

Bradleys Both Neighbourhood Plan

Summary of Representations submitted to the independent examiner in accordance with para 9 of Schedule 4B of the Town and Country Planning Act 1990.

These representations were received under Regulation 16 of The Neighbourhood Planning (General) Regulations 2012 during a 7 week public consultation period on the submitted Bradleys Both Neighbourhood Plan held from 12th December 2022 to 30th January 2023.

Bradleys Both Parish Council submitted its draft Neighbourhood Plan to (the former) Craven District Council for independent examination in October 2022.

Name of Representor/ Link to Representation	Policy/Section of Bradleys Both Neighbourhood Plan commented on	Summary of Representation received
National Grid Link to full representation	General comment	National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.
Sport England Link to full representation	General comment	<p>Sport England sets out that the Neighbourhood Plan should reflect and comply with national planning policy for sport as set out in the NPPF with particular reference to Paras 98 and 99, as well as being underpinned by robust and up to date evidence.</p> <p>If new or improved sports facilities are proposed Sport England recommends they are fit for purpose and designed in accordance with their design guidance notes.</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered.</p>
Natural England Link to full representation	General comment	Natural England does not have any specific comments on this Submitted Bradley Neighbourhood Development Plan.
Historic England Link to full representation	General comment	Historic England provided detailed comments upon the Pre-submission Draft of the Bradleys Both Neighbourhood Plan, in their letter of 6th May 2016.

		Historic England note that their advice has been considered, acted upon, and where appropriate, revisions have been made to the Draft Neighbourhood Plan. Historic England do not therefore consider it necessary to make further comments on the Submission Draft of the Neighbourhood Plan.
Historic England (2) Link to full representation	Policy ENV1: Local Green Spaces	<p>Following Historic England's letter of 16th January 2023, it has been drawn to their attention that an area of Local Green Space identified in the Bradleys Both Parish Council Neighbourhood Development Plan 2016-2031 has been omitted from the Submission Draft Bradleys Both Parish Council Neighbourhood Development Plan Up to 2032.</p> <p>Historic England considers it inappropriate for this area to be excluded from the Local Green Space Policies Map. Given that both Craven District Council and (insofar as it can exercise Planning function) Bradleys Both Parish Council have a statutory responsibility to pay "special attention" to the "desirability of preserving or enhancing the character or appearance of its Conservation Areas" this is particularly important.</p>
Coal Authority Link to full representation	General comment	If the Neighbourhood Plan intends to allocate sites for future development, consideration will need to be given to the potential risks posed to surface stability by past coal mining activity.
Pendle Borough Council Link to full representation	General comment	Having reviewed the proposals Pendle Borough Council can confirm that the Bradley Neighbourhood Plan does not affect any cross boundary strategic issues relevant to Pendle Borough. As such Pendle Borough Council holds no objection to the Bradley Neighbourhood Plan as submitted.
M & S Scully Link to full representation	Policy HOU1: Land at Skipton Road, Bradley (Neighbourhood Plan Site Ref. BB03)	Comments and objections to the housing proposal off Skipton Road referred to within the report as BB03. Concerns about additional traffic and parking on Skipton Road, safe access to the site, need for pavement from site to local facilities, and the need for traffic calming as part of development brief to address speeding concerns in the vicinity.

<p>S Hodgson Link to full representation</p>	<p>Policy HOU1: Land at Skipton Road, Bradley (Neighbourhood Plan Site Ref. BB03)</p>	<p>Opposition to development on this land due to waterlogged conditions on site from springs in the middle of the field, close to the footpath. Need to ensure the appropriate disposal of water run-off from the springs, wastewater, and sewerage from all the new houses to be built on the site. Development will also add to the traffic problems in Skipton Road.</p>
<p>G Hammond Link to full representation</p>	<p>Policy ENV1: Local Green Spaces</p>	<p>Comment that the field off College Road between Primrose Hill and the listed properties off College Road to the north of Primrose Hill, and the adjoining field behind St Mary's church are no longer identified as local green space. This should be reconsidered, and these fields should be identified as local green space within the plan to recognise the history of the village and the importance of crofts and the farming heritage.</p>
<p>A & D Binns and co-signatories Link to full representation</p>	<p>Policy ENV1: Local Green Spaces</p>	<p>The final draft of the NDP was submitted to Craven District Council (CDC) on 18th October 2022 but contains a key alteration from the previous draft of the plan, which does not appear to have been brought to the notice of local residents or widely publicised or been subjected to scrutiny. That alteration (to the Village inset Map, Appendix 2) shows that the Green Space designation has been removed from the site "Land to the East of College Road" and has received neither an ENV1 "Local Green Space" or an ENV3 "Conserving the landscape" designation and is effective "white" land.</p> <p>Objection to the removal of this Green Space designation. The Land has landscape value, architectural and historic interest, makes a strong contribution to Bradley Conservation Area and the setting of nearby grade II listed building (acknowledged in an appeal decision from 1991), is valued open space along College Road, and provides highly significant, public views of the village graveyard. There is also concern that Bradley Parish Council cannot explain why the land in question was removed from the draft NDP, following advice from CDC to reduce the number of green spaces designated. The land is Grade 3 (DEFRA) farmland which maintains significant agricultural value. The area has significant historical context (Bradley is mentioned in the Domesday Book) and the farm on the site of College House and</p>

		College Cottage paid rent to Bolton Priory as far back as 1290. Finally, the site is at risk of further planning applications for housing in this congested, built-up area.
Craven District Council Link to full representation	Policy ENV1: Local Green Spaces	The Council's representation raises no new issues or concerns in response to the submitted Bradleys Both Neighbourhood Plan. The Council sets out for the Examiner a summary of previous comments provided to Bradley Parish Council in relation to the development of policy ENV1 during the pre-submission stages of neighbourhood plan preparation, and in relation to compliance with the Council's LGS Methodology. Throughout the pre-submission stages the Council has queried the assessment of various proposed sites as extensive tracts of land, and also whether consultation with landowners and statutory consultees took place with regards to all the proposed local green spaces. The Council also sets out the conclusions drawn from the Strategic Environmental Assessment of the Neighbourhood Plan, in relation to the extent of local green space proposed for designation, and whether this would have an impact on the future development of land for housing in Bradley beyond the plan period.