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Philip Robinson
Interim Chief Executive
City Hall
Bradford
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Your Ref:

Our Ref: W4705/539

Date: 21 May 2004

Dear Mr Robinson

REPLACEMENT UNITARY DEVELOPMENT PLAN FOR THE BRADFORD DISTRICT: INSPECTOR'S REPORT

Introductory Points

1. I was appointed by the First Secretary of State to hold a public inquiry into objections to the Revised Deposit Draft (RDDP) of the Replacement Unitary Development Plan for the Bradford District. I was assisted in this task by Inspectors Barbara Whitbread, John Gillis and Philip Asquith. We Inspectors also had the help of 2 Planning Officers from the Planning Inspectorate, Susannah Guest and Chris Ford, who provided support prior to and during the Round Table Sessions early in the Inquiry. I now submit my report containing my recommendations on the action which should be taken in respect of all the objections which the Council has asked me to consider.
2. The draft replacement plan progressed through 2 formal deposit periods. The second of these, concerning the RDDP, came to an end on 29 August 2002. I held a pre-inquiry meeting on 26 September 2002. The Council published a set of proposed changes in January 2003, following the start of the Inquiry. These attracted some objections, which I consider in my report, at the request of the Council. Two proposed changes were also advertised on 7 May 2003, but attracted no objections. Further changes were put forward during the Inquiry as part of the Council's evidence. These changes were not formally published. In my report I refer to them as suggested changes, to distinguish them from the published proposed changes.
3. I opened the Inquiry on 7 January 2003. The first part of the Inquiry was taken up by 6 Round Table Sessions, concerned with the strategy of the draft plan, meeting the housing requirement, phasing the release of housing land, housing density, employment, and the Green Belt. The Inquiry sat on a total of 66 days and closed on 25 September 2003.



4. The Council's final list of objections, as presented to me towards the end of the Inquiry, includes the following statistics:

Number of duly made objections	8056	
Objections to proposed changes		15
Total objections		8071
Less number of objections unconditionally withdrawn		1376
Total outstanding objections		6695

5. The number of objections heard at the Inquiry was 862, or about 13%. The remaining 5833 objections were dealt with by means of written representations. In reaching my conclusions and making recommendations I have given equal weight to all objections regardless of whether they were pursued at the Inquiry or in writing. Although I do not refer to them specifically in my report I have taken into account the 4128 supporting representations made.
6. A copy of this letter has been sent for information to the Government Office for Yorkshire and Humberside.

The Report

7. Considering first the strategy of the RDDP, I recommend modifications designed to reflect national and regional planning guidance more closely, and to achieve a more sustainable plan. A major effect of this would be to remove Silsden from the list of urban areas, where development should be concentrated. I also recommend the extension of the plan period, to 2016, in order to accord with the period covered by regional guidance, and to give more certainty that a 10 year housing supply would be identifiable on plan adoption.
8. Flowing from the strategy recommendations, I recommend the deletion of almost all of the housing and safeguarded land allocations in Silsden. Another major deletion should be the allocated housing site at Cote Lane/Allerton Lane, Allerton, Bradford. A variety of new urban housing allocations are recommended for inclusion in the plan, and these would help to replace the housing capacity lost by the deletions. I note that a full urban capacity study has not been carried out, however. Without one, it is very difficult to quantify the contribution which sustainable urban land will make to meeting the housing requirement. Consequently, I recommend that a full urban capacity study be carried out.
9. Although I support the housing density policies of the RDDP, I have suggested large scale revisions to the housing phasing policies. Furthermore, on the basis of the objections, I have been unable to find enough sustainable housing land allocations to meet the full phase 2 requirement, bearing in mind that phase 2 is recommended to last until 2016. I return to this point below.
10. As with housing, there are basic deficiencies in the data available to justify the quantum of employment land required. I identify where more data is necessary. I do not recommend substantial changes to the employment policies, but as a result of the strategy recommendations I do not support

the uncommitted employment allocations at Silsden. I do, however, say that additional allocations should be made at Keighley and Bradford. This would nearly balance the losses of allocations at Silsden and at Westgate Hill. In the latter case the Civil War battlefield designation should be retained, should be clarified by notation on the Proposals Map, and should prevail over the employment allocation in the RDDP. On the other hand, the employment site at West Bowling Golf Course is of strategic importance and should not be used in part for other purposes.

11. I turn now to the Green Belt, because of the significance of the modifications I am recommending. To begin with, I consider that the Green Belt should have a life of 10 years beyond that of the plan. As I recommend that the plan period should last until 2016, so I recommend that the Green Belt should be capable of lasting until 2026. That has profound implications for the extent of the Green Belt and for the amount and location of land to be safeguarded for housing development in the long term. A combination of factors exists which is sufficient to provide the exceptional circumstances for changing the boundaries of the Green Belt. The Council's review of the Green Belt has not resulted in a Green Belt which would last until 2026, or in a sufficiency of safeguarded land. A further review is needed to satisfy these objectives, and also to enable the full satisfaction of the phase 2 housing requirement, if that cannot be achieved by means of the urban capacity study plus allocations already made.
12. As for other land use topics, my recommendations would lead to a simplification of the shopping policies and to a clearer exposition in them of the sequential approach to sites for retail development. I make few recommendations which would lead to substantial modifications to policies affecting transport and movement, design, built heritage and the historic environment (except where some clarification is needed to the section on archaeology), community facilities, natural environment and the countryside, natural resources, and pollution, hazards and waste (but see below). However I should make it plain that I am able to support most of the proposed changes in these areas, subject to minor changes in some instances.
13. The RDDP chapter on open land in settlements is much affected by the publication of a new version of PPG17 not long before the Inquiry. The Council's proposed changes recognise this, and I am unable to go much further than the proposed changes for lack of evidence. Generally, PPG17 policy matters were not matters which were expounded at Inquiry sessions.
14. I have recommended that some types of site, which are the subject of land use policies or proposals, but which are not shown on the Proposals Map, should in fact be identified on the map. Examples include certain waste and minerals sites.
15. I recommend a modification which affects the layout of the RDDP. Detailed housing content should be included in Part Two of the plan rather than in Part One. The Housing Chapter in Part Two should explain the strategy for selecting housing allocations, as well as the statistics to back up the plan's proposals.

16. There is a general point regarding recommendations to make a new allocation. These recommendations bring with them a need to make a new entry in the written text of the plan and a new site delineation on the Proposals Map. The recommended deletion of an allocation means deletion of the relevant text and of the site from the Proposals Map.
17. Finally, I draw the Council's attention to the need for careful proof reading of the plan. The document is characterised by typing, grammatical and spelling errors which detract from its clarity.

Concluding Remarks

18. I close this letter with an expression of thanks to the Council and objectors for their courtesy, humour, and kind consideration during the Inquiry. I was pleased to be assisted once again by my Programme Officer, Bob Lancaster. He helped to get the Inquiry started within a relatively short time after the pre-inquiry meeting. He and his assistants, Paula Harrison and Christine Blowers, dealt in a pleasant and efficient manner with all those who called on their services.

Yours Sincerely

C Hughes
Inspector