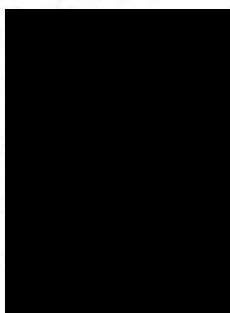
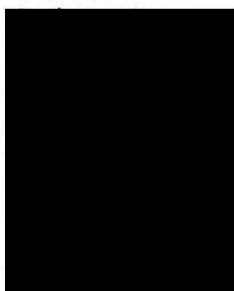
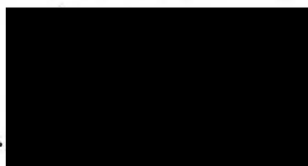


Bradleys Both Neighbourhood Development Plan

I wish to be notified about the result of the Examination under Regulation 16(iv)



If you need to contact us to discuss ,



Bradleys Both Development Plan – Plot SHLAA No BR011

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11. Letter from Historic England only received
on the day of submission.

Context

Bradleys Both Development Plan up to 2032 ("the Plan") - land to east of College Rd Bradley BD20 9DT {SHLAA No BR011} ("the Land").

Bradley Parish Council (BPC) has been working for some years on the preparation of a Neighbourhood Development Plan (NDP). In March 2016 an initial draft was published, following consultation with the Bradley community, which designated the land to the east of College Road (identified as BR011) as Green Space. The final draft of the NDP was submitted to Craven District Council (CDC) on 18th October 2022 but contains a key alteration 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 Land. In fact the Land has received neither an ENV1 "Local Green Space" or an ENV3 "Conserving the Landscape" designation and is effectively "white" land. It is the only substantial piece of land in the entire village which has not received a designation of any description, despite numerous reasons why its current state needs to be preserved. It has been suggested that CDC told BPC that too much land in the village had been designated as Green Space and some land needed to be removed from such designation. We believe the changes to the Green Space designation was not clearly publicised and the question of whether too much land can ever be designated 'green' when it carries such historic and important value remains unanswered. BPC appears to be unable to explain why the Land was chosen in preference to any other piece of designated Green Space in the village

Reasons for Objection

We believe that the decision not to designate the Land either ENV1 or ENV3 is wrong and would draw your attention to the following:

1. Pre Submission Consultation

The Pre Submission Consultation Draft: March 2016 prepared by BPC designated the Land (along with BR0 08) as "Green Space" The Landscape Value was described as being "Open Land critical to maintain and retain the Green balance of this section of the Conservation area". It is not clear what has changed since this consultation document was published.

2. Low Bradley Conservation Area

In the Low Bradley Conservation Area Appraisal August 2016 the Land is identified as an open space which makes a strong contribution to the character and appearance of the Conservation Area. The Conservation area exists to manage and protect the special architectural and historic interest of a place and we believe allowing development on this site would be directly contrary to the conservation areas objectives.

3. CDC Site Allocations Methodology

In the CDC Site Allocations Methodology the Land was identified as making "a strong contribution to Bradley Conservation Area" and warned that development of the Land "would affect the setting of College House (Listed Grade II)".

4. Planning History

Under CDC's Site Visit and Desktop Appraisal it was incorrectly stated that there was no Planning History for the Land (this error was pointed out to both CDC and BPC in August 2016). In fact, a previous application for planning permission for 3 houses on the Land was rejected on appeal in 1991. A statement by Craven DC Planning Authority made at that time stated that "the appeal site was considered to have an important function in creating a spatial foreground to the principal elevation of College Farmhouse which is Grade II listed. The appeal site is also located within Bradley Conservation Area, and it is considered that the site also plays an important part in providing a visual break between the otherwise continuous development along the eastern side of College Rd. It is considered that the development of the site would not preserve or enhance the character of the Conservation Area in that part of Bradley Village". Those comments are as relevant now as they were in 1991. In addition the Council has a statutory duty under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay "special attention" to the "desirability of preserving or enhancing the character or appearance of its Conservation Areas. In addition, the Act requires that "special regard" be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic which they possess. We believe that in order to fulfil these obligations the Land must be designated Green Land.

5. The Neighbourhood Plan

In the Plan, BPC states that the NDP should include the following key objectives:

- *"To respect and preserve Bradley's open spaces, historic features and buildings, local heritage sites and recreational facilities".*
- *"To maintain and enhance the character of the village".*
- *"To minimize the impact of development on surrounding countryside and landscapes".*

The Land is situated within the oldest part of the village and College Rd contains a number of listed buildings along its length. The Land abuts College House and College Cottage which are both Grade II Listed. The settings of these particular Listed Buildings must be considered when assessing the designation of the Land. Setting is defined in the National Planning Policy Framework as "the surroundings in which a heritage site is experienced. Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral". Furthermore The Land is the only open space along the entire length of College Rd. By removing the Green Space designation not only has BPC's failed its own key objectives but also leaves the setting of College House and College Cottage open to being severely and adversely impacted.

It is interesting that in Appendix 4 – Site Brief for land in Skipton Road Bradley – it has been specifically noted "that there are no listed buildings within or adjoining the site" Clearly CDC and/or BPC note the significance of listed buildings when assessing the suitability of a site. However, the fact that two listed buildings adjoin the Land has been overlooked or ignored when deciding to withdraw Green Space status from the Land.

6. Graveyard Views

The Land also permits highly significant views of the village graveyard, being the only place in the village with public access from where the graveyard is visible, and from the graveyard this

open land permits significant and pleasing views over open fields to that part of the Conservation Area providing a real sense of the historic nature of this part of the village.

7. Local Green Space Assessment

At some point between March 2016 (when the Pre submission Consultation Draft was published) and October 2022 (when the Plan was published) the Green Space designation of the Land was removed. It has been suggested that CDC told BPC that too much land in the village had been designated as Green Space and some land needed to be removed from such designation. BPC appears to be unable to explain why the Land was chosen in preference to any other piece of designated Green Land in the village. It seems that CDC and/or BPC have ignored the Local Green Spaces Assessment contained in Appendix 4 of the Pre-submission Consultation Draft which stated that, in respect of the Land, it was "critical to maintain and retain the Green balance of this section of the Conservation area" and recommended that the Land be designated as Green Space.

8. DEFRA Farmland

The Land is Grade 3 (DEFRA) farmland which maintains significant agricultural value.

9. Historical Context

This is the most historic part of Low Bradley village. Bradley is an Anglo Saxon name and is mentioned in the Domesday book. Low Bradley grew up around "College" and here the farm on the site of College House and College Cottage paid rent to Bolton Priory as far back as 1290. The site and the "land" require preserving and protecting. Green Space designation is essential.

10. Existing Density of Development

The PC acknowledges that the conservation area already has relatively high density housing and describes it as a relatively congested built up area. Previous planning applications, refused by CDC but taken to appeal by the applicants suggest that the risk of further planning applications is strong and makes this site particularly vulnerable.

In conclusion Bradley Parish Council, Craven District Council and the previous planning history all identify the Land as of historical and landscape importance and an essential aspect of the conservation area in this part of the village. It is therefore essential that to protect the Land for generations to come the correct designation of Green Space is allocated to the Land and that the NDP should be amended to this effect.

We therefore request that this amendment is made to the NDP and that the correct designation of Green Space is ascribed to the Land.

Appendix 4

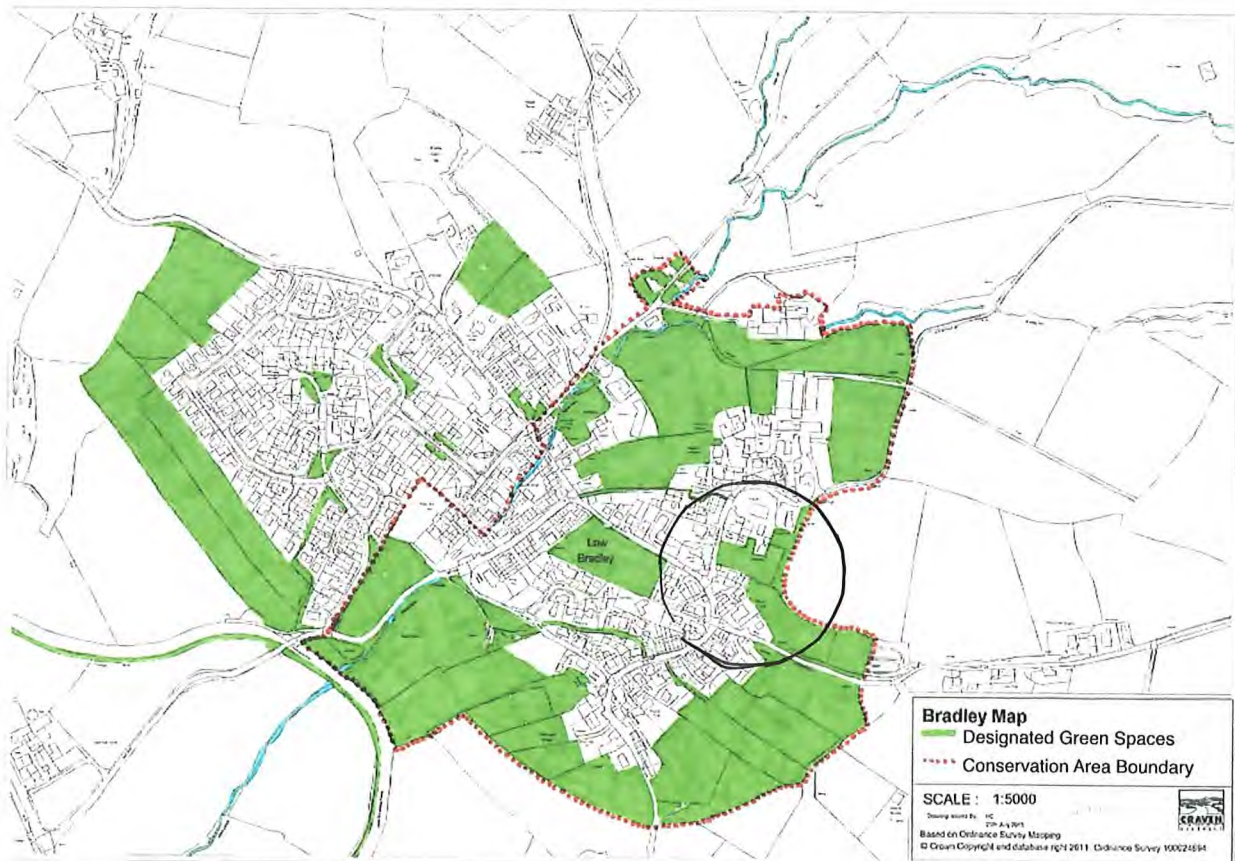
Bradleys Both Local Green Spaces Assessment

Significance and Rationale for Designation

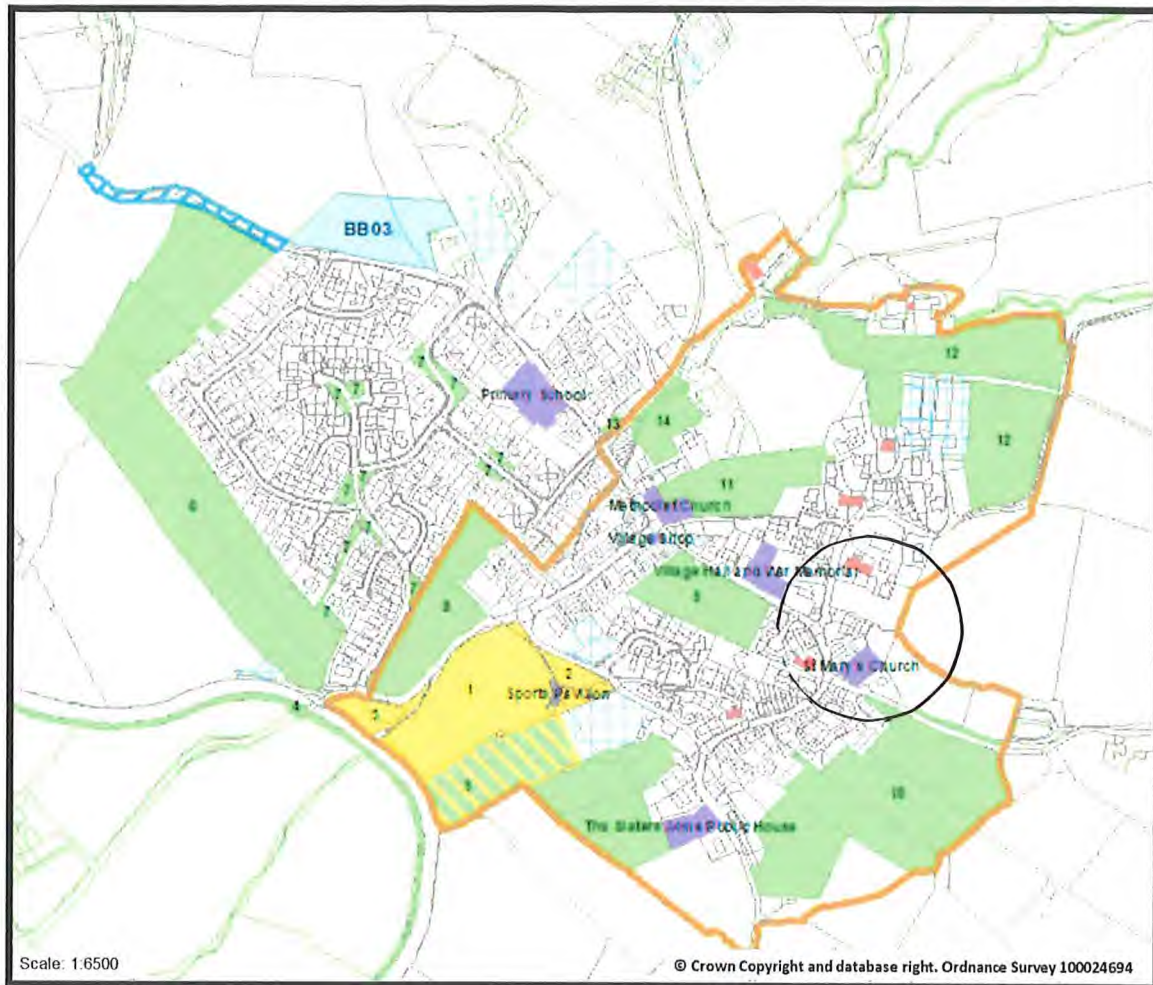
In 2015 the parish of Bradleys Both carried out a green space assessment covering the whole of the parish as part of the neighbourhood development plan. The framework for the recommendations was predetermined by criteria set out in advance by a national standard approach.

In the mid 1970's a conservation area was enacted covering the old historic village of Lower Bradley. Part of the conservation approach was to include areas of green space to maintain the character of the village and ensure the maintenance of the balance between buildings and the natural environment, understanding that harmony with the landscape was an important conservation factor. Since that time there has been a significant reduction to these green spaces by dwelling development much of which lacked harmony and sensitivity to the character of the village.

This report has been made using the assessment framework. This assessment is critical to the conservation and land management of the parish for a sustainable future respecting the rights of land owners and farmers, the wider needs of parishioners and the maintenance of a beautiful land.



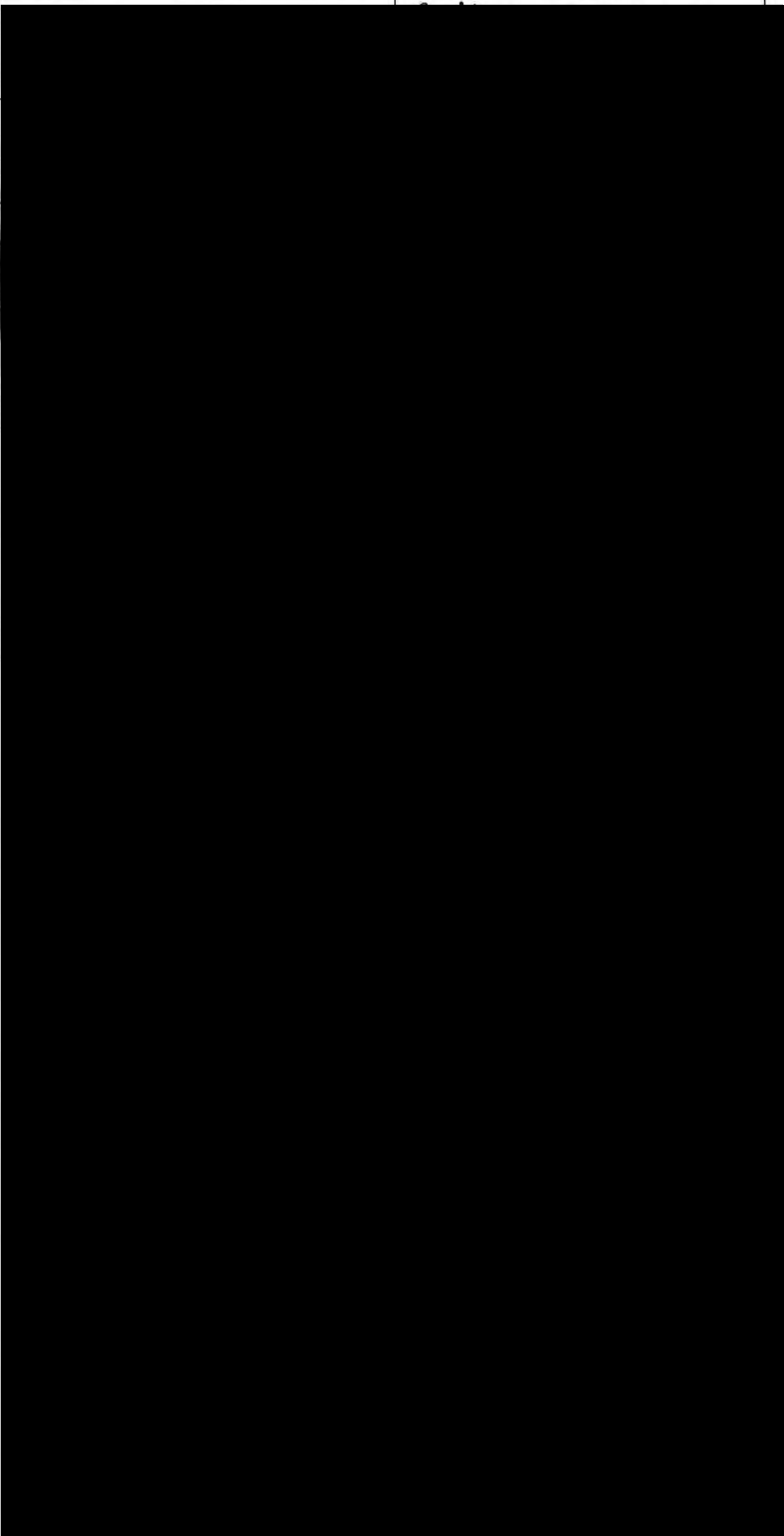
Village Inset Map



KEY

	ENV1: Local Green Space
	ENV2: Green Infrastructure Links—Canal Link
	ENV2: Green Infrastructure Links—Gill Links
	ENV3: Conserving the Landscape
	ENV8: Protecting Conservation and Heritage Sites—Listed Buildings
	ENV8: Protecting Conservation and Heritage Sites—Conservation Area
	HOU1: Identification of land for housing in Bradley from 2012 to 2032—Housing Allocation
	HOU1: Identification of land for housing in Bradley from 2012 to 2032—Committed Housing Site
	HT2: New Development Infrastructure (Skipton Road Pedestrian Improvement Area)
	CFS1: Bradley's Community Facilities
	CFS2: Creation of new and the extension of existing Sporting and Recreation Facilities—Existing Sporting and Recreation Facility
	CFS2: Creation of new and the extension of existing Sporting and Recreation Facilities—Extension to existing Sporting and Recreation Facility

Signatories

Name	Address	
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		26.1.23

[illegible]



Historic England

YORKSHIRE



Spatial Planning Team,
Craven District Council,
1 Belle Vue Square,
Broughton Road,
Skipton,
North Yorkshire,
BD23 1FJ

Our ref: PL00791913
Your ref:

Telephone 01904 601 879
Mobile 0755 719 0988

30th January 2023

To whom it may concern,

**Bradleys Both Neighbourhood Development Plan
Regulation 16 Submission Draft Consultation**

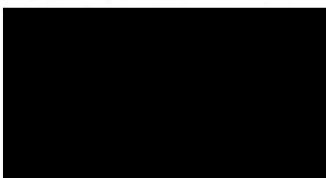
Following our letter of 16th January 2023, it has been drawn to our attention that an area of Local Green Space identified in the "Bradleys Both Parish Council Neighbourhood Development Plan 2016-2031" has been omitted from the Submission Draft "Bradleys Both Parish Council Neighbourhood Development Plan Up to 2032".

The area identified in "Bradleys Both Parish Council Neighbourhood Development Plan 2016-2031" Appendix 5 (attached) is BR011; the draft Low Bradley Conservation Area Appraisal August 2016 (which was co-funded by Historic England and Craven District Council) identifies this area as part of the landscape surrounding Low Bradley as making a "strong contribution" to the character and appearance of the Conservation Area.

Given that the appraisal is due for adoption by Craven District Council in late February or early March 2023 (according to the Craven District Council Conservation Areas webpage), 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.

We look forward to receiving acknowledgement of the above, in due course.

Yours sincerely



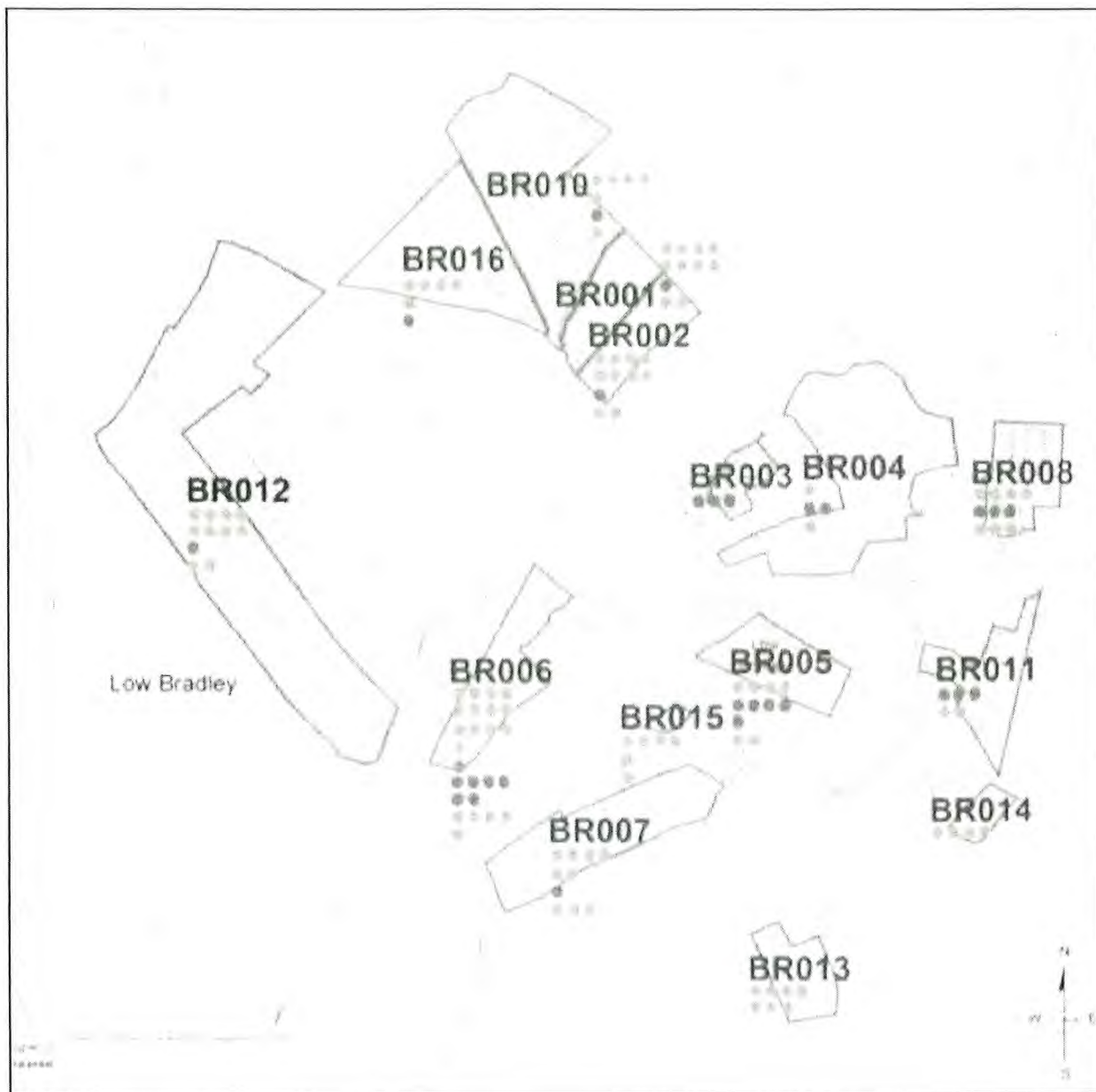
Historic Places Adviser

E-mail:



Appendix 5 Housing Engagement Summary Map

11



Key to Housing Engagement Summary Map

On the settlement maps, a coloured dot represents a preference expressed or a comment made by an individual with respect to a site.

- A preferred site for housing.
- A preferred site for employment.
- An objection to development of a site.
- A point of information regarding a site, which may be an issue, a query, a suggestion or an idea.