

MATTER 9 – HISTORIC ENVIRONMENT

Issue 1: Whether the two Plans provide a positive framework relating to the historic environment consistent with Paragraph 126 of the Framework? Whether the policies of the AAPs are consistent with the objectives of the Framework, and policy EN3 of the emerging CS?.

1 Introduction

1.1 Are the AAPs consistent with the advice in the NPPF?

1.1.1 NPPF Paragraph 126 makes it clear that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment. This requirement relates not simply to ensuring that the plan includes appropriate Policies for the protection of the heritage assets of the plan area, but also that the sites which it is putting forward for development will also deliver the Government’s objectives relating to the historic environment.

Bradford City Centre Area Action Plan

1.1.2 Apart from the areas to which we raised concerns in our representations on the Plan (and to which would be addressed by the Council’s proposed Modifications should they be incorporated into the final AAP), Historic England considers that the Submission Draft of the BCCAAP does set out an appropriate Policy framework for the management of rich heritage of the City Centre:-

- The Vision sets out a series of measures that should help to ensure that the City’s heritage assets have a sustainable future and that the distinctive character of this part of the District is retained and reinforced.
- The Objectives seek to encourage the reuse of the City’s architectural heritage and the promotion of high-quality new design
- The individual Policies for each of the proposed Allocations not only alerts potential developers about the need to have regard to any heritage assets in their vicinity but also sets out a series of design requirements which will help to ensure that the development of these sites takes place in a manner which will safeguard those elements which contribute to the significance of those assets.
- The Planning Policies that are set out in Section 3 will assist in the delivery of the conservation of the heritage assets of the City Centre. These include:-
 - encouraging the reuse of upper floors (Policy CL1, Criterion B);

- encouraging active frontages which will help to sustain the vitality and attractiveness of the area (Policy CL3);
- encouraging the expansion of existing and creation of new cultural and tourist facilities in the City Centre (Policy SL4);
- requiring development proposals to preserve and enhance the character, appearance and setting of the heritage assets of the AAP (Policy BF1, Criterion F);
- ensuring that any tall buildings respect and/or enhance the skyline, key views, vistas and landmarks and have a positive relationship with their surrounding context.

1.1.3 Taken as a whole, therefore, it is Historic England's view that the BCCAAP does provide a positive strategy for the conservation of the historic environment consistent with national policy guidance.

ShIPLEY and Canal Road Corridor Area Action Plan

1.1.4 Apart from a few minor textual changes to which we referred in our representations to the Plan (and to which the Council are proposing a series of Modifications) and Site Allocation BWQ1, Historic England considers that the Submission Draft of the AAP does set out an appropriate Policy framework for the management of this part of the District:-

- The Vision sets out a series of measures for improving the links between Shipley and Saltaire, Shipley Station and the Leeds and Liverpool Canal, improving the area as a key gateway to the World Heritage Site
- The Objectives seek to protect and enhance the World Heritage Site and improve the linkages between this area and Saltaire
- The individual Policies for each of the proposed Allocations not only alerts potential developers to the need to have regard to any heritage assets in their vicinity but also sets out a series of design requirements which will help to ensure that their development takes place in a manner which will safeguard (and, where appropriate enhance) those elements which contribute to the significance of those assets.
- The Planning Policies that are set out in Section 3 will assist in the delivery of the conservation of the heritage assets in and around the SCRCAAP. These include:-
 - the requirement that proposals should positively relate to and take advantage of their proximity to these waterways (Policy SCRC/NBE2, Criterion A).

- the requirement that development preserves or enhances the heritage assets in and adjacent to the AAP (Policy SCRC/NBE5);
- the requirement that the setting and key views of important heritage assets be preserved or enhanced especially those around the World Heritage Site (Policy SCRC/NBE6);

1.1.3 However, whilst the majority of proposed allocations and the overall Policy framework does provide the positive strategy for the conservation of the historic environment that is required by national policy guidance, the allocation of a site whose development, as proposed, would be likely to harm the setting of a Grade II* Listed Building does not satisfy the requirements of Paragraph NPPF Paragraph 126 nor is it likely to conserve these particular heritage assets in a manner appropriate to their significance (NPPF, Paragraph 17)

1.2 Are the AAPs consistent with Policy EN3 of the emerging Core Strategy?

Bradford City Centre Area Action Plan

1.2.1 The Submission Draft of the BCCAAP is entirely consistent with not only Policy EN3 of the Core Strategy but also the Sub-Area Policy for the City Centre that is set out in Policy BD1 Criterion E.5 (as amended). The AAP contains a series of Policies and proposals which seek to ensure that the delivery of the AAP is achieved in a manner which will help deliver these Core Strategy Policies together with the Core Strategy's Objective for the historic environment as set out in Objective 12.

Shipley and Canal Road Corridor Area Action Plan

1.2.2 With the exception of the housing site at Bolton Woods Quarry, the Submission Draft of the SCRCAAP is consistent with Policy EN3 of the Core Strategy. The AAP contains a series of Policies and proposals which seek to ensure that the delivery of the AAP is achieved in a manner which will help deliver the provisions of this Core Strategy Policy together with the Core Strategy's Objective for the historic environment as set out in Objective 12.

1.2.3 The work that was undertaken by the Council to evaluate the potential impact which the proposed allocations would have upon the World Heritage Site and the detailed development requirements which are included within the AAP as a

result of that work is entirely consistent with Criteria A and B of the Core Strategy Policy.

Q52. Is there duplication between the policies of the emerging CS, the individual site allocations of both AAPs, and the Framework in relation to the Historic Environment?

2.1 Historic England does not consider that there is any unnecessary duplication between the Policies of either AAP and the Core Strategy. Policy EN3 of the Core Strategy, whilst identifying the elements of Bradford's historic environment that are of especial importance to the distinct identity of the District, provides only very broad guidance as to how those considering applications should determine applications affecting Bradford's heritage assets. The Policies of this AAP provide the necessary detailed considerations which those proposing development will need to take into account in order to ensure that development within this part of the City and on each of the individual development sites is delivered in a manner which will deliver sustainable development in terms of the conservation of Bradford's heritage assets.

Q53. Are the levels of detail set out in individual site allocations relating to designated and non-designated heritage assets justified and based on evidence?

3.1 Historic England considers that the level of detail that is set out for each of the site allocations to be necessary if the development of these sites is to be delivered in a manner which will ensure that the elements which contribute to the significance of the various heritage assets in their vicinity are not harmed and that, where they can be achieved, any enhancements to these significances are delivered. This is especially the case for the sites in the SCRCAAP whose redevelopment offers potential to enhance one of the main approaches to the World Heritage Site.

3.2 A large proportion of the BCCAAP and the northern part of the SCRCAAP lie within Conservation Areas. The Council has produced some excellent and extremely comprehensive Assessments of these areas and the detailed elements which contribute to their special architectural or historic interest. These provide very good evidence of both the designated and non-designated heritage assets which contribute to their distinctive character and how that character might be

threatened through inappropriate or insensitive developments. It also identifies key views and vistas that contribute to the character of these areas.

- 3.3 In terms of that part of the SCRCAAP which lies within the Buffer Zone of the World Heritage Site, in 2005 Bradford MDC commissioned and published the “*Saltaire World Heritage Site Environmental Capacity Study*” to help guide the management of the site. As part of this work, the Study sought to evaluate the contribution which the surrounding landscape made to the significance of the World Heritage Site. The Council also undertook a *Heritage Assessment* of each of the proposed allocation sites within the Buffer Zone. This recommended a number of specific measures which were considered necessary to either safeguard or enhance the Outstanding Universal Value of Saltaire. These provide clear evidence that the level of detail is necessary and appropriate.

ShIPLEY and Canal Road Corridor Area Action Plan

Q54. What makes Policy NBE5 of the SCRCAAP locally distinctive?

- 4.1 Unlike Core Strategy Policy EN3, this Policy identifies the particular designated heritage assets to which Policy EN3 applies and, in its supporting text, directs those proposing developments to other Policy documents which are likely to be material considerations by the Council when determining the appropriateness of any development proposals. As a result, Policy NBE5 provides a more local context to the overarching Core Strategy Policy.

Q55(a). Have opportunities been sought within the setting of Saltaire World Heritage Site to enhance or better reveal its significance consistent with Paragraph 137 of the Framework?

- 5.1 The Vision for the SCRCAAP sets out an intention to improve this key gateway to the World Heritage Site. The *Heritage Assessment* (produced by the Council to evaluate the potential impact of the site allocations of the SCRCAAP upon the World Heritage Site) has identified a number of sites which offer clear potential for enhancing or better revealing the significance of this part of the Buffer Zone. Where this is the case, this potential has been referred to within the individual development requirements for those sites. Consequently, it is evident that the Plan has sought to identify opportunities to enhance or better reveal the significance of Saltaire’s setting in line with the requirements of the NPPF.

Q55(b) How does proposed amendment (DPM0025), to the wording of Principle no. 7, impact on the soundness of the plan with reference to national and local policy?

6.1 Whilst the proposed change makes little meaningful difference to the soundness of the Plan as a whole, it does, nevertheless, improve the clarity of this Principle and ensure that its wording more closely reflects the terminology used in NPPF Paragraph 138.