

Bradleys Both Neighbourhood Plan Review
Regulation 14 Consultation Statement

As part of the Regulation 14 consultation for the Bradleys Both Neighbourhood Plan review, residents, statutory consultees, and stakeholders were invited to comment on the proposed revisions to the Plan.

In particular, the consultation sought views on the proposed designation of the site at **College Road/Sweet Croft** as a **Local Green Space**.

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Summary of Responses

- A total of **28 responses** were received following the consultation which ran from 1st August - 12th September 2026.
 - **21 responses from local residents - Appendix 1**
Note: The landowner objected and we addressed this in the letter on page 9. There has been no further response.
 - **7 responses from statutory bodies - Appendix 2** some asked for changes to other parts of the Plan which were not to be considered in this consultation.

Consideration of concerns expressed in responses to the consultation.

- **Canal & River Trust comment**

The Canal & River Trust has requested that the existing designation of the towpath to the Leeds & Liverpool Canal be reconsidered, citing potential threats to the Trust's ability to manage the canal.

Response:

This comment is not relevant to the designation of Local Green Space within the Neighbourhood Plan. The Local Green Space designation does not affect ownership, access rights, or the Canal & River Trust's statutory responsibilities for the operation, maintenance, or management of the canal and towpath. As such, no change to the proposed Local Green Space designation is considered necessary in response to this comment.

- The landowner queries that the land is not in the Conservation Area Appraisal and is not open to the public.

Response:

An erratum to the adopted Conservation Area Appraisal is published on North Yorkshire Council's website. This erratum confirms that the proposed Local Green Space (LGS) immediately adjoining College Road was omitted from the original appraisal in error. The omission does not therefore indicate an assessment that the land is of lesser value or significance, but rather reflects a factual error which has since been formally corrected by the local planning authority.

In addition, Tables 1 and 2 of the proposed modified Neighbourhood Development Plan (NDP) clearly identify that the land in question is not accessible to the public. This point is therefore fully acknowledged and transparently recorded within the evidence base of the Plan. As previously stated, lack of public access does not preclude land from making an important contribution to local character, landscape setting, or the spatial form of the settlement, nor does it undermine its suitability for protection within the Neighbourhood Plan.

Taken together, the published erratum and the clarity provided within the modified NDP demonstrate that the proposed designation has been informed by accurate evidence and a balanced assessment of local circumstances.

A link to the Conservation Area Appraisal along with the erratum and Tables 1 and 2 of the NDP were sent. There has been no response to this.

Outcome

- All respondents expressed **support** for the proposed designation of the site at College Road/Sweet Croft as a Local Green Space.
- No objections were received, though the above concerns were considered and responded to.

Conclusion

The consultation has demonstrated **clear and unanimous support** for the inclusion of the College Road/Sweet Croft site as a Local Green Space in the Bradleys Both Neighbourhood Plan review. The designation will therefore be retained within the revised Plan moving forward to Regulation 16 consultation.

SEA/HRA Reports

A Strategic Environmental Assessment (SEA) Screening Report was undertaken on behalf of BBPC in October 2025. This considered the modified NDPs potential economic, social and environmental impacts. The draft modified NDP and screening report were then sent to the Statutory Environmental Bodies (Environment Agency, Natural England and Historic England) for comment and in accordance with Regulation 14 a period of 6 weeks was allowed. Whilst the Statutory Bodies have not provided any response to this matter BBPC now reserve the right to adopt a Screening Opinion and progress the modified NDP.

APPENDIX 1

RESIDENTS' RESPONSES

1. I live in Bradley and would be extremely happy with the land on college road and up to the graveyard maintaining as green belt. With this preventing it in future to be built on.
2. We wish to confirm that we are entirely in favour of the proposed modified NDP relating to Sweet Croft and land to the east of College Road, Bradley.
3. May I express my support for the proposed modification to the NDP by the inclusion of the area to the east of College Rd as an additional green space. This area is an important contribution to the character of the village and should have been included in the original plan.
4. May I express my wholehearted support for the proposed modification to the NDP by the inclusion of the area to the east of College Road as an additional green space. This area should always have been included in the plan and makes a contribution to the character of the village.
5. We email to support the proposal to modify the NDP by designating as an additional Local Green Space the area to the east of College Road extending up to and including Sweet Croft. It would be tragic if this area were to be spoiled by any development that might change the character of this part of our village.
6. We are in full agreement of the proposed modification for the additional Local Green Space (LGS) to the east of College Road and extending up to and including the recent extension to the burial ground, Sweet Croft. It will be a great benefit for the residents of the village and will maintain the character/history of the village.
7. I am writing to confirm my support for the proposed modification only to the Bradley's Both Neighbourhood Plan, as set out in the July 2025 reviewed draft. The modification strengthens the Plan's ability to protect valued local spaces and ensure that future development is sensitive to Bradley's unique character. I believe it reflects community priorities and provides a fair balance between conservation and appropriate growth. I therefore fully support the proposed modification and look forward to seeing the Neighbourhood Plan adopted.
8. The residents of Primrose Hill, Wilholme & Pinfold, would like to have noted that they strongly agree with the proposals made relating to area 15 on the local green space policies map.
9. We would like to register that we are in favour of the modification of the Neighbourhood Development Plan for Bradley to include the additional Local Green Space to the East of College Road and extending to the burial ground.

10. We are writing to confirm that we are both supportive of the modifications proposed by the Parish Council to the NDP regarding Sweet Croft. We agree that the whole area described in the proposal should remain a Green Space.
11. We support the proposed modification to the Bradley's Both Neighbourhood Development Plan by including an additional Local Green Space to the East of College Road and extending up to and including the recent extension to the burial ground, Sweet Croft.
12. We fully support Bradley Parish Council's proposal to modify the Neighbourhood Development Plan Up to 2032 so as to include additional Local Green Space to the East of College Rd and extending up to and including the recent extension to the burial ground, Sweet Croft. We ask that this email be forwarded to North Yorkshire Council and the Examiner as part of the supporting documentation.

With particular regard to the land in College Rd ("the Land") we have always believed that the decision to remove LGS from the Land was wrong and flew in the face of all the evidence which was produced at that time which supported the retention of LGS status and we see the current application to modify the Plan, in part as a correction of that error. We would draw the Examiner's attention to the following:

 1. The Land was identified as BRO011 in the draft NDP 2016 and was afforded Local Green Space. However that designation had been removed in the final draft. Representations against that decision were made by local residents. This decision was drawn to the attention of Historic England who wrote to Craven District Council to point out that the draft NDP 2016 identified this area as part of the landscape surrounding Low Bradley as making a "strong contribution" to the character and appearance of the Conservation Area and consequently Historic England considered it INAPPROPRIATE " for this area of land to be excluded from the Local Green Space Policies Map" and stated that " 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".
 2. In its Reg 16 response Bradley Parish Council stated that it had been "unable to locate specific records to show why these sites were removed as possible LGS designations and are so not able to determine if this was a deliberate decision to exclude the land or whether it was a drafting/mapping error" After the absence of records was queried with the Parish Council it transpired that notes of a meeting held on 26th July 2018 were available although these notes contained no explanation as to the rationale behind the decision to remove the LGS status. We understand that Craven District Council may have indicated that the draft NDP created a "ring of green space" around the village which could be challenged by an examiner. This does not explain why LGS status was removed as the Land lies in the heart of the historic part of the village not on the outskirts. With such a potentially contentious issue we feel that the pros/cons of retaining/removing LGS status from the Land should have been fully

documented. Furthermore the Parish Council acknowledged the concerns and comments made by local residents and Historic England regarding removal of LGS status and said that it welcomed the examiner's independent assessment of this and will fully accept the conclusions of the examination". Of course, as the Examiner explained in para 98 of his Report, his role was not to produce an alternative plan or to designate the Land as a LGS but merely satisfy himself that the plan met the Basic Conditions so there was never any possibility that the Examiner could restore the LGS status when preparing his Report.

We requested the Parish Council to forward a copy of the notes of the July 2018 meeting to the Examiner (as he had not previously seen them) and for the Examiner to confirm whether or not access to those notes at the time of his examination of the draft NDP would have resulted in his final Report reaching a different conclusion. In addition we also asked that the Examiner confirm that he was comfortable with the fact that the removal of NDP status might have been due to a "drafting/mapping" error and why, notwithstanding that possibility, he felt able to "sign off" the draft NDP without any comment or expression of concern. This request was rejected on the basis that the examination was closed and it was not believed that any further representations to the Examiner, even if acknowledged at that stage, would have any effect.

3. At the same time the Bradley Conservation Area Appraisal was published and, in this, the Land had lost its Strong Contribution designation. Representations were made to Craven District Council who referred the matter to its Consultants Alan Baxter Ltd who subsequently agreed that a mistake had been made and the Land should not have lost its Strong Contribution designation. This error has now been corrected by way of an Erratum. This is relevant in that the Independent Examiner was not aware of this mistake at the time of his examination and in fact specifically stated in his Report that " I have noted the adopted Conservation Area Appraisal(2023) does not identify the part of land in question closest to College Road and South and South East of College House as making, either some contribution, or a strong contribution to the character and appearance of the Conservation Area" So, to that extent, the Examiner relied upon incorrect information contained in the Conservation Area Appraisal when preparing his Report. Craven District Council had stated during the NDP process that " the recent Bradley Conservation Area Appraisal is an important piece of evidence relating to Policy ENV8 "(Protecting Conservation Areas). It cannot be right that the Examiner had sight of, and specifically referred to the Conservation Area Appraisal which contained an error relating to the status of the Land during the course of preparing his Report.
4. Throughout the process of preparing the NDP both Craven District Council and Bradley Parish Council maintained that there was no planning history relating to the Land. This was incorrect and the mistake had been pointed out to both Councils as far back as May 2016. Planning Permission was refused on appeal back in 1991 (Decision No 5/11/222). Craven District Council noted 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 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 Road. 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. It was also remarked that "adjustment of the existing boundary wall which runs along the western boundary of the site.....would, along with the access to the site, alter the character of the site frontage in a way which not maintain or enhance the character of the Conservation Area surrounding the appeal site"

5. The Land appears in the SHELA Assessment dated 6 October 2022, Schedule of Discounted Sites.
6. At the outset of the NDP process Bradley Parish Council identified various high level objectives which would "inform the policies within the neighbourhood plan" including "to respect and preserve Bradley's open spaces ,historic features and buildings, local heritage sites and recreational facilities" (Policy E1). The Land is known locally as The Pinfold ie an enclosure which historically was used to impound stray animals, so to that extent the Land has historical significance to Bradley.
7. For the reasons set out above we believe that the original decision to remove LGS status for the Land was flawed.
8. We support the Parish Council's application to modify the adopted Bradleys Both Neighbourhood Plan up to 2032 and urge North Yorkshire Council and the Examiner to approve the application.

Our Reference: LB/DL129

DAVID HILL

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Bradleys Both Parish Council
Email Address:
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Sent via Email only

27 February 2025

Dear Sirs

Proposed modification of the Bradleys Both Neighbourhood Development Plan

I am writing to you on behalf of ██████████ regarding the above matter. They would like to thank you for your letter dated 10 February 2025 giving them the opportunity to respond to your new draft Neighbourhood Development Plan.

The justification given for the inclusion of my clients' land within a new Local Green Space, is that alterations have been made to the Low Bradley Conservation Area Appraisal, between the draft and the adopted version.

The new draft Neighbourhood Development Plan, states that my clients' land makes a strong contribution to the conservation area as part of OP3. An extract from the map within this adopted Low Bradley Conservation Area Appraisal is included within Appendix A.

A large section of my clients' land is not included within OP3 and is instead shown as white land. It should be noted that this white land has been downgraded in the adopted Conservation Area Appraisal, from the draft version of the document.

It therefore cannot be correct that the updated appraisal has led to the new Local Green Space designation, as the adopted appraisal finds this white land to be less significant and less worthy of protection. An extract from the draft Low Bradley Conservation Area Appraisal is included in Appendix B.

In the adopted Low Bradley Conservation Area Appraisal, Bradley Hall and Grounds are identified as an historic site, and part of this identified site is within the above-mentioned white land. However, this does not require the site to remain open but would require an archaeological report to be produced as part of any future planning application. It does not justify the site being allocated as Local Green Space.

Further to this, the Low Bradley Conservation Area Appraisal makes recommendations on how the conservation area should be managed going forward. No recommendation is made



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Our Reference: LB/DL129

for the allocation of land as Local Green Space and so using the conservation area appraisal as justification for this is incorrect.

There is no justification for the creation of an additional Local Green Space as a result of the updated Low Bradley Conservation Area Appraisal. There is certainly no justification for the inclusion of the white land within the Local Green Space.

Rather than trying to allocate their land as Local Green Space, my clients feel the Parish Council should instead look to follow the recommendations in the adopted Low Bradley Conservation Area Appraisal to protect against inappropriate development.

My clients have no objection to the creation of a Local Green Space for the land within this proposed allocation that does have public access and is managed by the Bradley Environmental Group.

My clients' land is not open to the public and is not managed by a community group, and it is felt by my clients that your draft document gives the impression that access is available on their land, which is not something they would want to be put forward in a public document, as it will encourage trespass of their land.

I trust that this is in order but if you have any queries then please do not hesitate to contact me.

Yours faithfully

BRADLEYS BOTH PARISH COUNCIL

[REDACTED]

20th March 2025

Ref LB/DL129

Dear Sirs

Proposed modification of the Bradleys Both Neighbourhood Development Plan

Thank you for your letter of 27 February 2025.

The Parish Council has asked me to respond to your letter thanking you for your clients' submissions which they have now considered.

They intend to proceed with the proposed modification. In that regard, you might wish to note that an erratum to the Conservation Area Appraisal can be found on the North Yorkshire Council website [Low Bradley Conservation Area appraisal adopted March 2023](#) which shows that the part of the proposed LGS immediately adjoining College Road was omitted in error from the area marked purple denoting land which makes a strong contribution to the conservation area. Further, as the interactive map attached to your letter demonstrates, that part of the proposed LGS is in close proximity to a historic site, College House.

The Parish Council has asked me to send you an amended version of tables 1 and 2 to the proposed modified NDP with various amendments which make it clearer, *inter alia*, that your clients' land is not accessible by the public.

Yours faithfully

[REDACTED]
Clerk to Bradleys Both Parish Council

Clerk of the Council:

[REDACTED]
Email: bradleysbothparishcouncil@gmail.com

APPENDIX 2

STATUTORY BODIES RESPONSES

Our Ref: 357-1-2025
Your Ref:
Date: 1 August 2025

Mags Smith
Bradleys Both
Parish Council



Dear Mags,

Proposal Local Green Space modification to the Bradleys Both Neighbourhood Development Plan under Regulation 14 Neighbourhood Planning (General) Regulations 2012

Location East of College Road and extending up to and including Sweet Croft

Thank you for consulting North Yorkshire Police on the proposed modification to the local green space of the Neighbourhood Development Plan for Bradleys Both.

North Yorkshire Police has no comment to make on the modification to include land east of College Road extending up to and including Sweet Croft.

If I can be of further assistance, do not hesitate to contact me.

Yours sincerely,





By email to
bradleysbothparishcouncil@gmail.com

Our Ref CRTR-POL-2025-44830

Wednesday 13 August 2025

Bradleys Both Neighbourhood Plan Regulation 14 Consultation – Revised Local Green Space Designations in the Bradleys Both Neighbourhood Plan

Thank you for your consultation on the above Regulation 14 Consultation in relation to the Revised Local Green Space Designation proposed for the Bradleys Both Neighbourhood Plan, comprising of the proposed addition of a Local Green Space designation to land to the east of College Road.

The Canal & River Trust own and manage the Leeds & Liverpool Canal to the west of the Parish. We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

Due to the distance of the canal from the proposed Revised Local Green Space designation, we do not wish to make comment on the proposed designation of "Sweet Croft and land to the east of College Road" as Local Green Space.

We wish to highlight, however, that the Trust would request that the existing designation of the towpath to the Leeds & Liverpool Canal is reconsidered should this be possible, however, as this does pose threats to the ability of the Trust to properly manage the canal.

We are confident that the designation of the Canal Towpath as Local Green Space is based on a desire to protect this valued asset and we appreciate this. We do, however, have serious concerns about the possible unintended consequences of its designation as local green space.

Local Green Spaces are designated in accordance with paragraphs 106-108 of the National Planning Policy Framework. The National Planning Policy Framework states that policies for managing development within Local Green Spaces should be consistent with those for Green Belts (paragraph 108).

The Local Green Space designation could threaten the ability of the Trust to undertake works on land in its ownership necessary for public benefit and to support active and thriving waterways, for example, to gain

Canal & River Trust Spatial Planning Team

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Patron: King Charles III. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1145792. Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW

consent for improvements to existing facilities on site (for example, for the use of boaters). This would also be contrary to the wider aims of saved policy EC4 'Tourism' from the Craven Area Local Plan, where part e) seeks to promote easy access to and improvements to the canal towpath. Restrictions could also mean that opportunities to support active use along the Leeds & Liverpool Canal are lost, contrary to the aims of this policy.

Whilst we are unclear as to the rationale for the designation of Trust land as Local Green Space, we would wish to highlight that the Canal & River Trust is the statutory undertaker with responsibility for regulating navigation on the adjacent waterway. Its primary duty, as set out in S10 of the Transport Act 1962 is to 'provide to such an extent as they may feel expedient services and facilities on the inland waterways owned or managed by them'. We therefore benefit from permitted development rights under the Town and Country Planning (General Permitted Development) Order 1995. This is unchanged by the designation. As referred to above however, a Local Green Space designation may restrict proposals which are outside of the scope of our permitted development rights but are nonetheless in accordance with our charitable aims of providing wider public benefit.

In addition to the above concerns, we also wish to highlight that for the following reasons, the Local Green Space designation is likely to not be necessary.

Paragraph 11 from the National Planning Practice Guidance (reference ID 37-011-20140306) infers that consideration should be given to whether there is any additional local benefit gained from designating land as Local Green Space if already protected by another designation.

The canal towpath is situated within Open Countryside which already provides a high degree of protection from development. Policy ENV1 from the adopted Craven Local Plan seeks to ensure that development in such areas respects, safeguard, and wherever possible, restores or enhances the landscape character of the area.

The canal towpath is therefore already protected from a wide degree of inappropriate development, and the **designation of this land as a Local Green Space may not be strictly necessary** to ensure the retention of the Green Space in the short or long term.

We appreciate that the above comments about the existing Local Green Space designation is not part of the existing consultation. However, we hope our comments are taken on board should the opportunity arise to carry out further revisions to the Plan.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,



<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust Spatial Planning Team

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For the attention of: Bradleys Both Parish Council

[By email: bradleysbothparishcouncil@gmail.com]

3rd September 2025

Dear Bradleys Both Parish Council

Re: Modification to the Bradleys Both Neighbourhood Development Plan Local Green Space designations

Thank you for your notification of the 31st July 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the Bradleys Both Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including; mine entries, and probable coal workings. These features may pose a potential risk to surface stability and public safety.

We note that this consultation relates to a modification to the Neighbourhood Plan to include additional green space.

I can confirm that the Planning team at the Coal Authority have no specific comments to make on the modifications proposed.

Yours faithfully



Making a **better future** for people
and the environment **in mining areas**

Date: 11th September 2025
Our ref: 521731
Your ref: Bradleys Both Neighbourhood Plan



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Bradleys Both Parish Council

BY EMAIL ONLY
bradleysbothparishcouncil@gmail.com

Dear Sir/Madam

Bradleys Both Neighbourhood Plan - Pre-submission Regulation 14 - Revised Local Green Space Designations

Thank you for your consultation on the above dated 31 July 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully


Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>



Parish Clerk

Bradleys Both Parish Council

bradleysbothparishcouncil@gmail.com

Our ref: PL00791913

Your ref:

Telephone 01904 601879

07502 737925

12th September 2025

Dear Bradleys Both Parish Council

Neighbourhood Planning (General) Regulations 2012: Regulation 14

Bradleys Both Revised Neighbourhood Plan: July 2025

Thank you for consulting Historic England on the revised draft of the above neighbourhood plan. Historic England is a public organisation that protects and brings new life to the heritage that matters to us all, so it lives on and is loved for longer. We are pleased to offer our comments.

Historic England is keen to ensure protection of the historic environment is appropriately taken into account in neighbourhood plans. Having reviewed the information provided in correspondence of July 2025, we do not consider there is a need for us to comment further, other than on the proposed inclusion of: Local Green Space (LGS) at Sweet Croft (site reference 15), into the plan.

Detailed Comment

We provided detailed comments upon the Pre-submission Draft of the Bradleys Both Neighbourhood Plan, in our letter of 6th May 2016.

We note that our advice has been considered, acted upon, and where appropriate, revisions have been made to the Draft Neighbourhood Plan.

We commented on the submission draft in 2023, replying on 16th January 2023 that we were satisfied our previous comments had been taken in to account, but wrote again on 30 January 2023, after it had been brought to our attention that designation of the piece of land in question: Local Green Space (LGS) at Sweet Croft (site reference 15) had been omitted from the submitted plan. We clarified then that we would support its designation as LGS due in part

Historic England, 37 Tanner Row, York YO1 6WP
Telephone: 01904 601948 | historicengland.org.uk

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to its making a “strong contribution” to the character and appearance of the Conservation Area.

I can confirm this is still the case and support its inclusion in the revised and modified version of the adopted Neighbourhood plan – July 2025.

General comments

We publish *Neighbourhood Planning & the Historic Environment* (HE Advice Note 11, Second Edition) containing advice on why and how to address the historic environment in neighbourhood plans. We also publish advice and case studies on our website.

The NPPF says neighbourhood plans have the power to develop a shared vision for their area, to shape, direct and help to deliver sustainable development, including detailed policies on conserving and enhancing the historic environment and on design (NPPF para 29-30). The national Planning Practice Guidance (PPG) is clear that, where relevant, neighbourhood plans should include enough information about heritage to guide planning decisions and to put strategic heritage policies into action at a neighbourhood scale.

It is therefore important that your plan identifies heritage assets in the area (including the conservation area, not just positive buildings within it), and includes a positive strategy to safeguard those elements that contribute to their significance. For example, policies might address the following:

- Maximising the wider social, cultural, economic and environmental benefits flowing from heritage, eg. regeneration, tourism, learning, leisure, wellbeing and enjoyment.
- Locating new development to protect heritage assets and their settings.
- Giving detail on the expected design characteristics of new development.
- Offering solutions to heritage assets that are at risk from their condition or vacancy, or are vulnerable to becoming so during the life of the plan, including assets not found on the national Heritage At Risk Register.
- Considering how heritage assets can be enhanced.

Your plan should be based on proportionate, robust evidence. For heritage, this might include a characterisation study, historic area assessment or archaeological appraisal, a summary historical narrative.

You should consider whether or not the plan would be likely to have significant environmental effects and thus require Strategic Environmental Assessment (SEA). This is established by following the Environmental Assessment of Plans & Programmes Regulations 2004, which require you, as neighbourhood plan qualifying body, to consult us on the matter in the form of a

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Screening Opinion. The local planning authority can advise on this, and we publish HE Advice Note 8, *Sustainability Appraisal and Strategic Environmental Assessment* to support this process.

Thank you once again for the opportunity to comment. I hope our comments will be useful. Please contact me should you require any clarification.

Yours sincerely



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Bradleys Parish Council

Email to the Clerk Bradleys Both Parish
Councils
bradleysbothparishcouncil@gmail.com

Our ref: NYC/ Craven/ Bradley NDP
Your ref: Reg 18 NDP

Date: 22 September 2025

Dear Parish Councils

REGULATION 14 CONSULTATION ON PROPOSED REVISIONS TO THE LOCAL GREEN SPACE DESIGNATIONS WITHIN THE BRADLEYS BOTH NEIGHBOURHOOD PLAN

Thank you for consulting the Environment Agency regarding the above revisions to the Neighbourhood Development Plan and also agreeing by email for an extension to reply on this date.

We have reviewed the information submitted and we wish to make the following comments:

Revisions to the Bradleys Neighbourhood Development Plan (NDP)

We have **no objection** to the Regulation 14 of the NDP and we are particularly pleased to see the maintained protection of the environment, an emphasis placed on enhancing green spaces and a reference to flood risk.

The Environment Agency will present below and expand on what we said in our previous consultation response. These comments seek to provide progressive remarks that underline recent updates and highlight important areas that you may wish to consider to strengthen your NDP.

Climate Change

We welcome the initial reference to climate change as you explain the role in planning policy.

Environment Agency
Lateral 8 City Walk, LEEDS, LS11 9AT.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

We strongly recommend that additional and greater weight is applied to climate change in all development plan documents such as NDPs. Climate change is an overarching challenge that will affect the natural and built environments.

- 1) North Yorkshire Council has declared a climate emergency. All NDPs should underline this position and present what are will be the main responses. This should frame and influence all aspirations in your NDP.
- 2) There must be an emphasis on shared responsibility to address climate change adaptation and deliver suitable mitigation – this should apply to residents, businesses, organisations and the council.

Flood Risk

We acknowledge and welcome the reference to flood risk. We would strongly recommend that the NDP considers amending to highlight that flood risk can be both fluvial (river/ watercourse) and pluvial (surface water).

On page 17 under (ii) Evidence, we note reference made to the Flood Map for Planning (FMfP) (as of 2021). We would like to take this opportunity to comment that the FMfP was recently updated in March 2025 and there have been significant changes to all flood zones in more localised areas.

Any reference to flood risk should reflect for both a need of avoidance AND mitigation measures. The use of OR is strongly discouraged as this could give an inappropriate instruction to developers.

Green Infrastructure

We welcome and continue to support the desired approach for the natural environment and particularly enhancing green space.

The Environment Agency advocate for an emphasis on specific policies and text to support for the protection and enhancement of the water environment, water habitats and aquatic species. Unintentionally, proposals for green infrastructure can focus on elements that do not comprise water or its resources.

I hope this formal reply is clear and highlights where further improvements could be made. Please do not hesitate to contact me if you would like clarification or further details.

Yours sincerely

██████████
Planning Specialist

██
Direct team email: sp-yorkshire@environment-agency.gov.uk

End



Policy and Place
North Yorkshire Council
County Hall
Racecourse Lane
Northallerton
DL7 8AD
Tel: 0300 131 2 131
Email:

Sent to Chairman of Bradleys Both
Parish Council:
bradleysbothparishcouncil@gmail.com



Date: 12 September 2025

Dear Bradley Parish Council

**Review of Bradleys Both Neighbourhood Development Plan - Regulation 14 consultation
North Yorkshire Council representations**

Thank you for inviting North Yorkshire Council to provide feedback on the Regulation 14 Pre-Submission draft of the Review of the Bradleys Both Neighbourhood Development Plan (NDP).

Council officers have previously viewed a preliminary draft of the modified NDP in July 2025 and provided comments at that time. We have now considered the consultation documents and can confirm that we are satisfied the Parish Council has taken onboard those comments in preparing the Regulation 14 Pre-Submission draft of the Review of the NDP.

We are satisfied that the assessment of the additional Local Green Space (LGS) site at College Road, Bradley has been carried out in line with the methodology used for assessing such sites during the preparation of the adopted NDP, which council officers supported the parish council in preparing. This methodology is in line with the methodology used to assess LGS sites in the adopted Craven Local Plan, which in turn is in line with NPPF.

We note that the NDP has been updated to reflect the additional LGS site in all relevant sections, including the relevant policies map and these updates are shown in red. If the Parish Council require any help in preparing mapping for the submission version i.e., changing the colour of the red outline around the additional LGS site to black, for example, the Council is happy to assist with this.

We hope these comments will support the preparation of the Regulation 16 version of the NDP and help ensure the plan meet the basic conditions of paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.

If you have any queries about the above comments, please liaise with officers at North Yorkshire Council.

Yours sincerely

OFFICIAL