatively worded. A modification is recommended to overcome this and to create a third bullet point on financial viability.
- 3.68 It would be helpful to explain in the justification to the policy how marketing and viability assessments are to be carried out and the evidence required to support applications that involve the loss of community facilities. Further guidance could be added on local requirements and best practice on this subject if this has been published by CBMDC.
- 3.69 The facilities are shown on the Policies Map with numbered circles. Appendix 7 includes an unnumbered list of the facilities. It is recommended that the list in Appendix 7 is numbered to correspond to the Policies Map. Site locations

plans should be included in the Appendix so that the properties and their boundaries can be readily identified.

- 3.70 A representation has questioned whether pubs are community facilities as they are profit making businesses. There are 17 pubs, inns and social clubs listed in Appendix 7. I have some concerns about whether it will be feasible to safeguard all the public houses and thus whether the policy will be deliverable. However, the Qualifying Body has pointed out that the plan covers a number of settlements and each has its own facilities that are important and contribute to the social life of each community.

Recommendation 14: Revise Policy CF1 as follows:

Revise the first paragraph of the policy to read: “....Policies Map, will only be supported, where:”

Divide the second bullet point into two and create a third bullet point: “it is financially unviable.”

Revise the second paragraph of the policy to read: “The *improvement of these facilities for the benefit of Haworth, Cross Roads or Stanbury communities will be supported.*”

Add the following after the third paragraph on page 37:

“Where proposals involve the loss of a community facility, developers will be expected to demonstrate that the facility, and its continued use, is no longer economically viable, and that all reasonable efforts have been made to market the site/facility for its current use without success.”

In Appendix 7 add the numbers to the Community Facilities as shown on the Policies Map. Include site locations plans in the Appendix.

Policy CF2: Provision of New Community Facilities

- 3.71 The policy identifies the type of new community and recreational facilities that have been highlighted through consultations. The justification notes that CBMDC’s Local Infrastructure Plan recognises the need for a new multifunction community hub in Haworth.
- 3.72 The policy states that the particular facilities will be encouraged. It is recommended that this be revised to “supported” to improve the clarity of the policy.

Recommendation 15: Revise Policy CF2as follows:

Revise the first paragraph of the policy to read: “...will be *supported*, in particular:”

Policy CF3: High Speed Broadband

- 3.73 The policy supports the provision of superfast broadband. I make no comments on the policy.

Housing Sites – Development Requirements and Aspirations

- 3.74 Bradford Core Strategy Policy HO3 identifies Haworth as a Local Service Centre and sets a target of 400 dwellings to be completed in Haworth from 2011 to 2030. It is noted that there is a proposal in the Partial Review of the Core Strategy that the housing requirement should be reduced to 275 over the revised period 2020 – 2037. The Allocations DPD is in the early stages of preparation and will allocate housing sites in the area.
- 3.75 The PPG encourages neighbourhood planning bodies to plan to meet their housing requirement, and where possible to exceed it. However, neighbourhood plans are not obliged to contain policies addressing all types of development.
- 3.76 The plan makers have chosen not to allocate specific sites for housing development in the HCR&SNP. They have instead chosen to set out design and layout principles for three sites that have been safeguarded or previously identified in the RUDP which could provide for a minimum of 128 dwellings and a further brownfield opportunity site of the former mill buildings. Sites H1 to H3 are shown in the SHLAA as deliverable and developable and site H4 is shown as developable.
- 3.77 It is considered that in principle this approach accords with national planning guidance. However, paragraph 34 of the NPPF states that where plans set out the contributions expected from development, such policies should not undermine the deliverability of the plan.
- 3.78 A representation has been made that highlights potential issues of deliverability on all four sites and proposes that Policy H5 should be used in considering development on all housing sites.
- 3.79 The Qualifying Body has confirmed that they have not undertaken any masterplanning or other assessment of the potential housing sites to consider whether the requirements are deliverable and how they would impact on the viability of the sites as required by NPPF para 34.

- 3.80 The criteria under each policy are termed “requirements” however, they are in effect “design principles”. They address matters such as trees, biodiversity, heritage, flood risk, access, footpaths and specialist housing. Until further work is undertaken on the masterplanning and possible layout of the sites it will not be possible to determine whether all the criteria are deliverable or whether any would unduly affect the viability of the development of the site.
- 3.81 It is therefore recommended that some flexibility should be introduced into the wording of the policy. The criteria should be referred to as “design principles” and a sentence should be added at the end of each policy to require developers to demonstrate their reasons for non-compliance with any of the principles.
- 3.82 The Qualifying Body has confirmed that it is intended that all the criteria should be satisfied by development proposals. It is therefore recommended that the word “and” is added to the end of the penultimate criterion.

Policy H1: Worsted Road, Cross Roads

- 3.83 It is considered that criterion 4 on specialist housing is imprecise. It may be helpful to plan users to include a reference to the strategic Policy HO8 on the subject.

Policy H2: Lees Lane North, Cross Roads

- 3.84 The SHLAA refers to a Tree Preservation Order on the site which should be referred in the first criteria.

Policy H3: Baden Street, Haworth

- 3.85 The site has extensive tree cover protected by a Tree Preservation Order. The site has also been designated as a Local Wildlife Site and reference to it being a Bradford Wildlife Area should be revised. It will however be for the Allocations DPD to determine whether the development of housing on the site is compatible with the tree and wildlife designations.
- 3.86 The Plan highlights concerns with the lack of off-street parking in the adjacent housing area resulting in a narrow access road. However, the suitability of the local road network to serve any development on the site has not been assessed.
- 3.87 Criteria 6 and Policy HT4 proposes a local parking standard higher than that in the Core Strategy Policy TR2 and Appendix 4. The Council has commented that it would be helpful to refer to section 2.15 on parking in their “Homes and Neighbourhoods Design Guide 2020”. I consider that this guidance should enable developers to provide a suitable standard of parking on this site. I am not satisfied that satisfactory evidence has been provided to justify setting a local parking standard solely for this site.

Policy H4: Ebor Mills, Ebor Lane, Haworth

- 3.88 A representation has been made highlighting issues concerning the development of this site for housing: the loss of greenspace, the maintenance of the nature conservation interests on the site, flood risk and access. All these matters are addressed in the criteria of the policy and it will be for the Allocations DPD or the determination of a planning application to determine whether the development of housing on the site is compatible with the nature conservation interest and flood risk and whether a satisfactory access can be achieved.
- 3.89 The first paragraph of the policy is an explanation and not a policy requirement. It should be deleted.
- 3.90 The paragraph in the justification under Policy H4 headed “Development on Allocated Housing Sites” states that “*This Neighbourhood Plan cannot influence the outcome or vary from whatever is finally decided.*” It is considered that this statement is incorrect and should be deleted. Under national planning guidance, the plan makers did have the option to allocate housing sites in the neighbourhood plan but they have chosen not to. In addition, the Parish Council and the community have the opportunity to comment on the site options during the preparation of the Allocations DPD.

Recommendation 16: Revise Policies H1 to H4 as follows:

Revise the first paragraph of each policy to read: “..... Policies Map, should be laid out and designed in accordance with the following design principles:”

Add the word “and” to the end of the penultimate criterion in Policies H1 – H4.

Add the following at the end of each policy: “Where it is not possible to satisfy any of the design principles, developers will be required to demonstrate the reasons for non-compliance in their Design and Access Statement.”

Add the following to the fourth bullet point in Policy H1: “in accordance with the strategic policy”.

Revise the first bullet point of Policy H2 to read: “Trees that are subject to a Tree Preservation Order and other mature trees shall be safeguarded and protected during development, in accordance with Core Strategy Policy EN5.”

Revise bullet points 3 and 4 of Policy H3 to read “Bradford Local Wildlife Site”.

Revise the sixth bullet point in Policy H3 to read: “Provision of off-road parking in accordance with, or in excess of, section 2.15 of the Bradford

Homes and Neighbourhoods Design Guide 2020, Core Strategy Policy TR2 and Appendix 4.

Delete the first paragraph of Policy H4: “The site of Ebor Mills....new housing.”

**Add the following to the justification on page 42 before Policy H1:
“Developers should take account of the guidance set out in the Bradford Homes and Neighbourhoods Design Guide 2020.”**

Delete “This Neighbourhood Plan cannot influence the outcome or vary from whatever is finally decided” from the paragraph in the justification under Policy H4.

Policy H5: New Housing Development – Key Guiding Principles

- 3.91 The policy sets out the principles to be taken into account in considering all new housing development in the Plan area. The justification to the policy should make it explicit that the policy is applicable to both allocated and windfall sites.
- 3.92 The first three criteria seek “the avoidance of adverse effects”. It may not be possible to avoid all adverse effects and to improve the clarity of the policy and to ensure consistency with the NPPF, it is recommended that the wording is revised to “seek to avoid significant adverse effects” in criteria 1 and 2 and “unacceptable adverse effects” in criterion 3.
- 3.93 The second criterion on heritage assets should refer to the settings of these assets to accord with national policy.
- 3.94 A representation has been made to the fourth criterion that the timing of highway improvements will be agreed as part of the planning application and it may not always be feasible to carry them all out in advance. CBMDC has confirmed that the programme of highways works is normally set out as a planning condition and has proposed revisions to the wording of criterion 4 to reflect this.
- 3.95 Criteria 5 and 8 refer to “quick and easy access” being provided to public transport network and local community facilities. It is considered that this term is vague and imprecise. The Qualifying Body has confirmed that the criteria should be revised to refer to the Accessibility Standards set out in Appendix 3 of the Core Strategy.
- 3.96 Criterion 6 seeks to protect the rights of way network and cyclepaths. There is separate legislation on rights of way which includes provision for the diversion of routes, if necessary. I am therefore recommending that the criterion is revised to accord with the legislation and Core Strategy Policies TR3 and DS4.

- 3.97 Criterion 9 is vague and imprecise. A revision is proposed to ensure that adequate parking provision is made in accordance with the Council's parking standards. The Council has commented that it would be helpful to refer to section 2.15 on parking in their "Homes and Neighbourhoods Design Guide 2020" and to Core Strategy Policy TR2 and Appendix 4. I consider that this policy and guidance should enable developers to provide a suitable standard of parking.
- 3.98 There may be occasions where protected and unprotected trees may require felling as part of development proposals. A recommendation is made to include a degree of flexibility in this criterion.
- 3.99 A representation has been made that supports the use of an overarching policy to set out the principles of new development across the plan area and suggests that Policies H1 to H4 should be deleted as they pre-determine allocations ahead of the Allocations DPD.
- 3.100 Policy H5 sets out design principles applicable to all sites. I am satisfied that Policies H1 – H4 set out site specific requirements for the specified sites drawing on the general principles set out in Policy H5. Policies H1 – H4 are clearly worded so as not to pre-determine the allocation of the sites ahead of the Allocations DPD.

Recommendation 17: Revise Policy H5 as follows:

Revise the first and second criteria to read: "The avoidance of *significant* adverse impacts...."

Revise the third criterion to read: "The avoidance of *unacceptable* adverse impacts...."

Add "*and their settings*" at the end of the second criterion.

Revise criterion 4 to read: "*The programme of highway improvements shall be clearly set out in a planning condition before development commences on the site*".

Combine the fifth and eight criteria and revise to read: "*Accessibility to the public transport network and local community facilities, including educational and health facilities, should be in accordance with the Accessibility Standards set out in Appendix 3 of the Core Strategy;*"

Revise criterion 6 to read: "The protection of existing Public Rights of Way and cycle paths on the site, *where possible, and their integration into the development. Where this is not feasible, the diverted route should not be substantially less convenient for the public to use than the existing route.*"

Revise the ninth criterion to read: "*Adequate in-curtilage off street parking shall be provided in accordance with, or in excess of, the*

indicative standard of 1.5 spaces per dwelling for non-town/city centres (as set out in Core Strategy Policy TR2 and Appendix 4)."

Revise criterion 10 as follows: "Trees that are subject to a Tree Preservation Order and other mature trees shall be safeguarded and protected during development, in accordance with Core Strategy Policy EN5."

Add "and" at the end of the penultimate criterion.

Add the following to the justification on page 45 before Policy H5: "Policy H5 will be taken into account in considering all housing development whether on allocated or non-allocated sites. Developers should take account of the guidance set out in the Bradford Homes and Neighbourhoods Design Guide 2020."

Policy H6: New Housing Development on Non-Allocated Sites

- 3.101 The policy sets out three principles to be applied to considering housing development on non allocated or windfall sites. Development is considered to be acceptable in principle provided that the three principles are met:
1. Development is not on a site that is safeguarded or makes a valuable contribution to the environmental designations in the plan. I have concerns that this does not reflect strategic policy to direct development to sites within the settlement boundary of Haworth and Cross Roads and the exceptional reasons for development of dwellings in the countryside set out in the NPPF.
 2. The development does not exceed the capacity of the infrastructure in respect of transport, education and health. I have concerns about how this aspect of the policy is to be applied by decision makers particularly with small housing developments. CBMDC has provided me with an explanation of how infrastructure needs are addressed by the Council. It would be helpful to plan users to add additional text in the justification to explain how this aspect of the policy is to be applied. Reference may be included to relevant Council documents on the Community Infrastructure Levy.
 3. The third principle seeks to ensure that developments of 5 or more dwellings are in locations that accord with the Accessibility Standards which are set out in the Core Strategy Appendix 3. These standards provide guidance in the application of CS Policy PN1 used in the assessment and selection of sites to be allocated in the Local Plan. These are major development sites of 10 or more dwellings. The guidance sets out that housing development should be within 400 metres of a bus stop served by a half hourly service. Mitigation measures are to be provided as part of the development proposals if the standards cannot be satisfied.

- 3.102 The justification to the policy notes the relevant policies of the Core Strategy and the expectation that development should be focused in Local Service Centres such as Haworth. However, the policy wording does not make reference to the strategic locational principles or to national policy on the location of development in the countryside. I have recommended additional wording to improve the clarity of the policy in this respect.
- 3.103 CBMDC has suggested additional wording to reflect the requirements of strategic policies. That the development is compatible with the character of the settlement, in terms of scale, layout, design and massing as well as making the most appropriate use, where possible, of previously developed land. The development should also be well related to existing services and facilities.
- 3.104 It is considered that it would be helpful to plan users to include an additional paragraph in the justification to make reference to these matters as set out in the strategic design policies.
- 3.105 By their nature, windfall sites are opportunity sites for housing development. Whilst it may be advisable to prioritise sites with easy access to bus stops and community facilities, there be may be reasons that a site outside the accessible locations may be acceptable such as to make good use of previously developed land or to convert a vacant building. It is considered that it would be unnecessarily restrictive to limit windfall housing development only to locations that satisfy the Accessibility Standards. A modification is proposed to revise the policy to set out a preference for these locations.
- 3.106 A representation has been received that states that windfall sites will be covered by the NPPF and the Core Strategy.

Recommendation 18: Revise Policy H6 as follows:

Revise the first paragraph of the policy to read: “....acceptable in principle *in locations within the settlement boundary of Haworth and Cross Roads and where the national and strategic policy exceptions for development in the countryside are satisfied, providing that:*”

Revise the third paragraph of the policy to read: “For developments of 5 or more dwellings, a *location which accords with the applicable Core Strategy Accessibility Standards will be preferred.*”

Add a new paragraph in the justification: “*The Core Strategy Accessibility Standards are set out in Appendix 3 of the Core Strategy.*” Further advice may also be included in the justification on the application of these Accessibility Standards to windfall housing development to assist plan users.

Add a new paragraph in the justification to explain how the capacity of infrastructure will be assessed and the mechanisms for delivering

improvements to infrastructure eg through Community Infrastructure Levy.

Add a new paragraph to the justification to make reference to relevant strategic design policies.

In the 3rd para on page 47, delete “unexpectedly proposed sites” and replace with “windfall sites”.

Policy H7: Housing Density

3.107 The policy proposes a net density in excess of 30 dwellings to the hectare with certain provisos. It is noted that much of the built up area in Haworth is at a density higher than 30 dwellings to the hectare. It is considered that this policy accords with national and strategic policies to minimise the loss of Green Belt / greenfield land by maximising densities on new development sites where appropriate.

Policy H8: Housing Mix

3.108 A Housing Needs Assessment has been undertaken to provide a fine grain assessment of the types, sizes and tenures of property needed by residents of the parish. The summary of the findings is included in the justification to the policy, although the final bullet point that “*there is a relatively small local need for social and affordable rented housing*” does not reflect the findings of the study which identified 49 households in need for such housing.

3.109 Core Strategy Policy HO8 provides the strategic policy on housing mix. The parish Housing Needs Assessment provides a snapshot of the need at 2017 and will assist developers and decision makers in determining the appropriate mix of housing in the parish for the immediate period (usually 5 years). The Plan should recognise that the Housing Needs Assessment will need to be reviewed and updated regularly.

3.110 I am concerned that the policy is not clearly worded and would be difficult for decision makers to apply consistently. The LPA and Qualifying Body have agreed to the revised policy wording. The justification should be revised to be consistent with the wording of the policy.

Recommendation 19: Revise Policy H8 as follows:

Amalgamate first four paragraphs of Policy H8 to read:

“Subject to the findings of the latest housing needs assessment, development of larger housing sites (of 0.4ha or above or 10 or more dwellings) will be expected to provide a mix of market and affordable housing of: two bullet points.”

“*The development of Build to Rent housing will also be encouraged.*”

“The development of sites consisting primarily of large dwellings (4 or more bedrooms) will not be supported.”

Final paragraph not changed.

Revise the first bullet point on page 49 of the justification to read “2-3” bedrooms.

Add a new bullet point on page 49 “*Supporting the provision of Build for Rent housing.*”

Employment and Tourism

- 3.111 The introduction to the section notes the Core Strategy policies and their support for sustainable economic growth in the area. The last sentence on page 51 is worded negatively and I have recommended revisions to it. Reference in this and the subsequent paragraph to “the parish council” should be amended to “the Plan”.
- 3.112 The plan seeks to support the local tourism economy by supporting the development of hotel and visitor accommodation.

Recommendation 20:

Replace the last two sentences on page 51 with: “*These policies will provide the framework for considering proposals for new employment development or the diversification of existing rural businesses in the plan area. No employment land allocations are proposed in the Plan.*”

Revise the second sentence of the first paragraph on page 52 to read: “...during consultation, and the *Plan supports the development of appropriate hotel and visitor accommodation within the Neighbourhood Area.*”

Policy E1: Hotel Development

- 3.113 The policy supports hotel development and sets out the criteria for considering proposals. Revisions are recommended to improve the clarity of the policy wording. The policy makes no reference to the design of the development or consideration of its impact on the conservation areas and I have therefore recommended the inclusion of a reference to Policy BHDD1.

Recommendation 21: Revise Policy E1 as follows:

Revise the first paragraph to read: “*Hotel development will be supported in the Plan area. Any such....*”

Revise the final bullet point to read: “*It should not have an unacceptable adverse impact on residential amenity, including noise and light intrusion.*”

Add a new bullet point: “*Where applicable, the development shall be laid out and designed taking into account the principles of Policy BHDD1.*”

Policy E2: Visitor Accommodation

- 3.114 The policy encourages the development and retention of locally based visitor accommodation subject to it respecting the important landscape and heritage designations.
- 3.115 Neighbourhood plan policies will be used in considering development proposals. They will not be applied to the retention of a particular use unless there are reasons to safeguard it. The Qualifying Body has suggested that their intention was that hotels should be safeguarded in the same way as community facilities under Policy CF1. However, the policy has not been worded in a way to achieve this. I am therefore recommending that reference to “retention” should be deleted.
- 3.116 It is not clear what “locally based” accommodation is. I am recommending that reference to “locally based” should be deleted.
- 3.117 It is considered that the final paragraph of the policy is vague and imprecise. It is acknowledged that Core Strategy Policy EC4(F) encourages the development of tourism and leisure based activities whilst “*having regard to accessibility and sustainable transport, local character and design*”. It is the role of neighbourhood plan policies to provide locally specific details to aid in the application of strategic policies. It is therefore recommended that the second paragraph should refer to the development being well designed and should take account of the principles set out in Policy BHDD1. It is not clear what factors are to be taken into account in having “regard to accessibility and sustainable transport” in considering development proposals so I am recommending that the terms should be deleted.

Recommendation 22: Revise Policy E2 to read:

***“The development of visitor accommodation will be supported where it respects the character of the local landscape of the South Pennines and conserves and enhances the heritage of Haworth and the conservation areas.*”**

“New accommodation should be well designed to reflect the built character of the area and have regard to the principles set out in Policy BHDD1 and relevant development plan policies.”

Delete the second paragraph of the policy.

Policy HT1: Haworth Centre Public Parking

- 3.118 The policy seeks to safeguard 11 public car parking areas which are shown on the Policies Map. Compensatory car parking provision within Haworth centre is “expected” should any development result in the loss. In view of the importance of the public car parks in serving the town centre and tourism locations and the likely impact of their loss, to improve the clarity of the policy it is recommended that this should be a requirement.
- 3.119 The car parks should be named and numbered in the policy as listed on the Policies Map key for consistency and clarity.
- 3.120 The second paragraph of the policy seeks to encourage appropriate development that provides additional centre car parking. It is considered that this wording is unclear. The Qualifying Body has confirmed that it is the intention of the policy to encourage development that provides additional public car parking.
- 3.121 The policy includes the imprecise term “*acceptable in principle*”. It is not appropriate for a policy to indicate that proposals will be permissible as all planning applications “*must be determined in accordance with the development plan, unless material considerations indicate otherwise*”. The term “*will be expected to*” does not provide a basis for the determination of planning applications. I have recommended a modifications to improve the clarity of the wording of the policy so that decisions makers can apply it consistently as required by national policy.

Recommendation 23: Revise Policy HT1 as follows:

Revise the first sentence of the policy to read: “...public car parking areas, as listed below and shown on the Neighbourhood Plan Policies Map should not result in the loss of car parking capacity.”

Revise the second sentence of the policy to read: “...capacity will be required within Haworth centre.”

Include the numbered list of public car parks in the policy.

Revise the second paragraph of the policy to read: “Development which would provide for additional centre public car parking capacity, will be supported.”

Policy HT2: Protection of Private Non-Residential Parking Areas

- 3.122 The policy seeks to safeguard 12 private car parking areas which are shown on the Policies Map. These serve churches, community halls, social clubs and the railway. Any development proposals would have to demonstrate that

their loss will not impact on parking in the nearby area and compensatory car parking provision nearby would be provided.

3.123 The policy is negatively worded and modifications are proposed to improve its clarity.

3.124 Car park 7 Damside Mill has been plotted incorrectly on the Policies Map.

Recommendation 24: Revise Policy HT2 as follows:

Revise the first paragraph of the policy to read: “.....Policies Map, *should demonstrate*.”

Revise criterion i) to read “that the loss will not have an adverse impact on parking issues in the nearby area; or”

Correct the location of Car Park 7 Damside Mill on the Policies Map.

Policy HT3: Primary School Parking and Drop-Off Areas

3.125 This policy encourages the development of parking to serve the primary schools in the plan area. It is not clear how this aspiration is to be delivered; nevertheless, there is a clear need for improved parking to serve the schools. A recommendation is made to replace “encouraged” with “supported” for consistency and clarity.

Recommendation 25: Revise Policy HT3 as follows:

Replace “will be encouraged” with “will be *supported*”.

Policy HT4: Car Parking Standards for New Housing Development at Baden Street, Haworth

3.126 The policy is linked to criterion 6 of Policy H3. It is considered that the requirements are vague and imprecise as they do not set out the standard of parking required other than it should be “in excess of 1.5 spaces per unit”.

3.127 I have made a recommendation to revise the sixth bullet point under Policy H3 to read: “*Provision of off-road parking in accordance with section 2.15 of the Bradford Homes and Neighbourhoods Design Guide 2020, Core Strategy Policy TR2 and Appendix 4.*” It is considered that as a consequence Policy HT4 is unnecessary and should be deleted.

Recommendation 26: Delete Policy HT4.

Policy HT5: Improved Public Transport

- 3.128 The policy seeks contributions to new and improved bus services and associated infrastructure from developments that are likely to be served by and increase patronage of public transport. It also highlights the importance of new routes to Bradford Royal Infirmary and Halifax.
- 3.129 CBMDC has explained that they consult the West Yorkshire Combined Authority on all major applications to identify any improvements to public transport infrastructure required to serve the development, usually bus stops and shelters. The requests are considered in terms of the overall viability of the scheme.
- 3.130 It is not possible to define which developments are likely to be served by or increase patronage of public transport. To clarify the policy it is recommended that the policy should refer to “major developments” in line with the local authority practice. This term is defined in the Glossary in Appendix 10.
- 3.131 The aspirations for new routes are also included as a Community Action.

Recommendation 27: Revise Policy HT5 to read:

“Major developments should contribute to improving public transport services, and associated infrastructure, where necessary to serve the development.”

“New bus routes between the Neighbourhood Area and Bradford Royal Infirmary and Halifax will be supported.”

Policy HT6: Improved Walking, Horse Riding and Cycling Provision

- 3.132 The first part of the policy expects development directly affecting the public rights of way and cycleway network to be compatible with it and contribute to it.
- 3.133 The second paragraph of the policy seeks contributions from development likely to increase pedestrian footfall and /or horse or cycle usage to contribute to improvements or new provision in the vicinity and to provide connections to the network. A list of routes is included in the Community Actions.
- 3.134 The third paragraph encourages development proposals that comply with other policies of the plan that would add to or improve the rights of way or cycling network. It is unclear what types of development proposals are to be encouraged. I have proposed a modification that gives support to the extension and/or improvement of the network.
- 3.135 The term “will be expected to” is unclear and does not provide a basis for the determination of planning applications. The second paragraph of the policy

requires development likely to increase usage of the network to provide connections or to contribute to new provision. This would affect development with only a marginal impact on the network and is both too onerous and not justified by the evidence, I have recommended the addition of the word “significant” and the word “should” to clarify the application of the policy and to introduce some flexibility.

Recommendation 28: Revise Policy HT6 as follows:

In the first paragraph, replace “will be expected to” with “must”.

Revise the second paragraph to read: “Development likely to *significantly* increase pedestrian footfall and or horse/cycle usage within the network *should* contribute to the improvements to the *cycle routes and rights of way network listed in the Community Actions* and shown on the Neighbourhood Plan Policies Map,”

Replace the third paragraph with: “*The improvement of the rights of way, bridleway and cycle network will be supported.*”

Policy HT7: Keighley and Worth Valley Cycleway

- 3.136 The first paragraph of the policy seeks to safeguard the route of the Keighley and Worth Walley cycleway. A modification is recommended to clarify the wording of the policy to refer to it being safeguarded.
- 3.137 The second paragraph encourages development that would contribute to the delivery of the proposed route. It is not clear what type of development may be appropriate. I am recommending a modification that supports the development of the route as a cycle route.

Recommendation 29: Revise Policy HT7 as follows:

Revise the first paragraph to read: “...Neighbourhood Area, shown on the Neighbourhood Plan Policies Map *is safeguarded*. Development *should not* prevent or harm the development of a cycle route along the identified route. *The delivery and improvement of the safeguarded route as a cycle way will be supported.*”

Monitoring and Review

- 3.138 I make no comments on this section.

4.0 Referendum

- 4.1 The Haworth, Cross Roads & Stanbury Neighbourhood Plan reflects the views held by the community as demonstrated through the consultations and, subject to the modifications proposed, sets out a realistic and achievable vision to support the future improvement of the community.
- 4.2 I am satisfied that the Neighbourhood Plan meets all the statutory requirements, in particular those set out in paragraph 8(1) of schedule 4B of the Town and Country Planning Act 1990 and, subject to the modifications I have identified, meets the Basic Conditions namely:
- has regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contributes to the achievement of sustainable development;
 - is in general conformity with the strategic policies contained in the Development Plan for the area; and
 - does not breach, and is otherwise compatible with, EU obligations and human rights requirements
- 4.3 **I am pleased to recommend to The City of Bradford Metropolitan District Council that the Haworth, Cross Roads & Stanbury Neighbourhood Plan should, subject to the modifications I have put forward, proceed to referendum.**
- 4.4 I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. In all the matters I have considered I have not seen anything that suggests the referendum area should be extended beyond the boundaries of the plan area as they are currently defined. I recommend that the Neighbourhood Plan should proceed to a referendum based on the neighbourhood area designated by the City of Bradford Metropolitan District Council on 5 November 2013.

5.0 Background Documents

5.1 In undertaking this examination, I have considered the following documents

- Haworth, Cross Roads & Stanbury Neighbourhood Plan Submission Draft Version 2019- 2030 including Appendices
- Haworth, Cross Roads & Stanbury Neighbourhood Plan Basic Conditions Statement June 2019
- Haworth, Cross Roads & Stanbury Neighbourhood Plan SEA / HRA Screening Report July 2018
- Haworth, Cross Roads & Stanbury Neighbourhood Plan HRA Screening Update Report May 2019
- Haworth, Cross Roads & Stanbury Neighbourhood Plan Sustainability Assessment June 2019
- Haworth, Cross Roads & Stanbury Neighbourhood Plan Consultation Statement June 2019
- National Planning Policy Framework 2019
- Planning Practice Guidance March 2014 (as amended)
- The Town and Country Planning Act 1990 (as amended)
- The Localism Act 2011
- The Neighbourhood Planning (General) Regulations 2012
- Bradford Core Strategy 2017
- Saved Policies of Bradford Replacement UDP 2005
- Haworth Conservation Area Appraisal 2007
- Stanbury Conservation Area Appraisal 2008
- Shop Front Design Guide and the Shopkeepers Guide to Securing the Premises SPDs
- Bradford Homes and Neighbourhoods Design Guide 2020

6.0 Summary of Recommendations

Recommendation: 1

Add the following on page 13, 7th paragraph under Chapter 5: The Plan Policies and Community Actions: *“It should be noted that the Community Actions and Approaches do not form part of the statutory Development Plan.”*

Add the following on page 61 under the first paragraph - Chapter 5 of this plan: *“It should be noted that the Community Actions and Approaches do not form part of the statutory Development Plan.”*

Recommendation 2: Improve the mapping of the Plan by:

Number the viewpoints on the Stanbury map in Appendix 1 of the Plan to correspond to the subsequent photographs. Place the maps of views within the text of the Plan itself.

Ensure that the Non-Designated Heritage Assets are shown in numeric order within each category in the key to the Policies Map and the assessment report. (See Recommendation 8)

Delete the heading “Non Neighbourhood Plan Designations” from the key to the Policies Map. Place the notation under topic headings of Built Heritage, Housing and Highways and Travel.

Ensure the colouring in the key for the South Pennines SPA/SAC is consistent with that on the map.

Prepare a background evidence report for the Non Designated Heritage Assets to include the assessment details currently in Appendix 3 and include site location maps showing the boundaries of the properties designated and buildings referred to.

Recommendation 3: Include a new section in the Introductory section of the Plan to explain the Strategic Planning Context for the Plan and the timescales for preparing the emerging Core Strategy Partial Review and Allocations DPD. Explain the status of the villages in the settlement hierarchy and the level of growth anticipated in the strategic plan to provide the context for the housing and employment policies in the HCR&SNP. Explain how it is intended that the requirements set out in Policies H1 – H4 are to be taken forward.:

“The adopted local plan for the area comprises

- *“the Bradford Core Strategy (CS) adopted in 2017 which sets out the broad scale and distribution of growth as well as policies to protect and enhance the natural and built environment, and*

guide/manage development across Bradford district for the period 2011 to 2030; and

- *“the saved policies of the Replacement Unitary Development Plan (RUDP), adopted in 2005 which includes a number of policies that are relevant to the neighbourhood plan, including the defined Green Belt boundaries.*

“CBMDC is currently undertaking a partial review of its Core Strategy. This review is due to various changes to national planning policy and local circumstances, and covers several subjects including a proposed new plan period (2020 to 2037), revised housing and employment land requirements and spatial distribution as well as various environment and transport policies. Work reached the Preferred Options stage in July 2019. Further consultation (a revised Preferred Options) is due to take place in 2020, with a submission draft being published in 2021.

“Work is also on-going to prepare an Allocations DPD that will identify sites to meet the requirements of the Core Strategy Partial Review. The Allocations DPD is at an early stage of preparation: the Issues and Options paper was consulted on in 2016 and the Preferred Options is currently being prepared.”

“Strategic Planning Context for the Neighbourhood Plan - Level of Growth & Development

“For spatial planning purposes, CBMDC has split its area into four sub-areas (City of Bradford; Airedale; South Pennine Towns & Villages; and Wharfedale). The neighbourhood plan area is situated within the South Pennine Towns & Villages sub-area.

“The settlement hierarchy is defined in Core Strategy Policy SC4. Under this policy, Haworth is classed as a Local Service Centre, where the emphasis will be 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. Cross Roads is not specifically referred to as a separate settlement within the hierarchy. Figure SS2 within the Core Strategy shows the extent of Haworth and Cross Roads.

“Stanbury is classed under saved RUPD policy K/GB3.5 as being washed over by the Green Belt. It is not specifically referred to in the Core Strategy settlement hierarchy.

“Under Core Strategy Policies PN1 and HO3, Haworth will see the development of 400 homes over the adopted plan period (2011 to 2030). Within the Core Strategy Partial Review, it is proposed to reduce this requirement to 275 dwellings over the revised plan period (2020 to 2037). The sites to accommodate this growth will be identified in the

emerging Allocations DPD. A specific level of employment development is not identified for the neighbourhood plan area.

“In terms of the retail hierarchy (Core Strategy Policy EC5), Main Street and Mill Hay in Haworth, and Cross Roads are identified as Local Centres. The policy states that these centres should be the focus for appropriately sized local supermarkets and a variety of small shops of a local nature to meet people’s day to day needs and minimise their need to travel.

“Development in Stanbury is restricted by saved RUDP Policy GB3 to infill development, provided that it falls within the infill boundary of the settlement, as defined on the Proposal Map, fills a small gap in a small group of buildings and is related to the scale of the settlement and does not adversely affect the character of the settlement or its surroundings. Also it should not result in the loss of open space which is important to the character, visual amenity and local identity of the settlement. Proposals for the extension of the settlement will not be permitted.

“Implementation of Policies H1 to H4

“The policies, as drafted, leave any formal designation/allocation of these sites to the Local Plan Allocations DPD which CBMDC is in the process of preparing. Work is underway on assessing the suitability of all sites within the Strategic Housing Land Availability Assessment (SHLAA), including those listed in Policies H1 to H4 of the Haworth, Cross Roads & Stanbury Neighbourhood Plan, using an agreed site selection methodology. The results of this work, together with the evidence base, Sustainability Appraisal and Habitat Regulations Assessment will inform which sites are identified in the Preferred Options version of the Allocations DPD, due for publication later in 2020.

“Should all or any of these sites be allocated in the Allocations DPD, it would be expected that the policy considerations set out in the neighbourhood plan Policies H1 to H4 will be used in determining planning applications on them.

“It should be noted the Ebor Mills site (Policy H4) is the subject of a pending planning application (Application Ref: 19/04426/MAF). It is for the conversion and refurbishment of Ebor Mills into 14 dwellings, construction of 24 new dwellings within the curtilage of the site, landscaping, biodiversity and environmental enhancements, highway and footway improvements to Ebor Lane and demolition of the weaving sheds and partial demolition and reconstruction of the boiler house. An application for Listed Building Consent (Application Ref: 19/04425/LBC) is also pending.”

Recommendation 4: Revise Policy BHDD1 as follows:

Revise the first paragraph of the policy to read: “..... Policies Map, *development including*local characteristics and *have regard* to the following *design principles*:”.

Revise the second bullet point to read: “*The need to maintain and respect the views and vistas into, out of, and through the conservation area shown on the maps in Appendix 1 and demonstrate the impact of their proposal on any views.*”

Revise bullet point 3 to read: “Reflect, *where possible*,”

Revise bullet point 4 to read: “...that reflect the *architectural and/or historic* interest of the area.....”

Revise bullet point 9 to read: “....the reinstatement of traditional features *of a similar design to the original* should be.....”

Revise bullet point 10 to read: “*Retain* traditional shopfronts; any new or replacement shopfronts *reflecting*.....”

Revise bullet point 11 to read: “*Retain* important trees.....”

Revise bullet point 12 to read: “*Retain* key open spaces.....”

Revise the penultimate paragraph of the policy to read: “....respects the distinctiveness of the conservation area.”

Replace the fourth sentence from the first paragraph on page 17: “This appraisal however is now out of date.....development” with “*A review of this appraisal is due.*”

Revise the second paragraph on page 17 to read: “*The designation of the conservation area recognises its historic and architectural importance. New development proposals within or adjacent to it should be designed to be sympathetic to the area’s special character and avoid the destruction of....*”

Add a new paragraph in the justification: “*The City of Bradford MDC Shop Front Design Guide and the Shopkeepers Guide to Securing the Premises SPDs set out detailed guidance on the design of shopfronts in historic areas.*”

Recommendation 5: Delete Policy BHDD2

Retitle Policy BHDD1 as “Haworth and Stanbury Conservation Areas – Development and Design”.

Replace the fourth sentence of the second paragraph on page 21: “As with Haworth, this appraisal is now out of date.....development.” with “*A review of this appraisal is due.*”

Correct the typographical error in the 6th bullet point on page 21 to “dependent”.

Amalgamate the duplicated text on pages 17 and 21.

Recommendation 6: Revise Policy BHDD3 as follows:

Revise the final line of the policy to read: “*The conservation and sympathetic enhancement of these areas to better reveal their significance will be encouraged in accordance with the design principles set out in Policy BHDDX.*”

Recommendation 7: Amalgamate Policies BHDD4 – BHDD7 and entitle the new policy Local Heritage Areas – Development and Design.

Recommendation 8: Revise Policy BHDD8 as follows:

Revise the first paragraph and amalgamate with the last paragraph of the policy to read “.....Policies Map and described in the Non Designated Heritage Asset Assessment Report, will be taken.....such an asset. *A balanced judgement will be made having regard to the scale of any harm or loss caused by any development and the asset's significance. Their conservation and sympathetic enhancement will be supported.*

Prepare a more detailed assessment report of the non-designated heritage assets including the assessment contained in Appendix 3 and include full details of the process of identifying and the criteria for assessing the properties, plans showing the location of each property and its curtilage. Photographs would also be helpful.

Revise the assessment on the former Mill pond at Ebor Mills to refer to the Local Wildlife Site designation.

Recommendation 9: Revise Policy GE1 as follows:

Add the following to the end of the final paragraph of the policy: “....in accordance with the Core Strategy policies.”

Revise the final sentence of the third paragraph under the sub-heading Landscape, Biodiversity/Geodiversity and Green Infrastructure (page 30) to read: “Further designated sites of regional or local interest include *the four Local Wildlife Sites (LWS) of Airedale Spring Mill Pond, Baden Street (Haworth), Brow Moor with Sugden End, and Penistone Hill. The last of these is also a Country Park*”. These sites should be identified on the Policies Map.

Revise the second paragraph of the justification on page 31 to read: “*The Core Strategy sets out a comprehensive suite of policies on*

national and strategic green infrastructure. The neighbourhood plan can build on this by.....”

Update the third paragraph on page 31 to refer to the Bradford Ecological Habitat Network and the sites identified.

Update the Plan, SEA and background documents to refer to the four following sites as Local Wildlife Sites and to consider and acknowledge the potential conflicts that may occur with other designations and possible proposals on the sites.

- Brow Moor with Sugden End
- Penistone Hill
- Airedale Spring Mill Pond
- Baden Street, Haworth.

Recommendation 10: Revise Policy GE2 as follows:

Revise the second sentence of the first paragraph of the policy to read: “Development on these areas will not be *supported* except in very special circumstances that justify the development.”

Correct the numbering of the sites at West Lane Methodist Chapel Burial Grounds and West Lane Baptist Church Burial Grounds in the Policy, Appendix 5 and the Policies Map.

Delete “(NB proposed LGS 137”) from the LGS assessment for site LGS133.

Recommendation 11: Revise the wording of Policy GE3 to read:

“The enhancement of a designated Local Green *Space to improve the quality or usability of the open space* will be supported.”

Amalgamate the policy with Policy GE2 by adding the above paragraph to the end of Policy GE2 and deleting Policy GE3. Amalgamate the justifications to the policies.

Recommendation 12: Revise Policy GE4 as follows:

Revise the first paragraph of the policy to read: “The provision of new open space in the following categories will be *supported*.”

Revise the second paragraph of the policy to read: “.....north Haworth *will be supported*.”

Recommendation 13: Revise Policy GE5 as follows:

Add the word “and” at the end of the penultimate criterion in Policy GE5.

Revise the last sentence of the 2nd paragraph on page 35 to read:
“....Sugden End Local Wildlife Site, details of which are included in Appendix 6.”

Recommendation 14: Revise Policy CF1 as follows:

Revise the first paragraph of the policy to read: “....Policies Map, will only be supported, where:”

Divide the second bullet point into two and create a third bullet point: “it is financially unviable.”

Revise the second paragraph of the policy to read: “The *improvement of* these facilities for the benefit of Haworth, Cross Roads or Stanbury communities will be *supported*.”

Add the following after the third paragraph on page 37:

“Where proposals involve the loss of a community facility, developers will be expected to demonstrate that the facility, and its continued use, is no longer economically viable, and that all reasonable efforts have been made to market the site/facility for its current use without success.”

In Appendix 7 add the numbers to the Community Facilities as shown on the Policies Map. Include site locations plans in the Appendix.

Recommendation 15: Revise Policy CF2as follows:

Revise the first paragraph of the policy to read: “...will be *supported*, in particular:”

Recommendation 16: Revise Policies H1 to H4 as follows:

Revise the first paragraph of each policy to read: “..... Policies Map, *should be laid out and designed in accordance with the following design principles:*”

Add the word “*and*” to the end of the penultimate criterion in Policies H1 – H4.

Add the following at the end of each policy: “*Where it is not possible to satisfy any of the design principles, developers will be required to demonstrate the reasons for non-compliance in their Design and Access Statement.*”

Add the following to the fourth bullet point in Policy H1: “*in accordance with the strategic policy*”.

Revise the first bullet point of Policy H2 to read: “*Trees that are subject to a Tree Preservation Order and other mature trees shall be*

safeguarded and protected during development, in accordance with Core Strategy Policy EN5.

Revise bullet points 3 and 4 of Policy H3 to read “***Bradford Local Wildlife Site***”.

Revise the sixth bullet point in Policy H3 to read: “***Provision of off-road parking in accordance with, or in excess of, section 2.15 of the Bradford Homes and Neighbourhoods Design Guide 2020, Core Strategy Policy TR2 and Appendix 4.***”

Delete the first paragraph of Policy H4: “***The site of Ebor Mills....new housing.***”

Add the following to the justification on page 42 before Policy H1: “***Developers should take account of the guidance set out in the Bradford Homes and Neighbourhoods Design Guide 2020.***”

Delete “***This Neighbourhood Plan cannot influence the outcome or vary from whatever is finally decided***” from the paragraph in the justification under Policy H4.

Recommendation 17: Revise Policy H5 as follows:

Revise the first and second criteria to read: “***The avoidance of significant adverse impacts....***”

Revise the third criterion to read: “***The avoidance of unacceptable adverse impacts....***”

Add “***and their settings***” at the end of the second criterion.

Revise criterion 4 to read: “***The programme of highway improvements shall be clearly set out in a planning condition before development commences on the site***”.

Combine the fifth and eight criteria and revise to read: “***Accessibility to the public transport network and local community facilities, including educational and health facilities, should be in accordance with the Accessibility Standards set out in Appendix 3 of the Core Strategy;***”

Revise criterion 6 to read: “***The protection of existing Public Rights of Way and cycle paths on the site, where possible, and their integration into the development. Where this is not feasible, the diverted route should not be substantially less convenient for the public to use than the existing route.***”

Revise the ninth criterion to read: “***Adequate in-curtilage off street parking shall be provided in accordance with, or in excess of, the indicative standard of 1.5 spaces per dwelling for non-town/city centres (as set out in Core Strategy Policy TR2 and Appendix 4)***”

Revise criterion 10 as follows: “Trees that are subject to a Tree Preservation Order and other mature trees shall be safeguarded and protected during development, in accordance with Core Strategy Policy EN5.”

Add “and” at the end of the penultimate criterion.

Add the following to the justification on page 45 before Policy H5: “Policy H5 will be taken into account in considering all housing development whether on allocated or non-allocated sites. Developers should take account of the guidance set out in the Bradford Homes and Neighbourhoods Design Guide 2020.”

Recommendation 18: Revise Policy H6 as follows:

Revise the first paragraph of the policy to read: “.....acceptable in principle in locations within the settlement boundary of Haworth and Cross Roads and where the national and strategic policy exceptions for development in the countryside are satisfied, providing that:”

Revise the third paragraph of the policy to read: “For developments of 5 or more dwellings, a location which accords with the applicable Core Strategy Accessibility Standards will be preferred.”

Add a new paragraph in the justification: “The Core Strategy Accessibility Standards are set out in Appendix 3 of the Core Strategy.” Further advice may also be included in the justification on the application of these Accessibility Standards to windfall housing development to assist plan users.

Add a new paragraph in the justification to explain how the capacity of infrastructure will be assessed and the mechanisms for delivering improvements to infrastructure eg through Community Infrastructure Levy.

Add a new paragraph to the justification to make reference to relevant strategic design policies.

In the 3rd para on page 47, delete “unexpectedly proposed sites” and replace with “windfall sites”.

Recommendation 19: Revise Policy H8 as follows:

Amalgamate first four paragraphs of Policy H8 to read:

“Subject to the findings of the latest housing needs assessment, development of larger housing sites (of 0.4ha or above or 10 or more dwellings) will be expected to provide a mix of market and affordable housing of: two bullet points.”

“The development of Build to Rent housing will also be encouraged.”

“The development of sites consisting primarily of large dwellings (4 or more bedrooms) will not be supported.”

Final paragraph not changed.

Revise the first bullet point on page 49 of the justification to read “2-3” bedrooms.

Add a new bullet point on page 49 “Supporting the provision of Build for Rent housing.”

Recommendation 20:

Replace the last two sentences on page 51 with: “*These policies will provide the framework for considering proposals for new employment development or the diversification of existing rural businesses in the plan area. No employment land allocations are proposed in the Plan.*”

Revise the second sentence of the first paragraph on page 52 to read: “...during consultation, and the *Plan supports the development of appropriate hotel and visitor accommodation* within the Neighbourhood Area.”

Recommendation 21: Revise Policy E1 as follows:

Revise the first paragraph to read: “*Hotel development will be supported in the Plan area. Any such....*”

Revise the final bullet point to read: “*It should not have an unacceptable adverse impact* on residential amenity, including noise and light intrusion.”

Add a new bullet point: “*Where applicable, the development shall be laid out and designed taking into account the principles of Policy BHDD1.*”

Recommendation 22: Revise Policy E2 to read:

“*The development of visitor accommodation will be supported where it respects the character of the local landscape of the South Pennines and conserves and enhances the heritage of Haworth and the conservation areas.*

“*New accommodation should be well designed to reflect the built character of the area and have regard to the principles set out in Policy BHDD1 and relevant development plan policies.*”

Delete the second paragraph of the policy.

Recommendation 23: Revise Policy HT1 as follows:

Revise the first sentence of the policy to read: “...public car parking areas, *as listed below* and shown on the Neighbourhood Plan Policies Map *should not result in the loss of car parking capacity.*”

Revise the second sentence of the policy to read: “...capacity will be *required* within Haworth centre.”

Include the numbered list of public car parks in the policy.

Revise the second paragraph of the policy to read: “Development which would provide for additional centre public car parking capacity, will be *supported.*”

Recommendation 24: Revise Policy HT2 as follows:

Revise the first paragraph of the policy to read: “.....Policies Map, *should demonstrate.*”

Revise criterion i) to read “that the loss will not have an adverse impact on parking issues in the nearby area; or”

Correct the location of Car Park 7 Damside Mill on the Policies Map.

Recommendation 25: Revise Policy HT3 as follows:

Replace “will be encouraged” with “will be *supported*”.

Recommendation 26: Delete Policy HT4.

Recommendation 27: Revise Policy HT5 to read:

“*Major* developments should contribute to improving *public transport* services, and associated infrastructure, *where necessary to serve the development.*”

“New *bus* routes between the Neighbourhood Area and Bradford Royal Infirmary and Halifax *will be supported.*”

Recommendation 28: Revise Policy HT6 as follows:

In the first paragraph, replace “will be expected to” with “must”.

Revise the second paragraph to read: “Development likely to *significantly* increase pedestrian footfall and or horse/cycle usage within the network *should* contribute to the improvements to the *cycle routes and rights of way network listed in the Community Actions* and shown on the Neighbourhood Plan Policies Map,

Replace the third paragraph with: “*The improvement of the rights of way, bridleway and cycle network will be supported.*”

Recommendation 29: Revise Policy HT7 as follows:

Revise the first paragraph to read: “...Neighbourhood Area, shown on the Neighbourhood Plan Policies Map *is safeguarded*. Development *should not* prevent or harm the development of a cycle route along the identified route. *The delivery and improvement of the safeguarded route as a cycle way will be supported.*”