

Local Plan for the Bradford District

Core Strategy DPD – Proposed Modifications

Addendum Report to the Core Strategy – Publication Draft (2014) Equality Impact Assessment

November 2015

Local Plan for the Bradford District

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1.0 INTRODUCTION

- 1.1 This report forms an addendum to the Bradford District Local Plan - Core Strategy Publication Draft Equality Impact Assessment (EqIA) (February, 2014) for the purposes of considering the equalities implications of the proposed modifications to the Core Strategy Publication Draft. These changes are the result of the Core Strategy Examination process.
- 1.2 This Equality Impact Assessment fulfils the requirements of the Public Sector Equality Duty which was introduced in 2011 which was introduced as part of the Equality Act 2010.

2.0 BACKGROUND

- 2.1 The Core Strategy Publication Draft (March 2014) was submitted to the Secretary of State on 12th December 2014 for Examination by an independent Planning Inspector.
- 2.2 The Examination hearing sessions into the Core Strategy took place in March 2015. During the Examination hearing sessions a number of proposed modifications to the Plan evolved through various discussions and further statements which were submitted by other parties and considered by the Council.
- 2.3 Following the hearing sessions the Council has:
- considered issues raised by the Inspector and participants at these sessions,
 - reviewed the implications of recent changes to national policy, with regard to Affordable Housing Guidance Revocation of Thresholds and the Definition of Gypsy and Travellers, and relevant High Court Judgements,
 - completed a Gypsy and Traveller Accommodation Assessment,
 - completed a Habitats Regulations Assessment Review.
- 2.4 As a result of the above, the Council has proposed modifications to the Core Strategy, in particular some of its policies to address the concerns and comments of interested parties and those of the Planning Inspector and updated evidence in order to address the issues of soundness..
- 2.5 Among the proposed modifications are those which relate to the role of particular settlements within the settlement hierarchy along with an amended housing distribution as a result of further evidence base work. Many of these changes reflect the initial proposals put forward at the Core Strategy Further Engagement Draft in

2011 which was itself the subject of an extensive Equality Impact Assessment. Therefore the outcomes of that assessment have been taken into consideration during the preparation of this report.

- 2.6 In summary, the main modifications to the Core Strategy include:
- Burley-in-Wharfedale and Menston have been re-classified as a Local Growth Centres in the settlement hierarchy.
 - The housing apportionment for the following settlements has increased: Burley-in-Wharfedale, Menston, Ilkley and Silsden.
 - The housing apportionment for the following settlements has been reduced: Regional City of Bradford, Baildon and Haworth.
 - The outcome of discussions and further work on the Habitats Regulations Assessment (HRA)
 - Several policies have been modified in light of recent Government changes to planning policy; these include Policies HO9 and HO11.
 - Policy HO13 has been modified to reflect and apply the outcomes of the Gypsy and Traveller Accommodation Assessment (2015).
- 2.7 The proposed modifications to the Core Strategy Publication Draft are required in order for the Plan to be considered 'sound' by the Planning Inspector. It is therefore necessary to consider whether these modifications would result in a difference to the relevance of each policy in terms of equalities.
- 2.8 As the Core Strategy has been the subject of an Equality Impact Assessment throughout the preparation and production of policies, this addendum report does not reassess the whole Core Strategy, but merely focuses on the proposed main and additional modifications in turn. Each proposed modification has been screened for any equality implications and, where relevant, a comment has been provided. This report should therefore be read in conjunction with the Core Strategy Publication Draft Equality Impact Assessment (2014) (Submission document SD/011 of the Core Strategy's examination library) in addition to the Further Engagement Draft Initial Equality Impact Assessment (2011).
- 2.9 This addendum report, which is published alongside the schedules which relate to the Proposed Main Modifications and Proposed Additional Modifications to the Core Strategy, provides a screening assessment of all proposed modifications to policies and supporting text within the Core Strategy. Further information about the screening assessment can be found in Section 3 of this report and in Appendix 1.

- 2.10 Those policies which have been considered through the screening process to have a potential disproportionate impact on equality groups are the subject of a separate, fuller, equality impact assessment in Section 4 of this report.
- 2.11 Section 4 provides a summary of the entire equality impact assessment process and the potential impacts of the policies within the Core Strategy on equality groups. This summary is provided on a City of Bradford District Council (CBMDC) Equality Impact Assessment Form which can be found in Appendix 2.

3.0 SCREENING OF THE CORE STRATEGY DPD – PROPOSED MAIN AND ADDITIONAL MODIFICATIONS

- 3.1 The Council is proposing 156 main modifications and 38 additional modifications to the Core Strategy Publication Draft. Each of these proposed main and additional modifications have been screened to determine if the proposed change to policy or the supporting policy text could have a disproportionate impact on any protected characteristic group. This screening assessment can be found in Appendix 1.
- 3.2 The screening assessment identified that the majority of the modifications were deemed to not have any equality implications and therefore would not require a full equality impact assessment.
- 3.3 However, the screening assessment identified that two policies, namely Policy HO9 'Housing Quality' and Policy HO12 'Sites for Travellers and Travelling Showpeople', would require a full equality impact assessment as there has been major or significant changes to the policy since the previous assessment which may result in the implementation of the policies having a potential disproportionate effect upon protected characteristic groups. These assessments can be found in Section 4.

4.0 EQUALITY IMPACT ASSESSMENT OF THE CORE STRATEGY DPD - PROPOSED MAIN MODIFICATIONS

- 4.1 The following two Core Strategy policies have been identified through the screening process to require a full equality impact assessment to assess whether either may have a disproportionate impact upon any equality group and if so, identify the mitigation measures which will be required to minimise the effects of the policies on those groups of people. These two policy assessments are provided in tables in the pages that follow.

- Policy HO9 – Housing Quality
- Policy HO12 – Sites for Travellers and Travelling Show People.

Table 1: Screening of the Local Plan: Core Strategy – Publication Draft Policies

Department of Regeneration Planning Service Local Plan Group	Completed by (Lead): Emma Higgins	Date of initial assessment: May 2009 – November 2015 (During Policy formulation)
Area to be assessed: (i.e. name of policy, function, procedure, practice or a financial decision)	Local Plan: Core Strategy – Proposed Modifications	
Is this existing or new function/policy, procedure, practice or decision?		New
What evidence has been used to inform the assessment and policy? (please list only)		
<p><u>Evidence used to inform previous iterations of the Equality Impact assessment:-</u></p> <ul style="list-style-type: none"> ▪ Equality Act 2010 ▪ 2001 Census Data ▪ 2011 Census Data ▪ Demographic Data ▪ National and Local Statistics ▪ National Planning Policy Framework ▪ Bradfordinfo.com ▪ ‘The Community Strategy’ and ‘Understanding Bradford District’ ▪ Core Strategy DPD – Issues and Options – Summary of Written Representations (2007) ▪ Core Strategy DPD – Further Issues and Options – Summary of Written Representations (2008) ▪ Core Strategy – Further Engagement Draft – Summary of Representations ▪ Core Strategy DPD – Evidence Base reports – relating to housing, economy and jobs, transport, environment, gypsies, travellers and travelling showpeople. <p><u>Recent evidence: -</u></p> <ul style="list-style-type: none"> ▪ Core Strategy – Publication Draft (2014) ▪ Core Strategy DPD – Evidence Base report – Gypsy and Traveller Accommodation Assessment. 		

Policy HO9 – Housing Quality			
1. Describe the aims, objectives or purpose of the function/policy, practice, procedure or decision and who is intended to benefit.	<p>This policy sets out the future standards of house building; encouraging new homes to be designed to be accessible and easily adaptable to support the changing needs of families and individuals over their lifetime, including people with disabilities and older people.</p> <p>The development of quality housing in line with the Governments national standards so that they are flexible, adaptable and equipped to cater for a variety of different and changing needs in people’s lives. The policy will particularly benefit the young, older and disabled people. People living on low incomes, who require social housing, may also benefit through the opportunity to live in decent accommodation which meets Government housing standards. Therefore it is considered that these groups will be the main target population who will positively benefit from these standards applied to new housing.</p>		
1a. Main Modification Reference: MM100 – MM107	<p>The amendments to Policy HO9 reflect recent changes to Governments planning policy in particular the new national housing standards which has resulted in the removal of the Code for Sustainable Homes and Zero Carbon Housing.</p> <p>The proposed modifications to the wording of criterion C could be deemed to have a less positive impact than the previous version as it introduces a site threshold of 10 units or more to which homes should be designed to be accessible and easily adaptable.</p> <p>The inclusion of ‘older people’ within the criterion C of the policy wording is welcomed.</p> <p>The production of a Housing Design Guide SPD which will address the requirement for homes to be accessible and adaptable is welcomed.</p>		
1b. Commentary	<p>Overall, Policy HO9 as proposed, would have a positive impact on all protected characteristic groups, particularly the elderly, young and disabled as it seeks to provide quality housing to meet specific needs. The policy reflects and complies with recent Government changes on housing standards and the Council proposes to produce additional planning guidance for developers in the form of a Supplementary Planning Document (SPD) on housing design which will include the requirements for accessibility. Therefore this policy is considered not to have an disproportionate negative effect in terms of equality considerations.</p>		
The Equality Act 2010 requires public bodies to have “due regard” to the need to:- (1) eliminate unlawful discrimination, harassment and victimisation; (2) advance equality of opportunity between different groups; and (3) foster good relations between different groups	2. Could the function/policy, procedure, practice or a decision have a disproportionately negative effect impact in terms of the aims set out in (1) to (3) of the Act on any of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N) for each.	3. Briefly explain how the function/policy, procedure, practice or decision furthers or prevents the aims set out in (1) to (3).	4. If there is a disproportionately negative impact on any protected characteristics, can it be justified on the grounds of promoting equality or any other reason? If yes, please explain.
	Age	No effect	The policy has positive effect both in terms of sustainability and life
	Disability	No effect	

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	Gender reassignment	No effect		
	Marriage and civil partnership	No effect		
	Race	No effect		
	Religion/Belief	No effect		
	Pregnancy and maternity	No effect		
	Sexual Orientation	No effect		
	Sex	No effect		

Policy HO12- Sites for Travellers and Travelling Showpeople	
1. Describe the aims, objectives or purpose of the function/policy, practice, procedure or decision and who is intended to benefit.	<p>This policy aims to ensure that provision is made for enough additional pitches to meet identified need and sets out the new pitch targets to this end. New pitches are to be identified through the Allocations and Area Action Plan DPDs and such sites should be in sustainable locations with accessibility to local services and transport infrastructure.</p> <p>Gypsy's, travellers and travelling show people are recognised as a minority ethnic group within the Bradford District and this policy will be beneficial in terms of 'race' as the policy will provide accommodation sites for them to live. Having permanent sites will benefit young residents of the community as they will be able to benefit from continued access to education facilities. Access to health care facilities will benefit the young and old, those with disabilities and child bearing women who may require these facilities more frequently. A small portion of this community may have low incomes.</p> <p>In considering the detailed needs of this minority group further work will need to be undertaken to establish the exact needs of the groups with regards to accessibility to services without the need for a car which particularly affects the young, elderly and those with mobility difficulties.</p> <p>There are a local and regional studies which have been undertaken to assess the current and required future provision of gypsy and traveller sites; these studies have been used to inform this policy. In terms of future provision, the Council monitors the number of additional pitches within the Annual Monitoring Report. This will provide an indication of this policies effectiveness over the plan period.</p>
1a. Main Modification Reference: MM110 and MM111	<p>This policy has been established within the Government guidance contained within 'Planning policy for traveller sites' and the Council has commissioned A Gypsy and Traveller Accommodation Assessment (July 2015) which provides a framework to ensure that the sites which will be identified in the forthcoming DPDs will meet in full the needs of the community and are in locations which are accessible to key services and facilities such as education, thereby enhancing quality of life.</p> <p>The proposed modification to the policy identifies pitch and site requirements for gypsies, travellers and travelling show people, based on up-to-date evidence of need up to 2030.</p>
1b. Commentary	<p>Overall this policy, as proposed to be modified, is considered to have a positive effect in terms of equality considerations on this protected characteristic group relating to race.</p> <p>The proposed modification to Policy HO11 reflects conclusions of the Gypsy and Traveller Accommodation Assessment (July 2015). The revised policy should have a potential positive impact in terms of providing accommodation to meet the identified needs, <u>in full</u>, of travellers and travelling showpeople. However, it is acknowledged that the implementation of this policy will require monitoring and a monitoring framework is provided within the Core Strategy.</p>

<p>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</p> <p>(1) eliminate unlawful discrimination, harassment and victimisation; (2) advance equality of opportunity between different groups; and (3) foster good relations between different groups</p>		<p>2. Could the function/policy, procedure, practice or a decision have a disproportionately negative effect impact in terms of the aims set out in (1) to (3) of the Act on any of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N) for each.</p>	<p>3. Briefly explain how the function/policy, procedure, practice or decision furthers or prevents the aims set out in (1) to (3).</p>	<p>4. If there is a disproportionately negative impact on any protected characteristics, can it be justified on the grounds of promoting equality or any other reason? If yes, please explain.</p>
<p>Protected characteristics</p>	<p>Age</p>	No effect		
	<p>Disability</p>	No effect		
	<p>Gender reassignment</p>	No effect		
	<p>Marriage and civil partnership</p>	No effect		
	<p>Race</p>	No effect	Potential for a significant positive effect that will improve the quality of life through the provision of sites and pitches to meet needs within the Bradford District.	
	<p>Religion/Belief</p>	No effect		
	<p>Pregnancy and maternity</p>	No effect		
	<p>Sexual Orientation</p>	No effect		
	<p>Sex</p>	No effect		

5.0 SUMMARY

- 5.1 The detailed Equality Impact Assessments which have been undertaken on the Core Strategy throughout its policy preparation has concluded that there are no identified negative or disproportionate impacts to any protected characteristic groups.
- 5.2 Overall, the Core Strategy will bring about positive benefits to all residents within the Bradford District through the provision of good quality homes and job opportunities in locations where people want to live and work along with creating a place which encourages sustainable lifestyle choices.
- 5.2 The Core Strategy includes a monitoring framework which is intended to be used to annually monitor the implementation and effectiveness of the policies within the Plan. Throughout the life of the Plan, the Council will be mindful of any adverse impacts which may result from the implementation of the policies which would lead to any disproportionate negative impacts upon any protected characteristic group.

Appendix 1

Local Plan for the Bradford District

Core Strategy DPD – Proposed Modifications

Equality Impact Assessment

**Screening Assessment of the Proposed Main & Additional Modifications
of the Core Strategy DPD –Publication Draft (2014)**

November 2015

Proposed Main Modifications - Section 3 Vision, Objectives and Core Policies

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike-through	Reasons for Modification	Equality Impact Assessment Screening Outcome
MM1	Page 27	Objective 2	<p>Amend objective 2, as follows:</p> <p>2. To ensure that the district's needs for housing, business and commerce are met in full in sustainable locations that reduce the need to travel and are well served by public and services, whilst prioritising, the use of deliverable and developable previously developed land. In so doing overcrowding within the existing housing stock should be reduced.</p>	To confirm that the plan will seek to meet the development needs for the plan period in full.	EIA not required.
MM2	Page 31	Policy SC1 Part B5	<p>Amend the wording as follows:</p> <p>'5. Support, protect and enhance the roles of the Principal Towns of Ilkley, Keighley and Bingley and the Local Growth Centres of Burley in Wharfedale, Menston, Queensbury, Thornton, Silsden and Steeton with Eastburn as hubs for the local economy, housing and community and social infrastructure and encourage diversification of the rural economy of the district.'</p>	The proposed modifications reflect the revised settlement hierarchy and changes within Policy SC4 which in turn reflects the revised HRA and the increased housing targets proposed for Burley and for Menston.	EIA not required. Modifications to the settlement hierarchy are dealt with under SC4.
MM3	Page 31	Policy SC1 Part B6	<p>Amend the wording as follows:</p> <p>'6. Support the Local Service Centres as defined in Policy SC4 in providing to meet local needs for homes and local services.</p>	The proposed modification reflects Council statement PS/F032. In that statement changes were advocated to remove any mistaken impression that the local housing need assessments would be required when planning applications are submitted and also to underline the fact that housing distribution targets have not been based on	EIA not required. This modification removes the potential impression that a local housing assessment would be required. The modification to the policy wording would still result in the same outcome, i.e. homes for local people therefore

				settlement by settlement local needs calculations.	would be beneficial to everyone.
MM4	Page 32	Paragraph 3.20 in support of Policy SC1	<p>Add following text at end of paragraph 3.20:</p> <p><u>'Criterion B (5), refers to supporting key hubs, these comprise a series of networks or convergence of functions of the individual towns and local centres where the growth of the local economy, an increase in the supply of housing and the development of the social structure of the community are all interrelated. The various components of the settlement when considered and addressed as a whole, can lead to a more balanced and sustainable centre. These locations, through their connected activity, will provide an important focal point for services, facilities and employment and cultural activity, improving their performance, management and attractiveness.'</u></p>	Clarification of the definition of 'Hubs' under Criterion B (5) of Policy SC1.	EIA not required. The proposed additional wording to this strategic policy would positively benefit everyone through the promotion of connectivity of services, facilities and employment activity.
MM5	Page 38	Policy SC3 Working Together	<p>Amend introductory text under criterion A as follows:</p> <p>'A. Effective collaboration between the Council, adjoining local planning authorities, the District's Town and Parish Councils, partners, <u>stakeholders</u> and communities within the District, Leeds City Region and beyond, particularly to:'</p>	Provide clarification on application of the policy.	EIA not required. This additional wording to the policy should improve the potential for equality related issues to be raised via the application of this policy.
MM6	Page 38	Policy SC3 Working Together	<p>Amend criterion 6, as follows</p> <p>'6. Achieve effective environmental management and enhancement and in order to address climate change.</p>	Provide clarification to application of the policy criterion.	EIA not required. Whilst the proposed wording amendment will not change the outcomes of this policy, it does provide clarity to the overall positive intentions of this policy and what it is aiming to

					achieve.
MM7	Page 42	Policy SC4	<p>Amend parts A and B of the policy relating to the Local Growth Centres:</p> <p>'Local Growth Centres</p> <p>A. Burley in Wharfedale, Menston, Queensbury, and Thornton, Steeton with Eastburn and Silsden are the most sustainable local centres and accessible to higher order settlements such as Bradford, Keighley and Ilkley. to the Regional City of Bradford and Steeton with Eastburn, and Silsden, are sustainable local centres within Airedale. All are located along key road and public transport corridors and should therefore make a significant contribution to meeting the districts needs for housing, employment and provide for supporting community facilities.</p> <p>B. The roles of Burley in Wharfedale, Menston, Steeton with Eastburn, Silsden, Queensbury and Thornton as accessible, attractive and vibrant places to live, work and invest should be enhanced.'</p>	<p>The proposed modifications reflect the revised HRA and the related increased housing targets for Burley and Menston. They reflect the sustainable nature of the two added settlements as locations for some growth.</p>	<p>EIA not required.</p> <p>Whilst this proposed modification to Policy SC4 and the settlement hierarchy is a significant change, the policy reflects the settlement hierarchy originally put forward within the Core Strategy Further Engagement Draft (FED) (2012). The EqlA of the FED has therefore been taken into consideration during this assessment.</p>
MM8	Page 43	Policy SC4	<p>Amend the first paragraph of the 'Local Service Centres' section of Policy SC4 as follows:</p> <p>Local Service Centres and Rural Areas</p> <p>Within the Local Service Centres of Addingham, Baildon, Burley in Wharfedale, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, Menston, Oakworth, Oxenhope, Wilsden the emphasis will be on a smaller scale of developments which meet local needs comprising both market and affordable housing together with the protection and enhancement of those centres as attractive and vibrant places and communities, providing quality of place and</p>	<p>The change which deletes Burley in Wharfedale and Menston reflects the proposed modification which changes the status of Burley in Wharfedale and Menston to being Local Growth Centres.</p> <p>The other changes in particular the deletion of point 5 of the policy reflect Council statement PS/F032. In that statement changes were advocated to remove any mistaken impression</p>	<p>EIA not required.</p> <p>Whilst this proposed modification to Policy SC4 and the settlement hierarchy is a significant change, the policy reflects the settlement hierarchy originally put forward within the Core Strategy Further Engagement Draft (FED) (2012). The EqlA of the FED has</p>

			<p>excellent environmental, economic and social conditions.</p> <p>Planning decisions and plans, strategies, investment decisions and programmes should seek to:</p> <ol style="list-style-type: none"> 1. Achieve a high standard of design that protects and enhances settlement and landscape diversity and character. 2. Support innovative means of accessing and delivering services and the reduction of isolation particularly through the development of high speed broadband access in rural areas. 3. Retain and improve local services and facilities, particularly in Local Service Centres. 4. Support economic diversification, including leisure and tourism offer, live work and home working. 5. Meet local needs for both market and affordable housing. 56. Create new and improve existing green areas, networks and corridors including the urban fringe to enhance biodiversity and recreation. 67. Improve public transport links between Local Service Centres and to the Regional City of Bradford, Principal Towns of Ilkley, Keighley and Bingley, the Regional City of Leeds, and the Principal Towns of Halifax and Skipton. 	<p>that the local housing need assessments would be required when planning applications are submitted and also to underline the fact that housing distribution targets have not been based on settlement by settlement local needs calculations.</p>	<p>therefore been taken into consideration during this assessment.</p>
MM9	Page 44	Outcomes table for Policy SC4	<p>Amend the outcomes table linked to Policy SC4 as follows:</p> <p>Burley in Wharfedale, Menston, Steeton with Eastburn, Silsden, Queensbury and Thornton will have made a significant contribution to meeting the districts needs for housing, employment and associated community facilities.</p> <p>Addingham, Baildon, Burley in Wharfedale, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, Menston, Oakworth, Oxenhope, Wilsden and rural areas will have seen a smaller scale of development to meet local needs.'</p>	<p>The modification reflects the changes to Policy SC4 which relate to the revised HRA and the increased housing targets for Burley in Wharfedale and Menston.</p>	<p>EIA not required.</p> <p>Whilst this proposed modification to Policy SC4 and the settlement hierarchy is a significant change, the policy reflects the settlement hierarchy originally put forward within the Core Strategy Further Engagement Draft (FED) (2012). The</p>

					EqlA of the FED has therefore been taken into consideration during this assessment.
MM10	Page 44-45	Paragraph 3.62	<p>Amend paragraph 3.62 as follows:</p> <p>Focusing development, investment and activity on the Regional City of Bradford, Shipley and Lower Baildon offers the greatest scope to: re-use land and buildings; make the most of existing infrastructure and investment; reduce greenhouse gas emissions and related impacts by reducing the need to travel; maximise accessibility between homes, services and jobs; foster wide-ranging inclusion and, encourage the use of public transport. Approximately 68% of the district’s housing development is planned for the Regional City under the proposals of Policy HO3. While this reflects the fact that the Regional City is likely to see the greatest rate of increase in the need for housing, the Plan envisages that there will need to be a modest degree of dispersal of housing growth to other settlements to reflect the land supply limitations in the Regional City to ensure that growth and regeneration is also fostered in the Principal Towns and to ensure that appropriate sufficient provision of a smaller scale is made for market and affordable and local needs housing in the Local Growth and Local Service Centres.’</p>	The modification reflects Council statement PS/F032. In that statement changes were advocated to remove any mistaken impression that the local housing need assessments would be required when planning applications are submitted and also to underline the fact that housing distribution targets have not been based on settlement by settlement local needs calculations.	<p>EIA not required.</p> <p>This modification removes the potential impression that a local housing assessment would be required. The modification to the policy wording would still result in the same outcome, i.e. homes for local people therefore would be beneficial to everyone.</p>
MM11	Page 47	Paragraph 3.71	<p>Amend paragraph 3.71 as follows:</p> <p>‘The Local Growth Centres within the district are, <u>Burley in Wharfedale, Menston</u>, Steeton with Eastburn, Silsden, Queensbury and Thornton, as identified on the Core Strategy Key Diagram and in the Sub Areas in section 4). They <u>are the most sustainable local centres and</u> vary in size and function but fulfil a significant role as settlements along key public transport corridors providing attractive and vibrant places for their surrounding areas. These centres will provide an important focal point for affordable housing and market housing needs as well as employment and associated community facilities -</p>	These modifications result from the revised status, within the settlement hierarchy, of Burley in Wharfedale and Menston as explained above.	<p>EIA not required.</p> <p>The proposed modifications to this supporting text reflect the changes to Policy SC4 as discussed in Modifications Numbers 6 and 7 above.</p>

			complementing and supporting the roles of the Regional City of Bradford, Sub Regional Town of Halifax and the Principal Towns of Skipton, Ilkley, Keighley and Bingley. This focus supports a pattern of service centres to meet the needs of rural areas and support a balanced pattern of sustainable development across the District with high quality links to Halifax, Skipton and Leeds beyond the District boundary.'		
MM12	Pages 47 & 48	Paragraphs 3.75 & 3.76	<p>Paragraphs 3.75 and 3.76 be amended as follows:</p> <p>3.75 A much slower pace and scale of growth, compared to urban areas, forms the overall approach in <u>the settlements these parts of the district, with development being focussed on meeting local needs</u> of Addingham, Baildon, <u>Burley In Wharfedale</u>, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, <u>Menston</u>, Oakworth, Oxenhope, Wilsden. Local Service Centres are the villages that provide services and facilities that serve the needs of, and are accessible to, people living in the surrounding rural areas. Local Service Centres include a range of settlement types and sizes.</p> <p>3.76 The Plan seeks to prevent the unnecessary dispersal of development to smaller settlements and open countryside while <u>allowing for meeting local needs and appropriate</u> limited types of development in the open <u>countryside countryside</u> in line with NPPF.'</p>	<p>These modifications result from the revised status, within the settlement hierarchy, of Burley in Wharfedale and Menston as explained above.</p> <p>The other changes reflect Council statement PS/F032. In that statement changes were advocated to remove any mistaken impression that the local housing need assessments would be required when planning applications are submitted and also to underline the fact that housing distribution targets have not been based on settlement by settlement local needs calculations.</p>	<p>EIA not required.</p> <p>The proposed modifications to this supporting text reflect the changes to Policy SC4 as discussed in Modifications Numbers 6 and 7 above.</p> <p>Further modifications to para 3.76 removes the potential impression that a local housing assessment would be required. The modification to the policy wording would still result in the same outcome, i.e. homes for local people therefore would be beneficial to everyone.</p>
MM13	Page 49	Paragraph 3.80	<p>Amend the paragraph as follows:</p> <p>It is a policy which should be applied both to the production of the site allocating DPD's. <u>and also to the consideration of larger windfall proposals which have the potential to frustrate the strategic objectives of this document and or</u></p>	<p>The modification is aimed at clarifying the role of the policy which is to guide the spatial and locational approach to development at the site allocations stage and not to unnecessarily prevent windfall</p>	<p>EIA not required.</p>

			set undesirable precedents for future proposals which individually or cumulatively may do likewise.	developments in sustainable locations which will help to secure a long land supply which lasts beyond the plan period.	
MM14	Page 49	Policy SC5	<p>Amend the second part of the policy as follows:</p> <p><u>Subject to above:</u></p> <p>B. In identifying and comparing sites for development, the Local Plan will adopt an accessibility orientated approach to ensure that development:</p> <ol style="list-style-type: none"> 1. Makes the best use of existing transport infrastructure and capacity. 2. Takes into account capacity constraints and deliverable improvements, particularly in relation to improving and development of the Strategic Road Network including junctions and schemes identified in the spatial vision. 3. Complies with <u>Meets or can be mitigated in order to meet</u> the public transport accessibility criteria set out in Appendix 3 and maximises accessibility by walking and cycling. 4. Maximises the use of rail and water for uses generating large freight movements. 	Clarification on application of Accessibility Standards in Appendix 3 and alignment with approach in used of standards to policies TR1 and TR3.	EIA not required. This proposed modification will ensure that proposals meet or seek to meet the transport accessibility criteria, thus having a positive impact upon all equality groups.
MM15	Page 53	Paragraph. 3.93 (supporting text to SC6)	<p>Amend paragraph 3.93 as follows:</p> <p>‘As a strategic core policy GI provides a common thread that links other important issues in the Core Strategy; local resilience to climate change (in relation to the provision of flood water storage, sustainable drainage and urban cooling), sustainable transport and housing, tourism, health and well-being and making space for water. Particular aspects of GI have been developed in the environment theme policies relating to biodiversity, recreation and open space, heritage,</p>	Clarification linked to HRA work and approach and Natural Englands recommendations.	EIA not required.

			design and landscape. <u>Providing high quality areas of natural greenspace on a suitable scale will assist in mitigating the adverse effects of increased recreation on the South Pennine Moors SPA/SAC.</u>		
MM16	Page 53	Policy SC6 Criterion B	<p>Add new sentence to criterion B, as follows:</p> <p>B. The River Corridors of the Aire and Wharfe and the South Pennine Moors are identified as strategic Green Infrastructure assets due to the opportunities offered to enhance the living landscape as a resource for people and wildlife and to address future needs for flood alleviation, water management, carbon capture and recreation. <u>Mitigating the adverse effects of increased recreation upon the South Pennine Moors SPA/SAC will be a priority.</u></p>	Clarification and Natural England's recommendations.	EIA not required.
MM17	Page 57	Policy SC7 Green belt	<p>Amended criterion B:</p> <p>B. <u>Exceptional Circumstances require</u> Green belt releases <u>required in order</u> to deliver <u>in full the</u> longer term housing and jobs growth in the District as set out in Policy HO3 and Policy EC3. <u>These changes</u> will be delivered by a selective review of Green Belt boundaries in locations that would not undermine the strategic function of green belt within the Leeds City Region and that would accord with the Core policies and the strategic patterns of development set out in <u>Policy Policies SC5 and SC4</u>. The Decisions on allocations on green belt land will be assessed against the purposes of including land in green belt as set out in national guidance. The selective review will be undertaken through the Allocations DPD in consultation with local communities and stakeholders.</p>	Provide clarity on exceptional circumstances which support the need to review the green belt as part of the Local Plan in line with paragraph 82 of NPPF.	EIA not required.
MM18	Page 57	Paragraph 3.102 under Policy SC7 Green Belt	<p>Amend paragraph 3.102, and split to form new paragraph 3.103, as follows:</p> <p>3.102 The general extent of the Green Belt in the District is shown on the Key Diagram. In general the District's Green Belt has helped to achieve the aims set out in NPPF.</p>	Provide clarity on exceptional circumstances which support the need to review the green belt as part of the Local Plan in line with paragraph 82 of NPPF.	EIA not required.

However, the Council considers, having reviewed the evidence and all reasonable alternatives, that exceptional circumstances exist which justify and require a change to the green belt. in order to meet its development needs for housing in full and in order to support long term economic success of the district. It is clear based on the land supply in the SHLAA that in order to meet the Housing requirement under policy HO1 in full would necessitate change to green belt to accommodate around 11,000 dwellings, given land supply constraints in non green belt land. This is supported by evidence in the growth study that land is available in the green belt in sustainable locations which would also not prejudice the strategic function of green belt. The evidence from the Employment Land Review suggests a limited mix of land of the right size and locations to ensure a quality offer for the plan period with only around 50 Hectares considered still suitable. To this end the plan under Policy EC3 identifies a new land supply of at least 135 hectares needs to be allocated which includes at least 84 hectares of new land currently not within the known supply. To this end the policy identifies 3 strategic areas which reflect key market locations where land could be made available in order to ensure a suitable offer of deliverable large sites in good market locations which are not available within the land supply in non green belt locations.

3.103 Therefore, the implementation of the Core Strategy will require, a change to the general extent of the Green Belt through the Allocations DPD in order to fully meet its development needs within the plan period to 2030 as set out in policies HO1, HO3 and EC3, as well as ensuring a green belt which lasts beyond the plan period. Based upon the current evidence of need and land supply a selective review of the green belt is required to meet the unmet needs which cannot be accommodated in non green belt areas. Localised changes to the Green Belt will be made in sustainable

			locations to meet identifiable development needs for which locations within the Regional City of Bradford, the Principal Towns, Local Growth Centres and Local Service Centres are not available. Any such changes will be considered in the context of policies SC1 – SC5, and is allowed for by policy SC7B.		
MM19	Page 58	Protecting the South Pennine Moors and their zone of influence Paragraph 3.104	Amend paragraph 3.104 as follows '3.104 <u>Assessment under the Habitats Regulations is an integral part of preparing a plan and is necessary to ensure that the plan in question does not lead to adverse effects on the ecological integrity of internationally important habitats or species assemblages within or close to the district.</u> The NPPF recognises the importance of the Habitat Regulations by stating in paragraph 119 that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined. The Appropriate Assessment of the Further Engagement Draft Core Strategy , required under the Habitat Regulations, assessed the potential impacts of policies and proposals in the plan on four nature conservation sites of European importance, the North and South Pennine Moors SAC and SPA.'	Following review of HRA and provide clarity on context.	EIA not required.
MM20	Page 58	Paragraph 3.105 Supporting Policy SC8 Protecting the South Pennine Moors and their zone of influence	Amend paragraph 3.105 as follows 'Potential for adverse effects on European Sites was identified via the following impact pathways:- <u>The assessment identified a range of likely significant effects that could result from the Core Strategy:</u> <ul style="list-style-type: none"> • Loss of supporting habitats (<u>directly or indirectly</u>) • Increased emissions to air from road traffic 	Update following review of HRA	EIA not required.

			<ul style="list-style-type: none"> • Collision mortality risk and/ or displacement from wind turbine developments • Recreational impacts, <u>including walkers, dogs, trampling and erosion and</u> • Urban edge effects, including fly-tipping, invasive species, wildfire and increased cat predation. ‘ 		
MM21	Page 58	Paragraph 3.106	<p>Amend paragraph 3.106 as follows</p> <p><u>‘Following recommendations, data was gathered to allow further assessment of loss of supporting habitat and recreational impacts on the South Pennine Moors.</u> The distribution and magnitude of impacts differs between the four designated areas. <u>Evidence is presented in HRA Reports to indicate that, if left unmitigated,</u> impacts are likely to be of a greater magnitude in relation to South Pennine Moors sites due to their relative proximity and accessibility to development proposed within the district. ‘</p>	Update following review of HRA	EIA not required.
MM22	Page 58 / 59	Paragraph 3.107	<p>Delete paragraph 3.107 and renumber subsequent paragraphs:</p> <p>‘The Draft HRA Report identified a range of actions that could help to avoid or mitigate the adverse effects of the Core Strategy. It recommended adjusting the scale and spatial distribution of development in order to achieve a position where adverse impacts on the South Pennine Moors SAC and SPA were capable of being avoided, managed and mitigated. It focused attention on the combined total of new dwellings over the plan period for the settlements of Addingham, Ilkley, Burley in Wharfedale, Menston, Bingley, East Morton, Silsden, Keighley and Worth Valley, that all fall within approximately 2.5km of the South Pennine Moors SPA and SAC.’</p>	Update following review of HRA	EIA not required.
MM23	Page 59	Paragraph 3.108	<p>Amend paragraph 3.108 (and renumber) as follows:</p>	Update following review of HRA	EIA not required.

			<p>'The zone lying within 2.5km of the South Pennine Moors SPA and SAC was identified in the HRA Report as the area most frequently utilised by SPA qualifying species. and where supporting high quality habitat of particular importance was to be found. To improve understanding of the use of the moorland fringe by birds of the SPA, surveys were undertaken to record bird activity. And the distribution of potentially important supporting habitats. While caution needs to be applied to the baseline survey and assessment work that has been carried out to date in relation to definitively identifying areas of importance for foraging birds, it is considered to be adequate for the purposes of a strategic plan. Sites have been identified which may be of importance and further assessment can take place at the allocations stage.'</p>		
MM24	Page 59	Paragraph 3.109	<p>Delete paragraph 3.109:</p> <p>'The broad 2.5km zone of influence was mapped and attention focused on the extent to which this encompasses the entire outer edge of a settlement. Based on the findings of the bird and habitat surveys and on the need to achieve some reduction in the overall numbers of houses that need to be accommodated within areas of greatest sensitivity, adjustments have been made to the overall distribution of development.</p> <p>Replace with the following renumbered paragraph</p> <p><u>'The hierarchy of Habitats Regulations Assessment of plans and policies means that proposals can be subject to further and more detailed assessment when more information is available in a lower tier plan. In the context of the Bradford Core Strategy, based on the information available, sufficient flexibility over the exact location, scale or nature of development needs to be retained to enable adverse effects on site integrity, in relation to the impact pathways identified, to be avoided. The level of mitigation that could be needed, in-combination impacts and the risks</u></p>	Update following review of HRA	EIA not required.

			<u>associated with having limited data available need to be considered.'</u>		
MM25	Page 59	Paragraph 3.109	<p>Delete paragraph 3.110</p> <p>While significant progress has been made in adjusting the scale and distribution of development, a strategic policy needed to be formulated that was capable of addressing outstanding adverse impacts, including elements of both avoidance and management and mitigation measures. The zone adjacent to the South Pennine Moors is evidently an area where change needs to be sensitively managed.</p> <p>Replace with the following renumbered paragraph</p> <p><u>'Appropriate assessment of the Allocations DPD will need to be able to demonstrate that, in relation to the impact pathways identified, the level of development proposed, including in-combination impacts, will not have an adverse effect on the integrity of the SPA/SAC.'</u></p>	Update following review of HRA	EIA not required.
MM26	Page 59	Paragraph 3.109	<p>Amend paragraph 3.111 (and renumber) as follows:</p> <p>'The information in the HRA Report justifies setting out a broad zone of influence policy and the identification of precautionary parameters in relation to the carrying capacity of zones around the site and avoidance and mitigation measures. The purpose of the policy set out below <u>and the overall approach</u> is to avoid potential adverse impacts on the South Pennine Moors SPA and SAC, yet to allow development to take place in locations and on a scale where potential impacts are at such a level that there is confidence they can be avoided and managed. that avoidance and mitigation measures can be effective.'</p>	Update following review of HRA	EIA not required.
MM27	Page 59	Paragraph 3.109	<p>Amend paragraph 3.112 (and renumber) as follows:</p> <p>'A wide range of policies contribute towards an overall approach of avoidance of impacts and management and</p>	Update following review of HRA	EIA not required.

			mitigation measures; Strategic Core Policy 2 Climate Change and Resource Use, Strategic Core Policy 6 Green Infrastructure, Policies EN 1 and 2 relating to Open Space and Biodiversity and a number of policies in the Transport section. Where direct impact pathways were identified, such as HO3 Housing Distribution and EN6 Energy, then a link has been made and amendments addressed.		
MM28	Page 59	SC8 Protecting the South Pennine Moors and their zone of influence	<p>Delete Policy SC8 in full and replace with comprehensively redrafted policy as follows:</p> <p>‘Strategic Core Policy (SC8): Protecting the South Pennine Moors and the South Pennine Moors SAC and their zone of influence</p> <p>Development will not be permitted where it would be likely to lead to an adverse effect upon the integrity, directly or indirectly, of the South Pennine Moors Special Protection Area and Special Area of Conservation. To ensure these sites are not harmed, a number of zones have been identified:</p> <p>Zone A</p> <p>No development involving a net increase in dwellings would be permitted within a suitable buffer area around the upland heath/ South Pennine Moors (normally 400m) unless, as an exception, the form of residential development would not have an adverse effect upon the sites’ integrity.</p> <p>Zone Bi</p> <p>Zone Bi would apply between 400m and 2.5km of the designated Site boundary</p> <p>Within Zone Bi the Council will take a precautionary</p>	Re-drafted SC8 is the outcome of a process initiated by the inspector as part of the examination and agreed with Natural England.	EIA not required. The comprehensive amendment of Policy SC8 strengthens the intentions of the Council to protect the natural environment and its important habitats. Whilst policy wording under ‘Zone C (i) and (ii)’ seeks to offset any impacts of development upon the natural environment within the zone of influence through the provision of accessible greenspaces and/or financial contributions, this requirement will benefit all in the locality.

<p>MM28 Cont</p>		<p>approach to the review and identification of potential Greenfield sites for development based on an assessment of carrying capacity using the available evidence from bird and habitat surveys and appropriate additional monitoring. The underlying principles will be to avoid loss or degradation of areas outside European Sites that are important to the integrity of sites and that sufficient foraging resources continue to be available, in order to ensure the survival of bird populations.</p> <p>Zone Bii</p> <p>Zone Bii would apply between 2.5km and up to 7km of the designated Site boundary</p> <p>Within Zone Bii appropriate assessment is still likely to identify significant adverse effects in combination with other proposals, however appropriate avoidance or mitigation measures should allow development to take place.</p> <p>Zones Bi and Bii</p> <p>Within Zones Bi (taking into account the need to avoid loss or degradation of areas outside European Sites that are important to the integrity of the sites) and Zone Bii residential developments that result in a net increase of one or more dwellings will be required to contribute to:</p> <p><u>In this Policy:</u></p> <p><u>Zone A is land up to 400m from the South Pennine Moors Special Protection Area (“SPA”) and South Pennine Moors Special Area of Conservation (“SAC”) boundary;</u></p>		
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<p>MM28 Cont.</p>			<p><u>Zone B is land up to 2.5km from the SPA and SAC boundary; and.</u></p> <p><u>Zone C is land up to 7km from the SPA and SAC boundary.</u></p> <p><u>Subject to the derogation tests of Article 6(4) of the Habitats Directive, in all Zones development will not be permitted where it would be likely to lead, directly or indirectly, to an adverse effect (either alone or in combination with other plans or projects), which cannot be effectively mitigated, upon the integrity of the SPA or the SAC.</u></p> <p><u>In conducting the above assessment the following approach will apply:</u></p> <p><u>In Zone A no development involving a net increase in dwellings would be permitted unless, as an exception, the development and/or its use would not have an adverse effect upon the integrity of the SPA or SAC.</u></p> <p><u>In Zone B it will be considered, based on such evidence as may be reasonably required, whether land proposed for development affects foraging habitat for qualifying species of the SPA.</u></p> <p><u>In Zone C, in respect of residential developments that result in a net increase of one or more dwellings, it will be considered how recreational pressure on the SPA or SAC, that such development might cause, will be effectively mitigated. The mitigation may be:</u></p>		
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MM28 Cont.			<p>(i) <u>such that the developer elects to offer, either on-site and / or deliverable outside the boundary of the development site, such as the provision of accessible natural greenspace and/or other appropriate measures; or</u></p> <p>(ii) <u>in the form of a financial contribution from the developer to:</u></p> <ol style="list-style-type: none"> 1. the provision of additional natural greenspace and appropriate measures to deflect pressure from moorland habitats and the long-term maintenance and management of that greenspace; 2. the implementation of access management measures, which may include further provision of wardens, in order to reduce the impact of visitors; 3. a programme of habitat management and manipulation and subsequent monitoring and review of measures. <p>To mitigate impacts on <u>the SPA and SAC European sites</u> due to the increase in population, an <u>SPD will an approach will be adopted that</u> sets out a mechanism for the calculation of the <u>financial Planning contributions, by reference to development types, the level of predicted recreational impact on the SPA or SAC, and the measures upon which such contributions will be spent.</u></p>		
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MM29	Page 60	Outcomes under Policy SC8	<p>Outcomes under policy SC8 be amended as follows:</p> <p>No sites have been identified that would have direct potential adverse impacts on European Sites.</p> <p><u>Sites where mitigation would be required have been identified.</u></p> <p>A range of management and mitigation measures and a funding mechanism have been identified that will allow <u>direct and indirect impacts to be managed and mitigated.</u></p>	Update following review of HRA	EIA not required.
MM30	Page 60	Indicators under Policy SC8	<p>Indicators under policy SC8 be amended, as follows:</p> <p>Area of upland fringe habitat protected and created.</p> <p><u>Further survey work has taken place and an approach to mitigation in relation to sites used for foraging has been identified.</u></p> <p><u>An SPD relating to management and mitigation measures and funding has been produced and adopted.</u></p> <p>Areas of <u>appropriate alternative</u> natural greenspace protected <u>have been identified for protection.</u></p> <p><u>Additional</u> areas of appropriate <u>alternative</u> natural greenspace created and maintained <u>have been identified and created.</u></p> <p><u>A management plan has been produced for the South Pennine Moors SPA/SAC.</u></p>	Update following review of HRA	EIA not required.
MM31	Page 61	Paragraph 3.113	Amend paragraph 3.113 (and renumber) as follows:	Update following review of HRA	EIA not required.

			<p>'The detailed review of available evidence presented in the HRA Report indicates that a precautionary spatial strategy would the approach should in the first instance seek to restrict residential development within 400m of the SAC/SPA boundary in order to avoid the risk of urban edge effects, as set out in Zone A. This is because, in most cases it will not be possible to be reasonably certain that such adverse effects could be avoided or alleviated at this distance.'</p>		
MM32	Page 61	Paragraph 3.115	<p>Amend paragraph 3.115 (and renumber) as follows:</p> <p>'In relation to Zone B_i, the review of the literature relating to the behaviour of SPA qualifying / typical bird species and survey data presented in the HRA Report, suggests that many indicates that a number of species travel as far as 2.5km from the SPA boundary to forage (and in some cases further). The area up to 2.5km from the SPA boundary is referred to as the supporting habitat management zone in the HRA Report. Within this zone, the Report recommends that new development must avoid direct (eg land take) and indirect (eg increased disturbance) impacts on supporting habitats. This has led to a re-assessment of the distribution of development within this zone in order to avoid potential adverse impacts, particularly direct land take. It does not rule out future development, provided an adequate programme of management and mitigation measures have been identified and mechanisms set out to achieve implementation of these. Based on review of the literature, the Report recommendations and early analysis of bird and habitat survey data, a precautionary approach to carrying capacity is necessary within this zone.'</p>	Update following review of HRA	EIA not required.
MM33	Page 61	Paragraph 3.116	<p>Amend paragraph 3.116 (and renumber) as follows:</p> <p>Early analysis of bird and habitat data has led to the identification of broad areas where development should be avoided. In circumstances where a need for local green belt releases has been identified and where a proportion of land adjoining the settlement lies within the 2.5km zone,</p>	Update following review of HRA	EIA not required.

			<p>the HRA Report recommends that areas of land will need to be identified that feature neither high numbers of birds nor good quality habitats. Consideration will be given to the benefits of identifying compensatory areas of land and</p> <p>Within Zone B, consideration needs to be given to whether land being proposed for development affects the foraging habitat of qualifying bird species, which may involve the collection and assessment of additional data. Further work will seek to ensure that areas regularly used by these birds can be protected from development and its associated impacts.</p> <p><u>Taking forward an approach to identify and deliver mitigation measures, where required within this zone, will form an important element in future planning.</u></p>		
MM34	Page 61	Paragraph 3.117	<p>Delete paragraph 3.117:</p> <p>'A more precautionary approach is therefore required to the identification of potential Greenfield sites for development within Zone Bi, until we reach the position of having a high degree of confidence that appropriate avoidance and mitigation measures can allow development to take place, in response to identified need and in appropriate locations.</p> <p>Replace with the following renumbered paragraph:</p> <p><u>Increased emissions to air were identified as an impact pathway in the HRA Report. However, linking pollution loads to core strategy proposals is not straightforward and at present proposals are not sufficiently specific and data is not available to fully assess the nature of impacts. The HRA Report therefore recommended that more detailed testing and traffic modelling should be undertaken to inform work on the Allocations DPD.</u></p>	Update following review of HRA	EIA not required.
MM35	Page 61/62	Paragraph 3.118	<p>Delete paragraph 3.118:</p> <p><u>In relation to Zone Bii (the zone between 2.5km and up to 7km of the designated site boundary), while appropriate assessment will still identify a significant adverse effect in</u></p>	Update following review of HRA	EIA not required.

			<p>combination with other proposals, avoidance or mitigation measures can allow land to be identified for development in the Local Plan and proposals to be approved. Recreational impacts are likely to be the major pressure generated by development within this zone.</p> <p>Replace with the following renumbered paragraph:</p> <p><u>Recreational impacts were identified as a key impact pathway and were subject to further investigation. Information presented in the HRA Report identified a range of issues including trampling and erosion, the effects of dogs and disturbance in relation to routes and access points.</u></p>		
MM36	Page 62	Paragraph 3.119	<p>Amend paragraph 3.119 (and renumber) as follows</p> <p>'Zone C in policy SC8 identifies a zone of visitor influence extending up to 7km from the boundary of the South Pennine Moors SPA/SAC based on visitor survey data, using postcode of origin and point of access to the SAC/SPA. Early analysis of data from visitor survey work carried out at a range of key access points to the South Pennine Moors within Bradford District during August and September 2013 has informed the outer limit of this zone. Respondents' postcode data from the 2013 visitor surveys has been geo-referenced using OS Code Point within GIS to generate projections of average distance travelled to site and establish a picture of the zone of influence of visits to the SAC/SPA. Research carried out on distances travelled to visit European Sites for recreation in other parts of the country and supported by Natural England has indicated an average distance travelled to reach the site of between 5 and 7km. The indicative zones are shown in Appendix 14.'</p>	Update following review of HRA	EIA not required.
MM37	Page 62	Paragraph 3.121	<p>Amend paragraph as follows:</p> <p><u>The evidence base for the forthcoming SPD will inform the</u></p>	Update following advice from Natural England as part of HRA further work	EIA not required.

			<p><u>identification and delivery of opportunities for additional greenspaces, improvements to existing areas and visitor access and management measures. These will be set out in a Strategic Access Management and Monitoring (SAMM) Strategy to better manage access arrangements within the SAC/SPA, in conjunction with the provision of alternative recreational spaces, which will allow appropriate, feasible and publicly acceptable means of mitigating residual impacts to be identified.</u> An approach will be adopted that sets out a mechanism for the calculation of the planning contribution towards the most beneficial mix of the management and mitigation measures identified in the policy. Where funding needs to be pooled from a number of development proposals, consideration will be given to include such measures in the Regulation 123 List of the Community Infrastructure Levy Regulations.</p>		
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Proposed Main Modifications - Section 4 Sub Area Policies

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike-through	Reasons for Modification	Equality Impact Assessment Screening Outcome																
MM38	Page 72	Policy BD1 Criterion A	<p>Amend text under criterion A, as follows:</p> <p>A. Strategic Pattern of Development</p> <p>In accordance with Policies H03 and EC3, the Regional City of Bradford (including Shipley and lower Baildon) will accommodate 28,650 <u>27,750</u> dwellings and approximately <u>at least</u> 100Ha of new employment land in the period up to 2030. The broad distribution of housing development is shown as follows:</p> <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="2" style="text-align: center;">Number of residential units</th> </tr> </thead> <tbody> <tr> <td style="padding-right: 20px;">Bradford City Centre</td> <td style="text-align: right;">3,500</td> </tr> <tr> <td>Shipley & Canal Road Corridor</td> <td style="text-align: right;">3,200 <u>3,100</u></td> </tr> <tr> <td>Shipley</td> <td style="text-align: right;">1,250 <u>750</u></td> </tr> <tr> <td>North East</td> <td style="text-align: right;">4,700 <u>4,400</u></td> </tr> <tr> <td>South East</td> <td style="text-align: right;">6,000</td> </tr> <tr> <td>South West</td> <td style="text-align: right;">5,500</td> </tr> <tr> <td>North West</td> <td style="text-align: right;">4,500</td> </tr> </tbody> </table> <p>Affordable housing requirements are set out in Policy HO11.</p>	Number of residential units		Bradford City Centre	3,500	Shipley & Canal Road Corridor	3,200 <u>3,100</u>	Shipley	1,250 <u>750</u>	North East	4,700 <u>4,400</u>	South East	6,000	South West	5,500	North West	4,500	<p>Amend as a consequence of main modification under policy HO3 to housing distribution.</p> <p>Amendment to reflect positive planning approach and aid clarity of policy on quantum of development.</p>	<p>EIA not required.</p> <p>Whilst this proposed modification to Policy BD1 is a significant change, the policy reflects strategy and the strategic pattern of development originally put forward within the Core Strategy Further Engagement Draft (FED) (2012). The EqIA of the FED has therefore been taken into consideration during this assessment.</p>
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Bradford City Centre	3,500																				
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South East	6,000																				
South West	5,500																				
North West	4,500																				
MM39	Page 72	Policy BD1 Criterion B (2)	<p>Amend wording of Criterion B (2) as follows:</p> <p>'2. The Shipley and Canal Road Corridor will see the creation</p>	<p>Amend as a consequence of main modification under policy HO3 to housing distribution.</p>	<p>EIA not required.</p> <p>This amendment reflects the proposed amendment within</p>																

			of 3,200 3,100 new homes by 2030. New homes will be provided in a range of locations in particular the centre section. As part of the Urban Eco Settlement ambitions the Corridor will deliver sustainable buildings with innovative and contemporary architecture, Bolton Woods wildlife area and a linear park and water features linking the town centre of Shipley to the City Centre of Bradford. This will all be supported by the creation of new cycleways and footways, and improvements to Frizinghall station and new road infrastructure including Canal Road Corridor Improvements and the Shipley Eastern Link Road. Opportunities to further improve public transport will be taken wherever possible.'		Modification No. 1.
MM40	Page 73	Policy BD1 Criterion C (2)	Amend text under criterion C (2) as follows: 2. North East Bradford, will see the creation of 4,700 4,400 new homes with associated community facilities, in particular open space and recreation facilities. The new homes will be delivered by a mix of sites but will include some local green belt changes in sustainable locations. A new high quality employment opportunity comprising a high quality including research and development led technology park and commercial enterprise will be located at Apperley Bridge (complemented by a new railway station and improvements to the Harrogate Road / New Line Junction). Walking and cycling networks will be enhanced including the upgrading of the canal towpath between North Bradford and Leeds.	Amend as a consequence of main modification under policy HO3 to housing distribution. Provide clarification on nature of employment opportunity expected at Apperley Bridge.	EIA not required. This amendment reflects the proposed amendment within Modification No. 1.
MM41	Page 73	Policy BD1 Criterion C (4)	Amend the first sentence as follows: South West Bradford will see the creation of up to 5,500 new homes.	The modification is made to ensure consistency of wording across each sub area and also to remove the incorrect impression that there is a ceiling imposed on this particular sub area's target which was not the Council's intention.	EIA not required.

MM42	Page 73	Policy BD1, Part C	<p>Add new criterion and number as C (5). with the text to be added as follows:</p> <p><u>5. Shipley will see the creation of 750 new homes by 2030 together with associated community facilities and new employment opportunities. The new homes will be delivered by a mix of sites but will include some local green belt changes in sustainable locations. The location and design of development will have regard to the requirement within Policy EN3 conserve those elements which contribute to the Outstanding Universal Value of Saltaire.</u></p>	<p>Provide clarity on approach to Shipley in support of part A of Policy.</p>	<p>EIA not required.</p>								
MM43	Page 74	Policy BD1, Criterion E.5	<p>Amend criterion as follows:</p> <p>Conserve and enhance the area's designated and undesignated heritage assets, in particular those in the Bradford City Centre, Little Germany, Goitside and the Registered Battlefield at Adwalton moor.</p>	<p>Clarification on key assets within the sub area</p>	<p>EIA not required.</p>								
MM44	Page 82	Policy AD1 Criterion A	<p>Amend text under criterion A, as follows:</p> <p>A. Strategic Pattern of Development</p> <p>In accordance with Policies H03 and EC3, Airedale will accommodate 8,350 8,450 dwellings in the period up to 2030 and an increase of new employment land of at least 30 Ha particularly in the digital technology sector. The broad distribution of housing development is shown as follows:-</p> <table data-bbox="616 1244 1232 1436" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>Number of residential units</th> </tr> </thead> <tbody> <tr> <td>Keighley</td> <td>4,500</td> </tr> <tr> <td>Bingley</td> <td>1,400</td> </tr> <tr> <td>Silsden</td> <td>1,000 1,200</td> </tr> </tbody> </table>		Number of residential units	Keighley	4,500	Bingley	1,400	Silsden	1,000 1,200	<p>Amend as a consequence of main modification under policy HO3 to housing distribution.</p> <p>Amendment to reflect positive planning approach and aid clarity of policy on quantum of development</p>	<p>EIA not required.</p> <p>Whilst this proposed modification to Policy AD1 is a significant change, the policy reflects strategy and the strategic pattern of development originally put forward within the Core Strategy Further Engagement Draft (FED) (2012). The EqIA of the FED has therefore been taken into consideration during this assessment.</p>
	Number of residential units												
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Bingley	1,400												
Silsden	1,000 1,200												

			<p>Steeton with Eastburn 700</p> <p>Baildon 450 <u>350</u></p> <p>Cottingley 200</p> <p>East Morton 100</p> <p>Affordable housing requirements are set out in Policy HO11.</p>		
MM45	Page 82	Policy AD1 Criterion B Silsden	<p>Amend text under criterion B, fourth paragraph, as follows:</p> <p>Silsden will see the creation of 1,000 1,200 new homes with associated community facilities and the creation of Silsden Rural Business Park. Supporting highway infrastructure will be provided together with good walking and cycling links to Silsden and Steeton railway and bus interchange station.</p>	Amend as a consequence of main modification under policy HO3 to housing distribution.	EIA not required. This amendment reflects the proposed amendment within Modification MM44.
MM46	Page 82	Policy AD1 Criterion B Cottingley & East Morton	<p>Amend text under criterion B, final paragraph, as follows:</p> <p>Cottingley and East Morton will see a smaller scale of housing development to meet local need including some local green belt changes in sustainable locations.</p>	To reflect Council statement PS/F032 where changes were advocated to remove any mistaken impression that the local housing need assessments would be required when planning applications are submitted and also to underline the fact that housing distribution targets have not been based on settlement by settlement local needs calculations.	EIA not required. This modification seeks to remove the potential impression that a local housing assessment would be required. The modification to the policy wording would still result in the same outcome, i.e. homes for local people therefore would be beneficial to everyone.
MM47	Page 83	Policy AD1 Criterion B Baildon	<p>Amend text under criterion B, sixth paragraph, as follows:</p> <p>Baildon will see the creation of 450 350 new homes including from sites within the area together with some local green belt changes in sustainable locations and associated community facilities.</p>	Amend as a consequence of main modification under policy HO3 to housing distribution.	EIA not required. This amendment reflects the proposed amendment within Modification No. 6.

MM48	Page 83	Policy AD1 Criterion D (2)	<p>Amend Criterion D (2) as follows:</p> <p>Protect and enhance the integrity of the South Pennine Moors SPA/SAC and identify measures to support valuable upland fringe habitats, <u>avoid the loss of important foraging land within the SPA's zone of influence</u> and <u>manage access to reduce mitigate</u> the impact of increasing visitor <u>numbers.</u></p>	Recommended in HRA Report.	EIA not required.
MM49	Page 84	Policy AD1 Criterion (D 6)	<p>Amend criterion D (6) as follows:</p> <p>'6. Conserve and enhance the designated and undesignated heritage assets <u>of the Airedale Corridor</u> in particular those within the boundary of the Keighley Townscape Heritage Initiative and <u>elements which make a significant contribution to the distinct character of this area including: the mills, chimneys and associated housing of its textile heritage in particular</u> Saltaire World Heritage Site, <u>the buildings and structures associated with the Leeds and Liverpool Canal, and the prehistoric landscapes'</u></p>	Clarification on the key heritage assets.	EIA not required.
MM50	Page 88	Policy AD2	<p>Add additional criterion, as follows:</p> <p><u>'G. To work with Yorkshire Water and the Environment Agency to understand fully the water and waste water infrastructure requirements needed to support growth and ensure that development proposals are aligned with investment in asset management and catchment management plans.'</u></p>	Clarification on approach to water infrastructure planning and delivery.	EIA not required.
MM51	Page 90	Policy WD1 Criterion A	<p>Amend text under criterion A, as follows:</p> <p>A. Strategic Pattern of Development</p> <p>In accordance with Policies H03 and EC3, Wharfedale will accommodate <u>at least 1,600 2,500</u> dwellings and <u>approximately at least</u> 5 Ha of new employment land in the</p>	<p>Amend as a consequence of main modification under policy HO3 to housing distribution.</p> <p>Amendment to reflect positive planning approach and aid clarity of policy on quantum of</p>	<p>EIA not required.</p> <p>Whilst this proposed modification to Policy WD1 is a significant change, the policy reflects strategy and the strategic pattern of</p>

			<p>period up to 2030. The Council will work closely with partner organisations to ensure that this development is sensitively managed to create vibrant and sustainable communities.</p> <p>The broad distribution of housing development is shown as follows:</p> <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th style="text-align: right;">Number of residential units</th> </tr> </thead> <tbody> <tr> <td>Ilkley</td> <td style="text-align: right;">800 <u>1,000</u></td> </tr> <tr> <td>Burley In Wharfedale</td> <td style="text-align: right;">200 <u>700</u></td> </tr> <tr> <td>Menston</td> <td style="text-align: right;">400 <u>600</u></td> </tr> <tr> <td>Addingham</td> <td style="text-align: right;">200</td> </tr> </tbody> </table> <p>Affordable housing requirements are set out in Policy HO11</p> <p>Within the Principal Town of Ilkley, <u>the Local Growth Centres of Burley in Wharfedale and Menston</u> and the Local Service Centres of Addingham, Burley in Wharfedale and Menston there are opportunities for development through infill whilst retaining the character of these places.</p>		Number of residential units	Ilkley	800 <u>1,000</u>	Burley In Wharfedale	200 <u>700</u>	Menston	400 <u>600</u>	Addingham	200	development.	development originally put forward within the Core Strategy Further Engagement Draft (FED) (2012). The EqIA of the FED has therefore been taken into consideration during this assessment.
	Number of residential units														
Ilkley	800 <u>1,000</u>														
Burley In Wharfedale	200 <u>700</u>														
Menston	400 <u>600</u>														
Addingham	200														
MM52	Page 90	Policy WD1 Criterion B	<p>Amend text under criterion B, as follows:</p> <p>B. Development including new housing provision will be focused as follows:</p> <p>Ilkley will see the creation of 800 1,000 new homes focused on urban redevelopment opportunities together with a significant contribution from green belt changes in sustainable locations. Provision will be made for associated community facilities, in particular new schools as required and provision of recreation and open space to address current deficiencies.</p>	<p>Amend as a consequence of main modification under policy HO3 to housing distribution.</p> <p>The modification to the text relating to local need is made to reflect Council statement PS/F032 where changes were advocated to remove any mistaken impression that the local housing need assessments would be required when planning applications are submitted and also to underline the fact that</p>	<p>EIA not required.</p> <p>This amendment reflects the proposed amendment within Modification MM51.</p> <p>In addition, this modification seeks to remove the potential impression that a local housing assessment would be required. The modification to the policy wording would</p>										

			<p>Addingham will see the creation of 200 new homes to meet local needs and associated community facilities.</p> <p>Burley in Wharfedale will see creation of 200 700 new homes to meet local need through redevelopment of sites within the settlement and <u>with a significant contribution from green belt changes, from some local green belt changes, together with associated community facilities.</u></p> <p>Menston will see the creation of 400 600 new homes based on existing permissions and other opportunities within the settlement boundary <u>and from some local green belt changes</u> together with associated community facilities.</p>	<p>housing distribution targets have not been based on settlement by settlement local needs calculations.</p> <p>The modification to the text relating to green belt change around Burley reflects the greater scale of green belt release which will be needed as a consequence of the higher housing target proposed.</p> <p>The modification to the text relating to green belt change around Menston is due to the fact that the CSPD target of 400 new homes could be met without any green belt change whereas the proposed slightly higher target will require some local green belt change. In all cases the need for green belt change is based on data on land supply from the SHLAA.</p>	<p>still result in the same outcome, i.e. homes for local people therefore would be beneficial to everyone.</p>
MM53	Page 91	Policy WD1 Criterion D (2)	<p>Add further sentence at end of Criterion D (2) as follows:</p> <p><u>Avoid the loss of important foraging land within the SPA's zone of influence and reduce mitigate the impacts of increasing visitor numbers.</u></p>	Recommended in HRA Report.	EIA not required.
MM54	Page 91	Policy WD1, Criterion D.5	<p>Amend Criterion D (5) as follows:</p> <p>Conserve and enhance the designated and undesignated heritage assets <u>of the Wharfe Valley especially those elements which make a significant contribution to the distinct character of this area including the distinctive</u></p>	Clarification on the key heritage assets.	EIA not required.

			<u>Victorian and Edwardian heritage of Ilkley and the prehistoric landscapes and rock art of Rombald's Moor.</u>																
MM55	Page 94	Paragraph 4.3.4	<p>Amend paragraph 4.3.4, as follows:</p> <p>The village of Addingham, on the edge of the Yorkshire Dales National Park, has retained its character and sense of place whilst <u>seeing a smaller scale of housing development and provision of meeting local needs for affordable housing and</u> local facilities. The village has also benefited from good bus connections to the principal town of Ilkley, the town of Silsden and neighbouring Skipton.</p>	See above and Council statement PS/F032.	<p>EIA not required.</p> <p>This modification seeks to remove the potential impression that a local housing assessment would be required. The modification to the policy wording would still result in the same outcome, i.e. homes for local people therefore would be beneficial to everyone.</p>														
MM56	Page 96	Policy PN1 Criterion A	<p>Amend text under criterion A, as follows:</p> <p>A. Strategic Pattern of Development</p> <p>In accordance with Policy H03, the South Pennine Towns and Villages will accommodate <u>at least 3,500 3,400</u> dwellings in the period up to 2030. The Council will work closely with partner organisations to ensure that this development creates vibrant and sustainable communities. The broad distribution of housing development is shown as follows:</p> <table border="0" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th style="text-align: right;">Number of residential units</th> </tr> </thead> <tbody> <tr> <td>Queensbury</td> <td style="text-align: right;">1,000</td> </tr> <tr> <td>Thornton</td> <td style="text-align: right;">700</td> </tr> <tr> <td>Cullingworth</td> <td style="text-align: right;">350</td> </tr> <tr> <td>Denholme</td> <td style="text-align: right;">350</td> </tr> <tr> <td>Harden</td> <td style="text-align: right;">100</td> </tr> <tr> <td>Haworth</td> <td style="text-align: right;"><u>500—400</u></td> </tr> </tbody> </table>		Number of residential units	Queensbury	1,000	Thornton	700	Cullingworth	350	Denholme	350	Harden	100	Haworth	<u>500—400</u>	<p>Amend as a consequence of main modification under policy HO3 to housing distribution.</p> <p>Amendment to reflect positive planning approach and aid clarity of policy on quantum of development.</p>	<p>EIA not required.</p> <p>Whilst this proposed modification to Policy PD1 is a significant change, the policy reflects strategy and the strategic pattern of development originally put forward within the Core Strategy Further Engagement Draft (FED) (2012). The EqIA of the FED has therefore been taken into consideration during this assessment.</p>
	Number of residential units																		
Queensbury	1,000																		
Thornton	700																		
Cullingworth	350																		
Denholme	350																		
Harden	100																		
Haworth	<u>500—400</u>																		

			<p>Oakworth 200</p> <p>Oxenhope 100</p> <p>Wilsden 200</p> <p>Affordable housing requirements are set out in Policy HO11</p>		
MM57	Page 96	Policy PN1 Criterion B	<p>Amend text under criterion B Third paragraph, as follows:</p> <p>The Local Service Centres of Cullingworth, Denholme and Haworth will between them see the creation of 1200 1100 new homes principally from sites within the existing settlement boundaries together with some local green belt changes. Provision will be made for associated community facilities in particular, health care facilities at Denholme, a community centre at Cullingworth and recreational facilities in Haworth.</p>	Amend as a consequence of main modification under policy HO3 to housing distribution.	EIA not required. This amendment reflects the proposed amendment within Modification MM56.
MM58	Page 97	Policy PN1 Criterion E (2)	<p>Amend criterion E and F to D and E respectively. Amend 'new' D (2) as follows:</p> <p>Protect the ecological integrity, the wilderness appeal and wide open skylines of the South Pennine Moors from adverse impacts, <u>including avoiding the loss of important foraging land within the SPA's zone of influence</u>, enhance the value and connectivity of upland fringe habitats and seek to manage pressure from visitors <u>reduce mitigate the impacts of increasing visitor numbers.</u></p>	Recommended in HRA Report.	EIA not required.
MM59	Page 97	Policy PN1, Criterion E (4)	<p>Amend criterion E (4) (proposed now D (4)), as follows:</p> <p>'Conserve and enhance the designated and undesignated heritage assets in particular those in Haworth conservation area of the Pennine towns and villages especially those elements which make a significant contribution to the distinct character of this area including: the mills, chimneys and associated housing of its textile heritage; and the buildings and landscapes</p>	Clarification on the key heritage assets.	EIA not required.

			<u>associated with the Brontes.'</u>		
MM60	Page 99	Paragraph 4.4.3	<p>Amend text as follows:</p> <p>Haworth continues to function as a widely recognised asset to the District with its Bronte Country heritage, the Bronte Parsonage Museum and the Keighley and Worth Valley Steam Railway. The traditional economy of the town has been diversified by providing accommodation for visitors, specialist shopping and dining experience as well as a popular location for film and television productions. Housing development in Haworth has continued to cater for local demand.</p>	The modification has been made to avoid future confusion. The reference to local demand is incorrect as no settlement by settlement demand based assessments have been carried out.	EIA not required. This modification removes the potential impression that a local housing assessment would be required. The modification to the policy wording would still result in the same outcome, i.e. homes for local people therefore would be beneficial to everyone.
MM61	Page 99	Paragraph 4.4.5	<p>Amend text as follows:</p> <p>The Pennine Villages of Oakworth, Oxenhope, Harden, Wilsden, Cullingworth and Denholme have retained their individual characters and sense of place <u>whilst seeing a smaller scale of housing development and the provision of meeting local needs for housing and</u> amenities served by improved bus and rail links to Keighley town centre, Bradford city centre, Bingley, Queensbury and neighbouring Halifax.</p>	The modification to the text relating to local need is made to reflect Council statement PS/F032 where changes were advocated to remove any mistaken impression that the local housing need assessments would be required when planning applications are submitted and also to underline the fact that housing distribution targets have not been based on settlement by settlement local needs calculations.	EIA not required. This modification removes the potential impression that a local housing assessment would be required. The modification to the policy wording would still result in the same outcome, i.e. homes for local people therefore would be beneficial to everyone.
MM62	Page 100	Policy PN2	<p>The first paragraph of Policy PN2 is modified as follows:</p> <p>To manage change in the Pennine Towns and Villages on a scale that meets local needs for housing, employment and renewal, enhances green infrastructure, heritage assets, community facilities and improves sustainable means of transport Partnership working between the public and private</p>	The modification to the text relating to local need is made to reflect Council statement PS/F032 where changes were advocated to remove any mistaken impression that the local housing need assessments would be required when planning	EIA not required.

			sectors, key stakeholder bodies and local communities should focus on:	applications are submitted and also to underline the fact that housing distribution targets have not been based on settlement by settlement local needs calculations.	
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Proposed Main Modifications - Section 5.1 Economy & Jobs

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike-through	Reasons for Modification	Equality Impact Assessment Screening overview
MM63	Page 105	Policy EC1 para 5.1.4	<p><u>Amend paragraph 5.1.4. as follows:</u></p> <p>5.1.4 In supporting Strategic Core Policy 1, the overall approach and key spatial priorities, Policy EC1 will help transform economic conditions across the District and manage and spread the benefits of economic growth as part of the wider Leeds City Region. It will enhance the role of Bradford as an important business location, with the principal towns and growth centres as hubs for the local economy. It will also help encourage diversification of the rural economy. The Policy will help support the renewal and regeneration of urban and rural areas thus contributing to the aims of Strategic Core Policy 3 – Working Together to Make Great Places together with Strategic Core Policy 4 which determines the hierarchy of settlements and their role in the economic development of the District. <u>The principal areas for future economic growth will be located in the Airedale corridor, in Bradford City Centre and the principal towns, in the M606 corridor and in the North East and South East Bradford-Leeds interface. These Economic Growth Areas will provide a range of sites for new high quality employment opportunities and commercial enterprise.</u></p>	To provide reference to the meaning or application of the term 'Economic Growth Area, Policies SC1 and EC1.	EIA not required. This amendment provides further clarify for Policy EC1.
MM64	Page 106	Policy EC1 Criterion K	<p>Amend Criterion K, as follows:</p> <p>'K. Opportunities for business relating to the Districts unique environmental assets and challenges, including <u>extraction</u></p>	Clarification on types of business's which may benefit from districts environmental	EIA not required.

			industries , sustainable construction, renewable energy, resource and waste efficiency and environmental technologies and the ‘low carbon economy’.	assets.	
MM65	Page 110	Policy EC2	Amend introductory text in Policy EC2, as follows: “The Council will support the delivery of at least 2897 1600 new jobs annually in the District in the period to 2030 through:”	To provide a clear indication of projected jobs growth rather than an aspirational figure.	EIA not required. The proposed modification reflects the evidence within the REM used to support the housing strategy; this provides a consistent approach throughout the Plan. The amended figure provides a clearer indication of the projected jobs growth than an aspirational figure, therefore this is not considered to have any equality implications.
MM66	Page 110	Policy EC2 - Targets	Amend target in third column of table below policy EC2 as follows: ‘Annual delivery of 2897 1600 jobs’	Consequential upon modifications to Policy EC2 above.	EIA not required. This amendment reflects the proposed amendment within Modification MM65.
MM67	Page 111	Policy EC2 paragraph 5.1.14	Amend paragraph 5.1.14, as follows: ‘5.1.14 The 2011 Regional Econometric Model projection produced a forecast of 26,726 new jobs by the year 2028, an average of approximately 1572 jobs annually. Employment was anticipated to be driven by growth in the business, professional, finance, service and health sectors with manufacturing experiencing an overall decline. It has been	To relate policy to projected jobs growth.	EIA not required. This proposed modification to the supporting text is a result of up to date evidence and information relating to job forecasts for the District.

			<p>calculated that this job growth equates to 146 hectares of employment land in the B Use Class across the District. However, the projections produced by the Employment Land Review and its update are based largely on trend based modelling of how the economy might perform in future years. In this respect they are not wholly complete assessments of jobs growth and related land requirement. Whilst the current economic trend indicates a growth of approximately 1352 1600 jobs per annum (excluding retail and Wholesale – REM March June 2013-2014), the <u>theoretical actual</u> need is <u>potentially</u> much greater. It is estimated that by 2030, a total of 55,298 (15.7%) of the working population will be claiming ‘Out of Work’ benefits. In order to attain full levels of employment in the District (providing jobs for everyone), the target number of jobs that would need to be created by 2030 is 4424 jobs per annum which is in reality, an unattainable aspiration. The strategy for a prosperous economy is to create the right conditions and opportunities for significant jobs growth across the District. It is not sustainable to accept the District’s high level of unemployment and economic inactivity and it is through policy EC2 an attempt is made to mitigate these circumstances. Since the number of claimants obtaining Job Seekers Allowance is estimated to reach 21,464 by 2030 and in addition, the growth in the working age population in full employment will increase by 27,800, there is a requirement for an average of a further 2897 new jobs annually to provide for this demand.’</p>		
MM68	Page 111	Policy EC2 Paragraph 5.1.15	<p>Insert new paragraph to follow existing paragraph 5.1.15 in support of Policy EC2, as follows:</p> <p><u>‘5.1.16 The Employment Land Reviews incorporated an assessment of the deliverability and potential market demand of the employment land within the Council’s employment land portfolio. This</u></p>	<p>To provide clarification on the nature of the potential new employment land supply as set out under Policy EC2.</p> <p>See related consequential minor</p>	<p>EIA not required.</p> <p>This proposed addition to the supporting text provides clarification on the nature of</p>

			<p><u>included remaining allocated employment sites from the Replacement Unitary Development Plan together with other sites which had planning backing such as an extant planning permission. The current employment land portfolio as determined at 1st April 2014 amounted to 116.03 hectares in total. This comprises of 106.68 hectares of land allocated in the Replacement Unitary Development Plan together with 9.35 hectares of land with other forms of planning backing such as planning permission. The assessment of this land indicates that, for the purposes of providing a new portfolio of employment land that will endure for the plan period and will secure opportunities for new investment and sustained economic growth, only 51.57 hectares are considered potentially suitable. Within the Bradford area, where the proposed allocation is at least 100 hectares, the current supply of potential good employment sites is 33.39 hectares, a shortfall 66.61. In Airedale, the supply is 18.18 hectares giving a shortfall of 11.82 hectares. There are no sites allocated in Wharfedale of reasonable market demand giving a requirement of 5 hectares. However, these figures will be re evaluated at Allocations stage when the details of all sites will be considered against a broad range of factors including competing demands for other land uses such as housing, infrastructure requirements, environmental impacts, and physical characteristics such as access.'</u></p>	<p>modification which renumbers subsequent paragraphs within this section.</p>	<p>employment land supply as set out in Policy EC2.</p>
MM69	Page 113	Policy EC3 Criterion A	<p>Amend criterion A, as follows:</p> <p>'A. The planned requirement for at least 135 hectares of employment land within the district will be distributed between the different parts of the LDF District as follows:</p> <p>1. 100 ha within City of Bradford</p>	<p>To correspond to the wording in Policy EC2 and need to plan positively for growth.</p>	<p>EIA not required.</p> <p>The amended wording is a positive addition as it removes the implication that 135ha was a target figure. The possibility of further employment sites within</p>

			<p>2. 30 ha in the Airedale Corridor</p> <p>3. 5 ha in the Wharfedale corridor'</p>		<p>the District, which in turn will provide job opportunities for residents will be beneficial to all.</p>
MM70	Page 116	<p>Paragraph 5.1.25 new text in support of Policy EC4</p> <p>Criterion D</p>	<p>Insert new paragraph to follow existing paragraph 5.1.25 in support of Policy EC4 Criterion 4, as follows:</p> <p><u>'5.1.27 Criterion D recognises that there are key locations within the main urban areas where existing industrial and business uses predominate. It is considered that these zones provide a range of sites of varying quality and rental supply which can be of particular advantage to the development of young or lower level economic enterprises. Such concentrations of employment activity can also provide the impetus for new business innovation and growth. The traditional employment activities of these areas will continue to play an important role in providing jobs for their surrounding communities.'</u></p>	<p>To provide clarity on the definition of Strategic Employment Zones.</p> <p>See related consequential minor modification which renumbers paragraphs within this section as a result of main modifications.</p>	<p>EIA not required.</p> <p>The additional wording in support of Policy EC4 (D) provides further evidence that Policy EC4 will have a positive impact upon the creation of job opportunities for local communities.</p>
MM71	Page 116	<p>Policy EC4</p> <p>Criterion D</p>	<p>Amend Criterion D as follows:</p> <p>'D. Identifying Strategic Employment Zones within the Allocations DPD and Area Action Plan DPD's where development proposals for non employment uses will not be permitted unless it can be demonstrated that the proposal relates to a use which supports the function of the function of the employment zone as a predominantly industrial area.'</p>	<p>To provide a more comprehensive allocations process within the Local Plan</p>	<p>EIA not required.</p>

Proposed Main Modifications - Section 5.3 Housing

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike-through	Reasons for Modification	Equality Impact Assessment Screening Outcome
MM72	Pages 154 & 155	Policy HO1 Supporting text paras 5.3.11 – 5.3.14	<p>Amend paragraphs 5.3.11 – 5.3.14 and additional new paragraphs as follows:</p> <p>'5.3.11 <u>Determining the scale of provision for new housing to plan for within this Core Strategy has involved two key stages. Firstly</u> in line with the NPPF, the Council has sought to undertake an objective assessment of the future need for new housing using robust and up to date evidence. <u>It has then considered whether it is feasible and appropriate to plan for this level of housing growth bearing in mind such factors as deliverability, land supply, environmental impacts and the need for a green belt review.</u></p> <p><u>5.3.12</u> The level of new housing required is difficult to assess because it is dependent on a range of complex and interdependent variables all of which have to be projected forward over the period of the plan. The Council has therefore sought independent advice on the level at which the housing requirement should be set by the commissioning of a Housing Requirement Study. The results of the Housing Requirement Study have then been incorporated into the SHMA update. The study looks at:</p> <ul style="list-style-type: none"> ▪ Official Government projections of expected population and household growth in the district; 	The modifications are made to reflect the further work carried out as part of the Housing Requirement Study and work at Leeds City Region Level. It is also aimed at clarifying the assessment of market drivers and indicators which informed the objective assessment of need. Finally it is aimed at conforming the Council's consideration of the implications of seeking to meet in full the objective assessment of need.	EIA not required. This modification to the supporting text of Policy HO1 provides clarification on the process of formulating the housing strategy for the Plan.

MM72 Cont.			<ul style="list-style-type: none"> ▪ The sensitivity of population and household growth to variables such as levels of migration; and ▪ The influence of projected economic and jobs growth on the number of new homes needed; and ▪ <u>Housing market indicators and drivers.</u> <p>5.3.1213 The population and household projections formulated by the Government and the Office For National Statistics are trend based and therefore highly sensitive to the trend period on which they are based. They are updated on a regular cyclical basis approximately every two years. The initial Housing Requirements Study was issued in February 2013 and was based on the then current 2008 based household projections. It was then has recently been supplemented by an addendum report which re-ran runs the modelling to incorporate the interim 2011 based household projections issued by the CLG in April 2013. <u>A further report was issued in September 2014. This update was commissioned as a result of work with neighbouring authorities within the Leeds City Region aimed at deriving a consistent approach to assessing housing need. The new work updated the core demographic and economic based scenarios of the earlier reports using recently released 2011 census data, updated jobs growth projections and the newly issued 2012 based population projections.</u></p> <p>5.3.1314 Full details of the Housing Requirements Study and the different iterations of the work are available on the Council's website. <u>In line with Government guidance, in each case the work generated a baseline demographic scenario.</u></p>		
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<p>MM72 Cont.</p>			<p>However one of but the key conclusions of the work is are that the district is expected to see rapid and sustained population growth over the period and that the housing requirement should be aligned to a level of household growth consistent with the expected expansion in the district's economy as indicated by the Regional Econometric Model. <u>The result is an increase or uplift in the assessment of housing need to a level well above the basic demographic scenario.</u> The rate of household formation which will occur within this growing population is more difficult to predict because it is more sensitive to changes in the economy and the housing market. The Addendum Report therefore recommended that the housing requirement be set at the mid point of a range of 1807 to 2565 dwellings per annum.</p> <p><u>5.3.15 In line with the NPPG the Council has also taken account of a range of market signals in its objective assessment of housing need. It has reflected on the information and analysis contained both within the Housing Requirement Study and the SHMA. The Government identifies a number potentially relevant market signals but in Bradford's case the most significant are considered to be past rates of development and overcrowding. Past rates of development have been significantly below both planned supply and below the average rate of household growth over the period. Levels of overcrowding within parts of the urban areas are high and have worsened in recent years. The Council considers that this indicates a level of unmet need which it has addressed via the addition of a further uplift to the housing need assessment.</u></p>		
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MM72 Cont.			<p><u>5.3.16 Having determined its objective assessment of need the Council has given careful consideration to whether that need can and should be met within Bradford District. Having regard to evidence such as the SHLAA the Council considers that the level of need can be accommodated and delivered. It has also used a range of evidence including the Bradford Growth Assessment and the Sustainability Appraisal to consider the implications of planning for this level of growth. In particular it has given careful consideration to the need for and implications of green belt changes. It considers that the district's housing needs can be met in full in a sustainable way and in accordance with the NPPF.'</u></p>		
MM73	Page 157	Paragraph 5.3.14 & 5.3.15	<p>Re-number and amend paragraphs 5.3.14 and 5.3.15, as follows:</p> <p>5.3.14 17 As set out in Policy HO1 and Table HO1 there are a number of key variables which combine to produce the housing requirement for the district.</p> <p>5.3.15 18 The Housing Requirement Study's base date is 2011 and <u>sets out its analysis of household growth and housing need up to 2030. The Core Strategy therefore indicates an the</u> estimated annual need <u>over from</u> that period <u>of is taken to be</u> 2200 dwellings in line with the report's recommendations. <u>The NPPF requires that the Local Plan makes provision for a period of 15 years from the expected date of adoption of the plan. Since the expected date of adoption of the Core Strategy has slipped to early 2015 the Housing Requirement must cover the period to 2030 rather than 2028 as envisaged when the</u></p>	The amendments reflect the fact that the Housing Requirement Study has now been updated and included a full assessment of need up to 2030. It simplifies and shortens the paragraph.	EIA not required. This modification reflects the need to provide an accurate position of the Plan and its evidence base.

			study was commissioned. The Council has therefore simply applied the study's findings for an additional 2 years.'		
MM74	Page 158	Paragraph 5.3.23	<p>Delete paragraph 5.3.23 and replace with a new paragraph as follows:</p> <p>The main sources of supply to meet the housing requirement as set out within Policy HO2, in addition to those houses already completed, are now explained in more detail.</p> <p><u>The housing requirement set out within Policy HO1 has already taken account of housing completions up to April 2013. In addition to any further completions after this date on sites with a capacity of 5 or more dwellings or above 0.2ha in size, the main sources of supply to meet the housing requirement are now explained in more detail.</u></p>	This modification makes minor changes to the existing paragraph to remove the wording which might have been read as implying that the housing requirement was set out in Policy HO2 (rather than HO1) and to be clearer that housing completions on certain sites for the period post April 2013 can count towards the housing requirement.	EIA not required.
MM75	Page 166	Policy HO3	<p>Amended housing distribution</p> <p>Within Table HO3 delete the following from the Local Service Centres section and then insert the same text within the Local Growth Centres section:</p> <p>"Burley In Wharfedale 518" "Menston 362"</p> <p>Amend the first line of the Local Growth Centres section of the table as flows:</p> <p>Local Growth Centres 2,196 3,076</p>	To reflect the proposed change to Policy SC4 which changes the designation of the two settlements to Local Growth Centres.	EIA not required. This modification is a result of proposed changes to Policies SC4.

			<p>Amend the first line of the Local service Centres section of the table as follows:</p> <p>Local Service Centres 4,850 <u>3,970</u></p>		
MM76	Page 167	Paragraph 5.3.56	<p>Reflecting earlier modifications paragraph 5.3.56 and re-number. Within the paragraph the third, fourth and fifth sentences are deleted and replaced with new text as follows:</p> <p>The only exceptions are Bradford City Centre and the Shipley Canal Road Corridor. Within the City Centre the housing targets to an extent reflect permissions already granted together with further ongoing viability work to suggest the levels of new homes that could reasonably be accommodated in the 2 key regeneration areas. With significant areas of the district effectively ruled out for accommodating significant additional development due to the impacts on the internationally important S Pennine Moors SAC / SPA, the only remaining alternative would be to allocate additional development to other parts of the regional city. With all urban in-settlement land options utilised fully this would mean further increasing the take on green belt. The Council considers that this would be an inherently unsustainable approach when compared to the benefits of locating development within the city.</p> <p><u>The Council has also taken account of the balance in sustainability terms of locating development within the Regional City with its access to services, infrastructure and public transport compared to increasing further the levels of development in lower order settlements. The presence of environmental constraints such as possible impacts on the S Pennine Moors SAC / SPA has also been taken into account.</u> Moreover the accommodation of development within the Canal Road Corridor and the City Centre will have significant investment and regeneration</p>	To better reflect the decision making process undertaken and reflect the revised HRA.	EIA not required. This proposed modification to the supporting text provides clarity to the decision making processes undertaken in reaching the proposed approach for the spatial distribution of housing across the District.

			benefits. The two relevant AAP's for these areas are already assessing in more detail how flood risk can be minimised or mitigated and will bring forward policies and proposals to this end. Overall it is therefore considered that the wider sustainability benefits of an approach which meets some of the housing need of the Regional City in these two areas significantly outweighs the flood risk issue.		
MM77	Page 168	Table HO4	<p>Within table HO4 amend the numbers and percentages as follows:</p> <p>The Regional City of Bradford 28,650 27,750 68.1% 65.9% +326 -574</p> <p>ShIPLEY & Canal Rd Corridor 3200 3100 7.6% 7.4% +3085 +2985</p> <p>ShIPLEY 4250 750 3.0% 1.8% -235 -735</p> <p>Bradford NE 4700 4400 11.2% 10.5% -2736 -3036</p>	The amendment reflects the proposed changes to the housing distribution within Policy HO3 which in turn reflects the revised HRA, updated land supply evidence within the third SHLAA and representations made in particular by English Heritage.	EIA not required. This proposed modification to Table HO4 reflects the strategy set out in Policy HO3 originally put forward within the Core Strategy Further Engagement Draft (FED) (2012). The EqlA of the FED has therefore been taken into consideration during this assessment.
MM78	Page 168	Paragraph 5.3.59	<p>Amend paragraph 5.3.59 as follows:</p> <p>Overall the proposed level of growth the Regional City closely matches lies just below the suggested baseline target and represents an increased concentration in this area as compared to that within the CSFED. This has been made possible by the updated and larger land supply within the area in the updated SHLAA and by the results of the Growth Study Bradford Growth Assessment which has identified additional potential areas of search for development around the city additional to those already</p>	To reflect the revised HRA and revised proposed distribution within Policy HO3.	EIA not required.

			contained within the SHLAA. The HRA relating to the S Pennine Moors SPA / SAC has also necessitated a re-adjustment away from certain settlements and consequent increase in the Regional City.		
MM79	Page 168	Paragraph 5.3.60	Amend paragraph 5.3.60 as follows: There are however significant differences between the different parts of the Regional City. Shipley , Bradford NE, SW and NW have all been assigned lower numbers than would be the case if the baseline targets were followed, largely due to land supply constraints in these areas.	To reflect the proposed reduction in the Shipley target.	EIA not required. The impact of this proposed amendment is considered under Policy HO3.
MM80	Page 69	Paragraph 5.3.61	Amend paragraph as follows: 'Conversely the Bradford SE figure lies well above the baseline target and this reflects the potential land supply in the area and the proposals for development both within and adjoining Holme Wood based upon the approved Neighbourhood Plan. It also reflects the results of the Growth Study Bradford Growth Assessment which recommended the SE area as a particular focus for growth.'	To reflect the correct title of this evidence base document.	EIA not required.
MM81	Page 169	Table HO5	Within table HO5 amend the numbers and percentages as follows: The Principal Towns 6,700 6,900 45.9% 16.4% -30 +170 Ilkley 800 1000 4.9% 2.4% -394 -194	To reflect the revised HRA and revised proposed distribution within Policy HO3.	EIA not required. This proposed modification to Table HO5 reflects the strategy set out in Policy HO3 originally put forward within the Core Strategy Further Engagement Draft (FED) (2012). The EqIA of the FED has therefore been taken into consideration during this assessment.

MM82	Page 169	Paragraph 5.3.62	<p>Amend paragraph 5.3.60 as follows:</p> <p>'The proposed overall target for the Principal Towns is also close to that indicated within the baseline distribution. However the housing target for Ilkley lies well slightly below both the baseline target and the target proposed within the CSFED.'</p>	To reflect the revised HRA and revised proposed distribution within Policy HO3.	EIA not required.
MM83	Page 170	Table HO6	<p>Amend the second line of the table as follows:</p> <p>Local Growth Centres</p> <p>3400 <u>4900</u> 8.1% <u>11.6%</u> +1204 <u>+1824</u></p> <p>Amend the entry for Silsden as follows:</p> <p>Silsden 700 <u>1200</u> 1.7% <u>2.9%</u> +367 <u>+567</u></p> <p>Amend the entry for Thornton as follows:</p> <p><u>Thornton 1000 700 2.4% 1.7%</u></p> <p>Add the following to the table</p> <p><u>Burley In Wharfedale 700 1.7% +182</u></p> <p><u>Menston 600 1.4% +238</u></p>	<p>To reflect proposed amendments to the settlement hierarchy (Policy SC4) and to reflect the revised HRA and revised proposed housing distribution within Policy HO3.</p> <p>Also reflects the fact that the Silsden figures in table HO6 were in any case incorrect.</p>	<p>EIA not required.</p> <p>This proposed modification to Table HO6 reflects the strategy set out in Policy HO3 originally put forward within the Core Strategy Further Engagement Draft (FED) (2012). The EqIA of the FED has therefore been taken into consideration during this assessment.</p>
MM84	Page 170	Paragraph 5.2.63	<p>Amend the paragraph as follows:</p> <p>'The Local Growth Centres are all locations which have been promoted to the third tier of the settlement hierarchy by virtue of their <u>status as sustainable local centres and their</u> role, function and accessibility to the larger settlements of <u>such as</u> Bradford, or Keighley <u>or to Ilkley</u>. They have a role in taking some of the development which</p>	To reflect proposed amendments to the settlement hierarchy (Policy SC4) and to reflect the revised HRA and revised proposed housing distribution within Policy HO3.	<p>EIA not required.</p> <p>This proposed modification reflects the strategy originally put forward within Policy SC4 and Policy HO3 within the Core Strategy Further Engagement Draft</p>

			would otherwise be allocated to either the Regional City, or to Keighley <u>or to Ilkley</u> . <u>The proposed targets for the Local Growth Centres reflect a balance between recognising their potential to accommodate some growth, the contribution that development can make to meeting housing need but also the need to reflect a number of environmental constraints. These include landscape and topography in the case of Queensbury and potential direct and indirect impacts on the South Pennine Moors SPA / SAC, and the 2.5km buffer zone around it, in the case of Silsden, Burley In Wharfedale and Menston. In the case of Queensbury, Thornton, and Steeton with Eastburn they are also assisting with the redistribution of development away from the SPA 2.5 km buffer zone. The growth assigned to Silsden has been significantly reduced as compared to the CSFED again as a result of the need to direct development away from the 2.5km buffer zone which overlaps a number of potential development sites on the eastern side of the settlement. The target for Queensbury has also been reduced since the CSFED in this case in order to reduce the need for green belt and maintain its separation from other areas and to reduce impacts on landscape and topography.</u>		(FED) (2012). The EqIA of the FED has therefore been taken into consideration during this assessment.
MM85	Pages 170 - 171	Table HO7	<p>Amend the second line of the table as follows:</p> <p>Local Service Centres</p> <p>3350 <u>2550</u> 8.0% <u>6.1%</u> -1501 <u>-1420</u></p> <p>Delete the following from the table</p> <p>Burley In Wharfedale 700 1.7% +182</p> <p>Menston 600 1.4% +238</p> <p>Amend the entries for Baildon and Haworth as follows:</p>	To reflect proposed amendments to the settlement hierarchy (Policy SC4) and to reflect the revised HRA and revised proposed housing distribution within Policy HO3.	EIA not required. This proposed modification to Table HO7 reflects the strategy set out in Policy HO3 originally put forward within the Core Strategy Further Engagement Draft (FED) (2012). The EqIA of the FED has therefore been taken into consideration during this assessment.

			<p>Baildon 450 350 1.4% 0.8% -904 -1001</p> <p>Haworth 500 400 1.2% 1.0% 17 -83</p>		
MM86	Pages 171 to 172	Policy HO3	<p>The following modifications are made to Policy HO3:</p> <p>Policy HO3: Distribution of Housing Development</p> <p>A. In accordance with the vision and spatial principles set out in this Plan, the forthcoming Allocations, Bradford City Centre and Shipley & Canal Road DPD's will allocate sufficient land to meet the residual housing requirement of at least 42,100 for the district between April 2013 and April 2030. This requirement will be apportioned as follows:</p> <p>3,500 (8% 8.3% of the district total) within the Bradford City Centre Area AAP;</p> <p>3,200 3,100 (8% 7.4% of the district total) within the Shipley & Canal Road Corridor AAP;</p> <p>35,400 35,500 (84% 84.3% of the district total) within the Allocations DPD.</p>	<p>Insertion of the words 'at least' is required to ensure consistency with the wording of Policy HO1.</p> <p>The figures have been amended to indicate the apportionment to 1 decimal point to give greater accuracy. The figures also reflect the changes to individual settlement apportionments.</p>	<p>EIA not required.</p> <p>This proposed modification reflects the strategy originally put forward within Policy HO3 within the Core Strategy Further Engagement Draft (FED) (2012). The EqIA of the FED has therefore been taken into consideration during this assessment.</p>
MM87	Pages 171-172	Policy HO3	<p>The following modifications are made to Policy HO3:</p> <p>B. The Apportionments between the different settlements of the district will be as follows:</p> <p>The Regional City of Bradford (28,650 27,750) Divided as follows:</p> <p>Bradford City Centre 3,500</p>	<p>Amended to reflect land supply position within the emerging third SHLAA and the representations by English Heritage relating to the impact of development on the Saltaire World Heritage site.</p>	<p>EIA not required.</p> <p>This proposed modification reflects the strategy originally put forward within Policy HO3 within the Core Strategy Further Engagement Draft (FED) (2012). The EqIA of the FED has therefore been taken into consideration</p>

			<p>Addingham 200</p> <p>East Morton 100</p> <p>Baildon 450 <u>350</u></p> <p>Harden 100</p> <p>Burley In Wharfedale 200</p> <p>Haworth 500 <u>400</u></p> <p>Cottingley 200</p> <p>Menston 400</p> <p>Cullingworth 350</p> <p>Oakworth 200</p> <p>Denholme 350</p> <p>Oxenhope 100</p> <p>Wilsden 200</p>	<p>Targets for Baildon and Haworth are adjusted in response to representations from English Heritage relating to the impact of development on conservations areas.</p>	
MM89	Page 173	Policy HO4	<p>Modifications are made to part B and C of the policy as follows:</p> <p>B. The plan period will be split into 2 phases with phase 1 covering the first 8 years and the second phase the final 7 years of the plan period to 2030. The Allocations DPD's will therefore need to allocate sufficient land to meet 8/15 of its <u>their</u> housing requirement as specified in Policy HO3 within the first phase and 7/15 of its housing requirement within the second phase.</p> <p>C. Detailed proposals for the allocation of sites within these phases and the trigger mechanisms for releasing land will be set out within the Allocations, Bradford City Centre and Shipley & Canal Road DPD's but will be based on the following principles:</p>	<p>Modification is proposed to clarify the intention of the policy to allocate to meet the housing requirement in full.</p> <p>Modification is proposed to clarify that the Allocations DPD will phase the release of land whereas within the two AAP's all land will be released at the start of the plan period.</p>	<p>EIA not required.</p> <p>The additional criterions to this policy will ensure the delivery of the required housing quantum and that the plan is adaptable and responsive to future changes. This strategic approach is a positive addition in equality terms as it ensures that there will be land available to provide homes for the residents of the Bradford District over the lifetime of the plan.</p>

MM90	Page 173	Policy HO4	<p>Criteria 7 of Policy HO4 is amended as follows:</p> <p>7. The need to ensure an even delivery pattern within smaller settlements and rural areas where sites are aimed at meeting local and affordable housing need over the whole period of the LDF Local Plan.</p>	To reflect the correct terminology within the NPPF.	EIA not required.
MM91	Page 173	Policy HO4	<p>Additional criteria D and E are inserted as follows:</p> <p><u>D. Consideration will be given to bringing forward large or complex sites within the first phase where this would aid delivery in full in the plan period or help to secure required investment and infrastructure;</u></p> <p><u>E. The Council will maintain a five year supply (plus NPPF buffer) of deliverable housing sites through considering release of the subsequent phase of sites to help address any persistent shortfall.</u></p>	<p>Modifications are proposed in response to representations made and discussions at the EIP hearings. The new criteria will ensure delivery of the required housing quantum.</p> <p>The modification is proposed in response to representations and to ensure that the plan is adaptable and responsive to any future scenario, however unlikely, where there is an insufficient supply of deliverable sites.</p>	<p>EIA not required.</p> <p>The additional criterions to this policy will ensure the delivery of the required housing quantum and that the plan is adaptable and responsive to future changes. This strategic approach is a positive addition in equality terms as it ensures that there will be land available to provide homes for the residents of the Bradford District over the lifetime of the plan.</p>
MM92	Page 173 - 174	Policy HO4	<p>Paragraph 5.3.69 is amended as follows:</p> <p>To reflect the changes to Policy HO4, paragraphs 5.3.69 to 5.3.73 are amended and new text added as follows:</p> <p>5.3.69 The use of a phasing policies policy within the 3 site allocating DPD's will effectively mean that some sites are held back from being developed until the second half of the plan period. It is important therefore that both details of the phasing approach and the selection of sites for the phases, as set out in the forthcoming Allocations DPD, Bradford</p>	<p>The modifications reflect a number of factors.</p> <p>Firstly the fact that following the completion of more detailed work on the AAP's it is now proposed that all land is released straight away in these areas. This is in recognition of the regeneration focus on these areas and the complexity of delivery within the</p>	EIA not required.

<p>MM 92 Cont.</p>			<p>City Centre and Shipley & Canal Road AAP's are designed to meet the housing delivery goals and targets of this document as well as those relating to co-ordinated infrastructure delivery and meeting previously developed land targets.</p> <p>5.3.70 <u>The Council will ensure that Policy HO4 supports housing delivery and regeneration in a number of ways – by being selective in where the phasing policy will apply, by ensuring that that the range of criteria for the actual placement of sites within a phase are designed to be broad and supportive of maintaining housing delivery, and by emphasising the importance of maintaining a 5 year land supply of deliverable sites. It is important to stress therefore that the range of criteria for the actual placement of sites within a phase are designed to be broad and supportive of maintaining housing delivery.</u></p> <p>5.3.71 <u>Policy HO4 will therefore apply to the assessment and allocation of sites within the Allocations DPD. However within the Shipley & Canal Road Corridor and Bradford City Centre AAP's all housing allocations will be released at the start of the plan period. There are several reasons for this.</u></p> <ul style="list-style-type: none"> • <u>Firstly this will ensure that a greater supply of sites is released in the early stages of the Local Plan period thereby enhancing delivery in the areas of the district where there is the most pressing need for new homes and for regeneration;</u> • <u>Secondly it reflects the fact that the preparation of the AAP's is now at an advanced stage.</u> 	<p>Canal Road Corridor.</p> <p>The modifications also reflect the insertion of new criteria D and E and revised timescales for adoption of the Core Strategy.</p> <p>The modifications also reflect the outcomes of the EIP hearings and the need to clarify the Council's position on the housing delivery trajectory, the 5 year land supply, and the pace at which the backlog in previous provision in new homes will be addressed.</p>	
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MM92 Cont.			<ul style="list-style-type: none"> • <u>In the case of the Shipley and Canal Road Corridor AAP the achievement of the proposed 3,100 homes is dependent on a small number of large and complex sites all of which have been assessed as potentially benefiting from the certainty that early release would provide.</u> • <u>In the case of the City Centre AAP there is very little differentiation between sites with all being previously developed land and all being highly accessible to public transport services. The advanced nature of the work on the AAP has also given assurance that there are no significant infrastructure based reasons for a phased land release in this area. The Council also considers that in most cases these sites would have the potential to further establish and accelerate the emerging pattern of investment and regeneration in the City Centre that is now underway. The market within the City centre is changing at a rapid rate and it is considered important that the AAP takes a flexible approach which supports delivery on sites as and when proposals for development and investment arise.</u> <p>5.3.72 <u>As a result of allocation of 8/15 of the supply within phase 1 of the Allocations DPD and the allocation of all housing land within phase 1 within the two AAP's, the total land supply released at the start of the Local Plan period will amount to at least 25,533 units or 61% of supply.</u></p> <p>5.3.73 <u>With regards to the detail of the phasing policy,</u> the decision to identify two phases and to make the first phase of a longer period than the second has been taken to ensure flexibility within the land supply and support delivery. An eight year first</p>		
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MM92 Cont.			<p>phase will also ensure that the use of a phasing policy will not undermine the ongoing existence of a 5 year land supply of deliverable sites. Based on the LDS programme and the expectation of achieving an adopted Core Strategy by February 2015 it is envisaged that the first phase will run from February 2015 to February 2023.</p> <p>5.3.74 Within strategic planning sub areas, careful consideration will need to be given to assigning within each phase a variety of site types and site locations to meet the needs for different types, sizes and tenures of housing and this will mean that although there will be a focus on brownfield sites, some greenfield sites will need to be assigned to the first part of the plan period. The results of the SHLAA will also be used to ensure the potential timing of delivery on sites is also taken into account. The Local Infrastructure Plan will also be a key input into the phasing process. To be clear, although the Council wishes to encourage the take up and delivery of previously developed land, there will be no bar on a particular type of site being placed within the first phase.</p> <p>5.3.75 While each of the 3 DPD's which will be allocating housing sites <u>the Allocations DPD as a whole</u> will need to allocate sufficient land in the first phase to meet 8/15 of its plan wide housing requirement, it will not be a requirement <u>for each settlement to release land to precisely the same proportions. In some settlements more than 8/15 may be released within the first phase and in some slightly less. This reflects the varying circumstances</u> to phase sites on a settlement by settlement basis and the fact that This would not be practical since some settlements will face more significant infrastructure issues while immediately deliverable land supply will also vary. <u>However</u></p>		
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MM92 Cont.			<p><u>unless there are sound planning reasons not to do so all settlement and sub areas should make a contribution to and release some land within phase 1.</u></p> <p>5.3.76 <u>The Council recognises that in some cases there will be relatively long lead in times and technical issues associated with bringing forward larger or more complex sites for residential development. In such cases early release and phasing may assist infrastructure planning and the securing of funding, and will also ensure that such larger sites are capable of delivering their completions in full within the plan period. Consideration will be given to opportunities to bring such sites forward for development, as part of the first phase, where this is appropriate and consistent with the overall strategy.</u></p> <p>5.3.77 The overall principles for the phasing approach within the Local Plan are therefore set out in this document within Policy HO4. The Housing Implementation Framework included in Appendix 6 also sets out how the Council will monitor delivery and this includes the implications of under achievement of on housing completions and brownfield development targets for the phasing approach. <u>The Council will also consider the early release of phase 2 sites in the unlikely event of a persistent shortfall (defined as being over 2 successive monitoring year periods) in 5 year land supply.</u> Appendix 6 also includes the <u>expected housing delivery trajectory. This in turn reflects the Council's approach to maintaining a 5 year land supply which includes allowing for a 20% buffer in additional supply brought forward from the later part of the plan period and resolving the backlog in previous</u></p>		
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MM92 Cont.			<p><u>provision over the full plan period (the 'Liverpool approach'). This reflects the need to boost delivery to meet the backlog but at a rate which would be practicable and deliverable.</u></p> <p>5.3.78 <u>Finally, to be clear, Policy HO4 is aimed at the process of allocating and phasing the release of sites in a managed and sustainable way in the subsequent Allocations DPD. It is not the intention that Policy HO4 be applied to prevent other future sustainable housing development proposals (which would be considered windfall development) from coming forward.</u></p>		
MM93	Page 175	Policy HO5 Paragraph 5.3.77	<p>Amend paragraph 5.3.77 as follows:</p> <p>The Government's NPPF therefore recognises that it is a legitimate role of the local plan to set density targets which reflect local circumstances. The local circumstances which warrant such targets in this plan include the massive scale of development which is needed to meet the district's growing population and the relatively constrained supply of deliverable land to meet that need, particularly within the main urban areas.</p> <p>In this context and in having regard to the need to promote urban regeneration and avoid the dispersal of development and increased journeys by car, the Council considers that all most developments should achieve a minimum density of 30 dwellings per hectare.</p>	The change is required to more accurately reflect the wording and intention of Policy HO5, the rest of the supporting text and the fact that some development will for good reasons not achieve 30dph.	<p>EIA not required.</p> <p>The amendment to this supporting text is not considered to have any equality implications.</p>
MM94	Page 175	Policy HO5	<p>Make the following minor amendment to criteria C</p> <p>C. Detailed density targets applying to specific sub areas will be set out within the Allocations, Bradford City Centre and Shipley & Canal Road Corridor DPD's. This will include those areas where local character of the</p>	A minor correction to reflect the full title of the AAP.	<p>EIA not required.</p>

			area would warrant lower densities or areas well served by public transport where higher densities may be required.		
MM95	Page 177	Paragraph 5.3.81	<p>After paragraph 5.3.81 add a new paragraph as follows:</p> <p><u>For the purposes of clarity, the targets set out within Policy HO5 relate to net densities. Net density is usually determined by measuring the number of dwellings against the net developable area of the site. The net developable area would include only those site areas which will be developed for housing and directly associated uses, including local access roads within the site, private garden space, car parking areas, incidental open space and children’s play areas, where these are provided.</u></p>	In response to representations and to EIP hearing discussions and to clarify the application of the policy.	EIA not required. The amendment to this supporting text is intended to provide clarity and is not considered to have any equality implications.
MM96	178	Policy HO6	<p>Amend Policy HO6 as follows:</p> <p>‘A. In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, the plans, programmes and strategies of the Council will give priority to the development of previously developed land and buildings.</p> <p>This will mean achieving the maximum possible overall proportion of housing development on previously developed land consistent with:</p> <ol style="list-style-type: none"> 1. the deliverable and developable land supply; 2. the need to maintain a 5 year land supply of deliverable sites; 3. the need to coordinate development with infrastructure provision; and 4. the need to maintain delivery of the scale and type of homes required throughout the plan period; 	<p>The following modifications are made to reflect two concerns expressed during the EIP hearings.</p> <p>Firstly that the percentages should be clearly and consistently expressed as targets rather than requirements – the Council considered that the intention was that the policy was to set targets.</p> <p>The second concern related to whether the targets specified were achievable given the data within the SHLAA. The Council considers that though challenging the targets are achievable, however given those challenges use of the word ‘minimum’ would not be appropriate as it would</p>	EIA not required. The amendment to this supporting text is intended to provide clarity and is not considered to have any equality implications.

			<p>B. District wide, a minimum of 50% of total new housing development over the Local Plan period will be on previously developed land.</p> <p>C. In order to achieve the district wide target of 50%, the Allocations, Bradford City Centre and Shipley and Canal Road DPD's should bring forward land and manage its release so as to deliver at least the following proportions of housing development on previously developed land:</p> <ul style="list-style-type: none"> • In the Regional City of Bradford a minimum of 55% • In the Principal Towns a minimum of 50% • In the Local Growth Centres a minimum of 15% • In the Local Service Centres a minimum of 35% <p>D. The Council will monitor performance against these targets and will take action if performance slips outside of the defined acceptable ranges as set out in the housing implementation framework.'</p>	<p>imply a likelihood of achieving above the levels specified which may not prove possible.</p>	
MM97	Page 177	Paragraph 5.3.84	<p>Amend paragraph 5.3.84 , as follows:</p> <p>'Policy HO6, together with the implementation strategy included in Appendix 6 therefore sets out the priority that the Council will give to maximising the contribution which previously developed land makes to the provision of new homes, and indicates minimum targets for the proportion of housing completions which should be on previously developed land which reflects the evidence base, in particular the SHLAA. The policy therefore supports both the Core Strategy's place specific vision for Bradford and strategic objective 2.'</p>	<p>See above.</p>	<p>EIA not required.</p>

MM98	Page 179	Paragraph 5.3.88	<p>Amend paragraph 5.3.88, as follows:</p> <p>'The district wide target of 50% of new housing on brownfield land is a realistic one based on the land supply data within the SHLAA. <u>The targets though challenging are considered achievable.</u> have also been expressed as minima as the Council believes that there may be limited scope to further increase the proportion of brownfield delivery. For example The SHLAA has taken a cautious view of development potential within the City Centre and there are a range of schemes not currently within the trajectory which may well come forward once the economy recovers albeit at lower densities than was the case when permissions were originally granted. Further brownfield supply may also materialise via the recycling of land in the urban areas, particularly within the Bradford and Keighley, and as a result of recent Government changes to allow the conversion of offices to residential use.'</p>	See above.	EIA not required.
MM99	Page 186	Policy HO8 Paragraph 5.3.116.	<p>Amend paragraph 5.3.116. as follows:</p> <p>'When an appropriate mix of housing on site is being negotiated, decisions should take account of local market demand, the balance between general market supply and demand and evidence of local need to ensure the site contributes to the overall mix of housing in the locality. <u>The viability of achieving an appropriate housing mix should also be considered.</u> The SHMA, and any more detailed and localised evidence of housing need and demand, such as local or village needs surveys, will form the main basis on which the creation of an appropriate and sustainable mix of house types within larger sites will be judged both at the level of plan making and in considering planning applications.'</p>	To ensure it is clear that viability will be a consideration in determining an appropriate housing mix under Policy HO8	<p>EIA not required.</p> <p>The inclusion of this text forms an additional consideration within the decision making process, however viability should not be to the detriment of providing the range of housing mix identified within criterion D of the Policy during the decision making process.</p> <p>Overall, Policy HO8 would have a positive impact on all protected characteristic groups, particularly the elderly,</p>

					young and disabled due to the emphasis of providing housing to cater for their needs.
MM100	Page 189	Policy HO9	<p>Amend Policy HO9 as follows:</p> <p>'A. New housing development should be high quality and achieve good design.</p> <p>B. The Council will encourage and support all new housing residential developments to meet-achieve the highest possible sustainable design and construction standards. Subject to feasibility and /or viability, The minimum acceptable sustainable housing standards are set out in the building regulations with reference to the Code For Sustainable Homes or any national equivalent will be:</p> <ul style="list-style-type: none"> • Code Level 4 from the date of adoption, and • Zero Carbon Housing (or any national equivalent) from 1st April 2016 <p>C. Larger housing sites should include a proportion of new homes which are should be designed to be accessible and easily adaptable to support the changing needs of families and individuals over their lifetime, including older people and people with disabilities.</p> <p>D. New development should provide private outdoor space for homes, unless site constraints make this clearly unfeasible and/or unviable.</p>	To ensure Policy HO9 is consistent with latest National Planning Policy in regards to national housing standards	<p>EIA required.</p> <p>The amendments to Policy HO9 reflect recent changes to Governments planning policy in particular the new national housing standards which has resulted in the removal of the Code for Sustainable Homes and Zero Carbon Housing.</p> <p>The proposed modifications to the wording of criterion C could be deemed to have a less positive impact than the previous version as it introduces a site threshold of 10 units or more to which homes should be designed to be accessible and easily adaptable.</p> <p>The inclusion of 'older people' within the criterion C of the policy wording is welcomed.</p> <p>The production of a Housing Design Guide SPD which will address the requirement for homes to be accessible</p>

<p>MM100 Cont</p>			<p>E. New homes should be well laid out internally and should provide suitable space standards appropriate to the type of home. Rooms should receive adequate levels of daylight.</p> <p>F. New development should provide adequate storage for bins, recycling and cycles. These should be located or designed in a way which is both convenient for residents and supports the quality of the street scene.</p> <p>G. Specific guidance on housing quality and design on an area or site basis will be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs and Neighbourhood Plans. Higher standards of sustainable design and construction may be required for certain sites or areas where it is feasible and viable to do so.'</p>		<p>and adaptable is welcomed.</p> <p>Overall, Policy HO9 would have a positive impact on all protected characteristic groups, particularly the elderly, young and disabled as it seeks to provide quality housing to meet specific needs.</p>
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MM101	Page 190	Policy HO9	<p>Amend targets table in support of policy HO9, as follows:</p> <table border="1" data-bbox="633 264 1274 1353"> <thead> <tr> <th data-bbox="633 264 857 331">OUTCOMES</th> <th data-bbox="857 264 1093 331">INDICATORS</th> <th data-bbox="1093 264 1274 331">TARGETS</th> </tr> </thead> <tbody> <tr> <td data-bbox="633 331 857 533">Housing that is high quality and achieves good design</td> <td data-bbox="857 331 1093 533">% of major housing schemes achieving no reds in Building for Life 12 Assessments IND23(EV)</td> <td data-bbox="1093 331 1274 533">No planning permissions for a major housing scheme should achieve a 'red' rating against Building for Life 12 assessment</td> </tr> <tr> <td data-bbox="633 533 857 810">Housing that meets high standards of environmental performance as set out by Government</td> <td data-bbox="857 533 1093 810">% of new dwellings achieving Code Level 4 Operational</td> <td data-bbox="1093 533 1274 810"></td> </tr> <tr> <td data-bbox="633 810 857 1353">Housing that is accessible and easily adaptable which caters for the needs of the district's growing population</td> <td data-bbox="857 810 1093 1353">% of new dwellings achieving Lifetime Homes Standard or any national equivalent optional technical standards for accessible and adaptable dwellings and wheelchair user dwellings Operational</td> <td data-bbox="1093 810 1274 1353"></td> </tr> </tbody> </table>	OUTCOMES	INDICATORS	TARGETS	Housing that is high quality and achieves good design	% of major housing schemes achieving no reds in Building for Life 12 Assessments IND23(EV)	No planning permissions for a major housing scheme should achieve a 'red' rating against Building for Life 12 assessment	Housing that meets high standards of environmental performance as set out by Government	% of new dwellings achieving Code Level 4 Operational		Housing that is accessible and easily adaptable which caters for the needs of the district's growing population	% of new dwellings achieving Lifetime Homes Standard or any national equivalent optional technical standards for accessible and adaptable dwellings and wheelchair user dwellings Operational		To ensure the monitoring framework is updated to reflect changes proposed through main modifications to policy HO9	<p>EIA required.</p> <p>This proposed modification to the supporting text reflects the changes to Policy HO9 under MM100.</p> <p>This modification has been assessed as part of MM100.</p>
OUTCOMES	INDICATORS	TARGETS															
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MM102	Page 191	Paragraph 5.3.138	<p>Amend paragraph 5.3.138 as follows:</p> <p>'Under Criterion B the council will encourage developers to bring forward proposals which meet the highest possible standards of sustainable design and construction, which should meet at least All new development should attain a high standard of sustainable construction in line with the prescribed national standards at the time of application. New housing should achieve the zero carbon housing standard (or any national equivalent) in line with the timescales set out in the national zero carbon housing policy. The council will encourage and support developments which exceed the national minimum standards. All new housing developments of 10 or more dwellings will be expected to meet the Code for Sustainable Homes Level 4, and from 1st April 2016 all new housing must meet the Zero Carbon Homes standard or any national equivalent. If the proposed standards are below those set out in Policy HO9 then the onus will be on applicant to justify why development to these standards cannot be achieved.</p>	<p>To ensure the supporting text reflects proposed changes through main modifications to Policy HO9 in regards to removal of reference to the Code for Sustainable Home and is consistent with National Planning Policy</p>	<p>EIA required.</p> <p>This proposed modification to the supporting text reflects the changes to Policy HO9 under MM100.</p> <p>This modification has been assessed as part of MM100.</p>
MM103	Page 191	Paragraph 5.3.139	<p>Amend paragraph 5.3.139 as follows:</p> <p>'This requirement will be assessed through evidence provided by the applicant that the scheme will achieve the standards set out in the policy (or any subsequent revised national standards). The evidence submitted by the applicant should enable easy assessment and applicants are encouraged to undertake a Design Stage Assessment of performance against the Code for Sustainable Homes. A post construction stage certificate confirming that the development has met the required standard will be required prior to occupation. The council will encourage and support developments which exceed the national minimum sustainable housing standards, particularly efficiency standards. The council will also support the use of on site</p>	<p>To ensure the supporting text reflects proposed changes through main modifications to Policy HO9 in regards to removal of reference to the Code for Sustainable Home and is consistent with National Planning Policy.</p> <p>To ensure it is clear that the Council through Policy HO9 will support on site renewable or low carbon energy generation where appropriate and feasible, to help reduce carbon emissions and support the Council's carbon</p>	<p>EIA required.</p> <p>This proposed modification to the supporting text reflects the changes to Policy HO9 under MM100.</p> <p>This modification has been assessed as part of MM100.</p>

			<u>renewable or low carbon energy generation, where appropriate and feasible, to help meet the energy requirements of the development and reduce carbon emissions.'</u>	reduction target.	
MM104	Page 191	Paragraph 5.3.140	Amend paragraph 5.3.140 as follows: 'Under Criterion C The council will encourage and support all new homes should be which are designed to provide enhanced accessibility or adaptability designed to be accessible and easily adaptable. This includes accessible and adaptable dwellings and wheelchair user dwellings, as set out in the national optional technical standards for housing. Where feasible and viable the council will encourage new housing to achieve In addition the council will support the Lifetime Homes Standard <u>as a model for building accessible and adaptable homes.'</u>	To ensure the supporting text reflects proposed changes through main modifications to Policy HO9 in regards accessible housing standards and is consistent with National Planning Policy.	EIA required. This proposed modification to the supporting text reflects the changes to Policy HO9 under MM100. This modification has been assessed as part of MM100.
MM105	Page 191	Paragraphs 5.3.141. & 5.3.142	Amend paragraph 5.3.141 as follows: ' Under Criteria C larger sites of 10 dwellings or more will be expected to should include a proportion of accessible homes as part of the overall housing mix. This will be assessed through evidence provided by the applicant that a proportion of new homes on a site housing will achieves Lifetime Homes standards, the British Standards for Accessible Housing or any subsequent revised exceed the national minimum requirement for access. accessible housing standard. If these standards are not met, this should be clearly justified and the applicant should demonstrate how the development meets the requirements of Criterion C. <u>In considering Criteria C regard will be had to local need and the viability and feasibility of delivering accessible homes on a particular site. Site specific factors such as vulnerability to flooding, the topography of the site or other circumstances which may make a site less suitable for accessible dwellings will also be taken into account, particularly where step</u>	To ensure the supporting text reflects proposed changes through main modifications to Policy HO9 in regards to the requirement for larger sites to include a proportion of accessible housing and is consistent with National Planning Policy. To set out that the council will undertake further detailed work in line with the NPPG in regards to the proportion of accessible and adaptable and wheelchair user dwellings and that the Housing Design Guide will take account of this in advance of any adopted policy in the Local Plan.	EIA required. This proposed modification to the supporting text reflects the changes to Policy HO9 under MM100. The production of a Housing Design Guide SPD which will address the requirement for homes to be accessible and adaptable is welcomed. This modification has been assessed as part of MM100.

			<p><u>free access cannot be achieved or is not viable.</u></p> <p>Insert new paragraph to follow:</p> <p><u>The council intends to undertake further detailed work in regards to the requirement for accessible, adaptable and wheelchair user dwellings in accordance with the latest National Planning Policy Guidance. The Housing Design Guide will take account of this work and provide further guidance in relation to the proportion of accessible, adaptable and wheelchair user dwellings required in advance of any adopted policy in the Local Plan.</u></p>		
MM106	Page 191	Paragraph 5.3.143	<p><u>Before paragraph 5.3.143 insert new paragraph as follows:</u></p> <p><u>5.3.144. The provision of sufficient living space within new homes is an important element of good housing design. Building to suitable space standards will ensure new homes provide sufficient space for everyday activities. Homes can also be used more flexibly and adapted more easily by their occupants to changing life circumstances.</u></p> <p>Amend paragraph 5.3.143, as follows:</p> <p><u>'Under Criterion E <u>new homes should provide suitable space standards</u> encourages suitable space standards which will ensure new homes provide sufficient space for everyday activities. Homes can also be used more flexibly and adapted more easily by their occupants to changing life circumstances. Subject to viability and /or feasibility the council will expect all new housing to meet at least the following minimum internal floor areas (or any subsequent national space standards) as</u></p>	To ensure the supporting text reflects proposed changes through main modifications to Policy HO9 in regards to internal space standards and consistency with National Planning Policy and the nationally described space standard.	<p>EIA required.</p> <p>This proposed modification to the supporting text reflects the changes to Policy HO9 under MM100.</p> <p>The production of a Housing Design Guide SPD which will address the requirement for homes to be accessible and adaptable is welcomed.</p> <p>This modification has been assessed as part of MM100.</p>

			<p>follows:</p> <p>1 Bed / 2 person dwellings 51 m2</p> <p>n 2 Bed / 3 person dwellings 66m2</p> <p>n 2 Bed / 4 person dwellings 77 m2</p> <p>n 3 Bed / 5 person dwellings 93 m2</p> <p>n 4 Bed / 6 person dwellings 106 m2</p> <p><i>(Floor areas shall be measured in line with RICS Gross Internal Floor Area)</i></p>		
MM107	Page 192	Paragraphs 5.3.144	<p>Insert new paragraphs after paragraph 5.3.143, as follows:</p> <p><u>‘ The Government has developed a national space standard to offer a consistent set of requirements with regard to the size of new homes. The overall objective of this national space standard is to ensure that new homes are highly functional in terms of meeting typical day to day needs at a given level of occupation. The standard is intended to be a minimum standard which developers should exceed where possible.</u></p> <p><u>For residential developments the council will apply the national space standard as a benchmark for assessing the suitability of the proposed space standards of new homes. This will allow particularly small homes to be identified, and where necessary, the council will seek to understand the reasons for any significant variation from the national space standard.</u></p> <p><u>Where feasible and / or viable new homes should meet at least the minimum internal floor areas as set out in the Nationally Described Space Standard (or any subsequent national space standards) ‘</u></p>		<p>EIA required.</p> <p>This proposed modification to the supporting text reflects the changes to Policy HO9 under MM100.</p> <p>The production of a Housing Design Guide SPD which will address the requirement for homes to be accessible and adaptable is welcomed.</p> <p>This modification has been assessed as part of MM100.</p>

			<p>Amend Paragraph 5.3.144 as follows:</p> <p>'If the proposed space standards are below those set out <u>in the nationally described space standard</u> above then the onus will be on applicant to justify why development to these standards cannot be achieved.'</p> <p>Insert new paragraph to follow:</p> <p><u>'The council intend to undertake further detailed work in regards to adopting the national space standard in the District, in accordance with the latest National Planning Practice Guidance, in advance of any policy requirement in the Local Plan.'</u></p>		
MM108	Pages 196 to 197	Policy HO11	<p>Amend criterion C under Policy HO11 as follows:</p> <p>'C. Affordable housing will be required on sites developments of 15 dwelling units or more and on sites over 0.4 hectares in size. The site size threshold is lowered to 5 dwelling units or more in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden, and Cottingley. '</p>	To ensure Policy HO11 is consist with latest National Planning Policy in regards to affordable housing thresholds	<p>EIA not required.</p> <p>The removal of the reference to the site threshold of 0.4 hectares is counteracted in paragraph 5.3.174 which states that Policy "HO11 will be applied to developments which have been manipulated in size (either in area or yield) in an attempt to avoid the provision of affordable homes, or which constitute piecemeal development".</p> <p>In addition, Policy HO5</p>

					'Density of Housing Schemes' is intended to secure the best and most efficient use of land.
MM109	Page 198	Paragraphs 5.3.173 & 5.3.174	<p>Amend paragraph 5.3.173 as follows:</p> <p>The council will seek affordable housing from residential developments in accordance with the stated thresholds and percentages as set out in Policy HO11. Figure HO2 shows the areas that the policy and the thresholds will apply to. This equates the following quotas:</p> <ul style="list-style-type: none"> • Wharfedale up to 30% • Towns, suburbs and villages up to 20% • Inner Bradford and Keighley up to 15% <p><u>Within Wharfedale and the villages listed in Part C of Policy HO11 affordable housing contributions will be required on developments of 5 units or more.</u></p> <p>Amend paragraph 5.3.174 as follows:</p> <p>5.3.174. Irrespective of the thresholds, Policy HO11 will be applied to developments which have been manipulated in size (either in area or yield) in an attempt to avoid the provision of affordable housing, or which constitute piecemeal development. On smaller sites a commuted sum may be appropriate where this is justified by viability issues.</p>	To ensure the supporting text reflects proposed changes through main modifications to Policy HO11 in regards to affordable housing thresholds and is consistent with National Planning Policy.	<p>EIA not required.</p> <p>This proposed modification to the supporting text reflects the changes to Policy HO11 under MM108.</p>
MM110	Pages 200-202	Paragraphs 5.3.179 to 5.3.189	<p>Amend paragraphs 5.3.179 to 5.3.189 as follows:</p> <p>Gypsies, Travellers and Travelling Showpeople</p> <p>5.3.179 It is clearly established within the recently issued national Government guidance <u>contained within 'Planning policy for traveller sites'</u> that the planning system has a crucial role and responsibility to ensure that</p>	The text has been amended to reflect the fact that the Council has now completed an updated Gypsy and Traveller Accommodation Assessment. The old text which described the conclusions of the previous study has therefore been stripped out	<p>EIA required.</p> <p>This proposed modification to the supporting text reflects the changes to Policy HO12 under MM111 below.</p>

<p>MM110 Cont</p>			<p>adequate provision is made for the accommodation needs of travellers. Local planning authorities are required to set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area.</p> <p>5.3.180 The Core Strategy therefore assesses both current supply and future need for accommodation by reference to the <u>recently completed Gypsy and Traveller Accommodation Assessment of July 2015, 2008 West Yorkshire Gypsy and Traveller Accommodation Assessment</u> and provides a framework to ensure that the sites which will be identified in forthcoming DPD's meet <u>in full</u> the needs of the community and are in locations which are accessible to key services and facilities such as education thereby enhancing their quality of life.</p> <p>5.3.181 The Council are currently in the process of commissioning an update to the Accommodation Assessment for Bradford and its conclusions where relevant will be used to update Policy HO12 below.</p> <p>5.3.181 5.3.182 The <u>Bradford Gypsy and Traveller Accommodation Assessment, West Yorkshire Accommodation Assessment, commissioned by the West Yorkshire Housing Partnership, was</u> completed by <u>consultants arc4</u>, has utilised a variety of <u>CRESR (the Centre for Regional Economic and Social Research at Sheffield University) in May 2008. The study is compliant with Government guidance on such studies and used both</u> primary and secondary data and research <u>to assess the scale and type of need including current unmet need, need from households who currently reside in bricks and mortar accommodation, and need resulting from future household growth which is linked to the age structure of current households and finally need for transit accommodation.</u></p>	<p>and replaced with details of the new study. This new study, and therefore the new text, includes revised estimates of the requirement for additional pitches and plots.</p> <p>The table which sets out current supply and future need for new pitches and plots has been updated to reflect the study but also amended to more clearly express the need to provide for transit pitches</p> <p>Revisions are made to the text to indicate that the Council will investigate a number of models for provision of transit accommodation including the negotiated stopping model.</p> <p>Finally revisions are also made to the supporting text to make clear the need to work closely with the community, in particular local representatives of the traveller community in preparing the Local plan and drawing up proposals for site allocations.</p>	<p>Overall this modification, linked to Policy HO12, will have a positive impact upon the protected characteristic group relating to race. Up to date evidence and data has been used inform the policy which will result in the needs of the community being met in full over the lifetime of the Plan.</p> <p>These modifications has been assessed as part of MM111.</p>
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<p>MM110 Cont</p>			<p><u>5.3.182 Based on the results of the Assessment it appears that there will be a need for a range of site types, tenures and locations including both private and public / social provided accommodation. The Council will therefore work closely with local communities in developing the site allocating elements of the Local Plan to ensure that sites and locations are both sustainable and best meet the needs of travellers and showpersons.</u></p> <p><u>5.3.183 Government policy states that Local Planning Authorities should assess the need for transit site accommodation in addition to permanent accommodation. Such provision can support the community's lifestyle by providing temporary places to stop while travelling. Utilising data from past patterns of unauthorised encampments and information from stakeholder and household survey returns, the Gypsy and Traveller Accommodation Assessment has identified the need for 7 transit pitches with total capacity for 14 vehicles / homes. There are a number of models and options for providing for such transit need including that of Negotiated Stopping which is currently used in other parts of the region such as Leeds. The Council will work with local communities and neighbouring authorities to determine the best model and best locations for transit provision.</u></p> <p>5.3.183 The study found that there was already a level of unmet need for accommodation across the sub region with consequent detrimental effects on access to key services. For example, just 41 per cent of Traveller children on the roadside attend school regularly compared to 80 per cent of those on sites and in bricks and mortar housing. While the size of the population has increased the level of authorised provision has not kept pace with this change. This has resulted in a</p>		
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<p>MM110 Cont</p>			<p>myriad of responses – including rising unauthorised encampments, ‘doubling up’ on sites, forced movements into bricks and mortar housing and overcrowding within trailers and caravans. New provision is therefore essential to address the backlog of unmet need and also meet the needs of new forming households and an expanding population.</p> <p>5.3.184 Specifically regarding gypsy and traveller accommodation West Yorkshire has a much higher proportion of socially rented provision (81 per cent) compared to the regional (53 per cent) and national (40 per cent) pictures and contains only a small proportion of private provision (4%).</p> <p>5.3.185 By contrast Travelling Showpeople do not tend to reside on local authority sites. Indeed, virtually all of those households in the survey were resident on Showmen’s yards leased to, or owned by, the Showmen’s Guild or Guild members. Travelling Showpeople also differ from other travelling groups in the sense that their accommodation needs are heavily influenced by their employment practices. They need larger spaces for the storage of heavy machinery and equipment and often need to carry out testing, repairs and maintenance to equipment within their yards.</p> <p>5.3.186 The Assessment found that there was already an acute shortage of accommodation for the travelling showpeople community and stated that the accommodation that did exist was generally of poor quality.</p> <p>5.3.187 In addition to specifying the number of pitches which are required the Assessment also makes a number of important points which are relevant to the type of provision and mechanisms for delivery within</p>		
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<p>MM110 Cont</p>			<p>the District. Firstly based on need generated by patterns of unauthorised encampments the study concludes that there is a sub regional requirement for 19 transit pitches. However there was a lack of support towards the idea of transit sites from both stakeholders and the community with concerns related to the management of such sites. The study suggests that a pragmatic approach to accommodating transient households appears more appropriate. This could include short-term pitches on residential sites, the use of appropriate stopping places and short-term 'doubling up' on the pitch of a relative.</p> <p>5.3.188 Secondly with regards to the ability of communities to make their own provision for sites and facilities there were differing results. Around 45% of Travelling Showpeople who responded to the study questionnaire had some experience of purchasing or pooling land compared to only 6% for other communities. The report suggests that levels of deprivation are higher among gypsy and Irish traveller groups – for these groups the purchase of land is simply not an option. The clear implication is that the local authority and other social housing providers will need to provide or facilitate the majority of accommodation needed for the gypsy and traveller community.</p> <p>5.3.184 5.3.189 Table HO8 sets out the requirement for accommodation in the district based on the results of the study <u>Assessment</u>. The study compares current and planned supply with current unmet need and future need which will result from the growth in households. Similar methodologies were used for assessing the needs of both Travelling Showpeople and Gypsies and Travellers. As the study only covered the period to 2026 Policy HO12 adds further pitches on a pro rata basis equivalent to the 2016-26 rates of the study.</p>		
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MM110
Cont

Table HO8: Pitch and Plot Requirements In Bradford District based on the **Bradford Gypsy & Traveller West Yorkshire Accommodation Assessment 2015 2008**

Delete existing table HO8 and replace with the following table:

<u>Gypsy's and Travellers</u>	<u>Need (2014-19)</u>	<u>82 Pitches</u>
	<u>Supply of authorised pitches</u>	<u>52 pitches</u>
	<u>Shortfall / additional supply needed 2014-19</u>	<u>30 pitches</u>
	<u>Longer Term Need (to 2030)</u>	<u>9 Pitches</u>
	<u>Total Additional Supply Needed</u>	<u>39 pitches</u>
<u>Transit Provision</u>	<u>Total Additional Supply Needed</u>	<u>7 pitches</u>
<u>Showpersons</u>	<u>Need (2014-19)</u>	<u>68 plots</u>
	<u>Supply of authorised plots</u>	<u>36 plots</u>
	<u>Shortfall / additional supply needed</u>	<u>32 plots</u>

				2014-19		
				Longer Term Need (to 2030)	<u>13 plots</u>	
				Total Additional Supply Needed	<u>45 plots</u>	
MM111	Pages 202-203	Policy HO12	<p>Amend Policy HO12 as follows:</p> <p>Policy HO12: Sites For Travellers and Travelling Showpeople</p> <p>A. The Council will make provision via policies and site allocations to deliver at least the following number of additional pitches for Gypsies and Travellers and plots for Travelling Showpeople for the period to 2030 2008-30:</p> <ul style="list-style-type: none"> • <u>39 74</u> pitches for the gypsy and traveller communities; and • <u>7 pitches for transit accommodation</u> • <u>45 22</u> pitches for travelling showpeople <p>B. The Allocations DPD and Shipley & Canal Road AAP will in combination allocate identify sufficient sites to deliver this requirement in sustainable and accessible locations which meet the needs of local communities;</p> <p><u>C. The Council will work closely and constructively with the neighbouring councils, the traveller and showperson’s communities and the settled community to identify the most appropriate sites which will offer locations and accommodation which are both sustainable and meet the needs of the travellers and showpeople;</u></p>	<p>The policy has been amended to reflect the fact that the Council has now completed an updated Gypsy and Traveller Accommodation Assessment which includes revised estimates of the requirement for additional pitches and plots.</p> <p>The changes also reflect representations made and discussions within the EIP hearing session.</p> <p>Changes include:</p> <p>Greater clarification is provided to emphasise that the Council intends the Local Plan to meet the assessed need for pitches and plots in full;</p> <p>A specific entry in Policy HO12 so that it is clear that the Local plan is intending to make provision to meet the need for transit pitches;</p>	<p>EIA required.</p> <p>Overall this modification will have a positive impact upon the protected characteristic group relating to race. Up to date evidence and data has been used inform the policy which will result in the needs of the community being met in full over the lifetime of the Plan.</p>	

MM111			<p>D G. All sites which are developed or proposed for allocation for the gypsy and traveller and travelling showpeople communities should be assessed against criteria relating to:</p> <ul style="list-style-type: none"> • Safe and appropriate access to the highway network; • Whether they are or can be served by utilities or infrastructure; • Whether they are accessible to services, amenities and public transport; • The avoidance of significant adverse affects on the environment and adjacent land uses; and • Incorporating appropriate design and landscaping standards. • Avoiding areas at high risk of flooding; <p>D. Temporary planning permission may be granted for sites where they would help meet local need ahead of the development of permanent sites and where they would accord with the criteria above.</p> <p>E. Consideration will be given to allocating rural exception sites within specific rural settlements in the Allocations DPD and in Neighbourhood Plans where sufficient affordable sites to meet local need cannot otherwise be delivered.</p> <p>F. The criteria for assessing speculative proposals for rural exceptions via planning applications will be set out in the Allocations DPD and will give priority to protecting the most sensitive sites and those areas of land where development would significantly undermine the openness of the green belt.</p>	<p>Revisions to Policy HO12 to make clear the need to work closely with the community, in particular local representatives of the traveller community in preparing the Local plan and drawing up proposals for site allocations;</p> <p>A revision to ensure consistency of wording with Policy HO3 by indicating the need is a minimum (using the phrase ‘at least’);</p> <p>Removal of criterion D following representations made by Leeds GATE. This is because the criteria is unnecessary and could give the unintended and incorrect impression that the Council favoured temporary accommodation as a means to meet need rather than the delivery of new permanent sites.</p>	
MM112	Page 203-204	Policy HO12 Table of outcomes,	Amend the paragraphs as follows:	The changes reflect the production of a new Accommodation Assessment and	EIA required. This proposed modification to the

MM112 Cont	lead roles and paras 5.3.90 and 5.3.91	<table border="1"> <thead> <tr> <th>OUTCOMES</th> <th>INDICATORS</th> <th>TARGETS</th> </tr> </thead> <tbody> <tr> <td>Sufficient new accommodation for Gypsies and Travellers and Travelling Showpeople of the right size, type and tenure has been provided to meet the needs of local communities as set out in the <u>Bradford Gypsy and Traveller Accommodation Assessment West Yorkshire Accommodation Assessment.</u></td> <td> <p>The land supply of sites for Travellers and Travelling Showpeople IND7(H)</p> <p>Annual gross pitch completions – district wide split between G&T pitches and pitches for Travelling Showpeople Operational</p> </td> <td>A deliverable five year land supply of sites for Travellers and Travelling Showpeople</td> </tr> </tbody> </table>	OUTCOMES	INDICATORS	TARGETS	Sufficient new accommodation for Gypsies and Travellers and Travelling Showpeople of the right size, type and tenure has been provided to meet the needs of local communities as set out in the <u>Bradford Gypsy and Traveller Accommodation Assessment West Yorkshire Accommodation Assessment.</u>	<p>The land supply of sites for Travellers and Travelling Showpeople IND7(H)</p> <p>Annual gross pitch completions – district wide split between G&T pitches and pitches for Travelling Showpeople Operational</p>	A deliverable five year land supply of sites for Travellers and Travelling Showpeople	also policy and text changes which emphasise the need to develop the Local Plan and allocate sites in consultation with local community groups and the wider public.	supporting text reflects the changes to Policy HO12. This modification has been assessed as part of MM111.
		OUTCOMES	INDICATORS	TARGETS						
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<table border="1"> <thead> <tr> <th>LEAD ROLES</th> <th>DELIVERY MECHANISMS</th> </tr> </thead> <tbody> <tr> <td> CBMDC Developers – market housing InCommunities Other RSL's – social housing HCA Government <u>Local Community Groups</u> </td> <td> Strategic Policy via Core Strategy Local policy and allocations Householder SPD Development Management Decisions Gypsy & traveller Accommodation Assessment </td> </tr> </tbody> </table>	LEAD ROLES	DELIVERY MECHANISMS	CBMDC Developers – market housing InCommunities Other RSL's – social housing HCA Government <u>Local Community Groups</u>	Strategic Policy via Core Strategy Local policy and allocations Householder SPD Development Management Decisions Gypsy & traveller Accommodation Assessment						
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MM112 Cont			<p><u>including Leeds GATE</u></p>	<p>SHMA AMR</p>		
<p><u>5.3.185</u> 5.3.190 The policy as proposed gives sufficient guidance to other site specific Local Plan documents and could be easily updated should new or updated evidence on accommodation needs be produced in the future. By identifying criteria which could be equally applied to applications for planning permission as for the Local Plan site selection and allocation process, the preferred policy would enable the Council to respond to any proposals for site developments which might come forward in the short term.</p> <p><u>5.3.186</u> 5.3.191 The policy allows for the inclusion within the Local Plan, should the evidence justify it, of rural exception sites and policies.</p>						

Proposed Main Modifications - Section 5.4 Environment

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact assessment Screening Outcome
MM113	Page 210	Policy EN1 Paragraph 5.3.17	<p>Amend paragraph as follows:</p> <p>Data has been collected from surveys about visits to areas of the South Pennine Moors that lie within Bradford. The visitor data relates to key factors such as frequency of visit, timing, access point, range of activities, mode of transport and distance travelled. Once this has been fully analysed, it will help to assess how potential impacts from an increasing number of visitors can be managed and the extent to which alternative areas of natural greenspace can divert pressure to less sensitive areas. <u>An SPD will be produced to identify contributions and secure mitigation measures, in relation to provision of natural greenspace, where this is required to mitigate the effects of increased recreation pressure upon the South Pennine Moors SPA/SAC.</u></p>	In response to issues identified in the HRA Report and advice from Natural England.	EIA not required.
MM114	Page 211	Amend text to policy EN1	<p>Add section between section headed: Provision of Open Space and Recreation Facilities and Local Greenspace.</p> <p>Add new criterion, as follows:</p> <p><u>Mitigating Recreational Pressure on the South Pennine Moors SPA and SAC</u></p> <p><u>C. Residential developments which contribute to recreational pressure upon the South Pennine Moors SPA and SAC will be required to mitigate these effects through provision of new recreational natural</u></p>	In response to issues identified in the HRA Report and advice from Natural England.	EIA not required.

			<u>greenspaces or improvements to existing open spaces.</u>		
MM115	Page 215	Para 5.4.32	<p>Add new text to end of paragraph:</p> <p>‘Policy EN2 seeks to protect biodiversity and geodiversity within the District and to identify principles for enhancing the overall biodiversity resource and stemming losses. It identifies a range of factors that need to be taken into account in identifying potential land for development, in taking into account impacts on the districts biodiversity resource in decision-making and in making an assessment and managing proposals that come forward. <u>One of the most important principles in relation to conserving and enhancing biodiversity identified in the NPPF is that where ‘significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.’ It will therefore only be acceptable to consider compensation as a last resort and under circumstances where this can be carried out in accordance with best practice and guidance, such as that produced by the Chartered Institute of Ecology and Environmental Management.</u>’</p>	To clarify overall approach, following amendments to policy text.	EIA not required.
MM116	Page 220	<p>Policy EN2 Biodiversity and Geodiversity</p> <p>Criterion A North and South Pennine Moors</p>	<p>Amend criterion policy sub title and criterion A, as follows:</p> <p><u>‘The North and South Pennine Moors SPAs and SACs</u></p> <p>A. Any development that would be likely to have a significant effect on a European Site either alone or in combination with other plans or projects will be subject to assessment under the Habitat Regulations at project application stage. If it cannot be ascertained that there will be no adverse effects on site integrity then the project will have to be refused <u>unless the derogation tests of Article 6(4) Habitats Directive can be met.</u>’</p>	For clarification and in response to matters statements from CEG.	EIA not required.

MM117	Page 220	Policy EN2	<p>Insert new criterion B and sub title as follows:</p> <p><u>'Sites of Special Scientific Interest</u></p> <p><u>B Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.'</u></p>	<p>For clarification and in response to the representation from Natural England relating to the publication draft plan.</p>	<p>EIA not required.</p>
MM118	Page 220 - 221	Policy EN2 Criterion B	<p>Amend criterion reflect new Criterion B and amend text as follows:</p> <p>'Locally Designated Sites</p> <p><u>BC.</u> Development likely to have <u>an-direct or indirect</u> adverse effect on a site of ecological/geological importance (SEGIs and RIGS) or a site of local nature conservation value (Bradford Wildlife Areas) will not be permitted unless it can be clearly demonstrated that there are reasons for the proposal which outweigh the need to safeguard the substantive nature conservation value of the site. Proposals that are likely to have an impact on such sites will be assessed according to the following criteria;</p> <ol style="list-style-type: none"> 1. Whether works are necessary for management of the site in the interests of conservation. 2. Whether adequate buffer strips and other <u>appropriate</u> 	<p>In response to input from Natural England and Matters statements from CEG.</p>	<p>EIA not required.</p>

			<p>mitigation <u>measures, which could include adequate buffer strips, have</u> has been incorporated into the proposals to protect species and habitats for which the <u>Locally Designated</u> Site has been designated.</p> <p>3. The development would be expected to result in no overall loss of habitat, <u>through avoidance, adequate mitigation or, as a last resort, the provision of and mitigation could be expected to include</u> compensatory habitats adjacent to or within the vicinity of any losses proposed. Existing habitats and proposed mitigation <u>or compensatory measures</u> should be quantified.'</p>		
MM119	Page 221	Policy EN2 Criterion C	<p>Amend criterion reflect new Criterion B and amend text as follows:</p> <p>'Habitats and Species outside Designated Sites</p> <p><u>C-D</u> Proposals that may have an adverse impact on important habitats and species outside designated sites need to be assessed according to the following criteria:-</p> <ol style="list-style-type: none"> 1. The potential for adverse impact on important/priority habitats that occur outside designated sites 2. The potential for adverse impact on species of international, national and local importance 3. The extent to which appropriate measures to mitigate any potentially harmful impacts can be identified and carried out. <p><u>4 As a last resort, the extent to which appropriate measures to compensate any potentially harmful impacts can be identified and carried out.'</u></p> <p>The assessment needs to take account of: West Yorkshire Site Selection Criteria and Where relevant developers will be expected to submit</p>	In response to matters statements from CEG.	EIA not required.

			<p>(European) Protected Species surveys and other ecological assessment related information with their application.</p> <p>Development which would cause serious fragmentation of habitats, wildlife corridors or have a significantly adverse impact on biodiversity networks or connectivity will be resisted'</p>		
MM120	Page 221	Policy EN2	<p>Amend criterion reflect new Criterion B and amend text as follows</p> <p>'Enhancement</p> <p><u>D E.</u> Plans, policies and proposals should contribute positively towards the overall enhancement of the District's biodiversity resource.</p> <p>They should seek to protect and enhance species of local, national and international importance and to reverse the decline in these species.</p> <p>The Council will seek to promote the creation, expansion and improved management of important habitats within the district and more ecologically connected patchworks of grasslands, woodlands and wetlands. Opportunities for specific habitat creation within development proposals will be sought, including provision for future management.</p> <p><u>The Council will seek to establish coherent ecological networks that are resilient to current and future pressures. Development which would cause serious fragmentation of habitats, wildlife corridors or have a significantly adverse impact on biodiversity networks or connectivity will be resisted.</u></p> <p>Habitats of the moorland will be enhanced and landowners</p>	In response to issues raised by CEG and ensure clarity of policy.	EIA not required.

			<p>or occupiers will be actively encouraged to manage important areas for bird foraging to ensure continued provision of suitable habitat.</p> <p>Where supported by evidence Tthe Council will recognise the importance of foraging/ commuting areas for protected and SPA/SSSI species qualifying features outside the statutory designated area as a material consideration in the preparation of development plans and in the determination of planning applications. Where supported by evidence, foraging sites, currently outside the SPA/SAC and SSSI will be considered for designation as a Locally Designated Site.</p>		
MM121	Page 224	Paragraph 5.4.66	<p>Amend paragraph 5.4.66, as follows:</p> <p>The historic environment faces a number of challenges resulting from minor, incremental alterations to significant and damaging changes which can affect the nature and authenticity of the structure or space. In most cases these changes are controlled by the Council through planning consents; however, <u>some changes which occur are unauthorised and unsympathetic harm to the significance of heritage assets can also occur through neglect, lack of maintenance or small incremental changes which can, over time erode the character of these assets.</u></p>	Clarification on issue of type of unauthorised/unsympathetic development on heritage assets.	EIA not required.
MM122	Page 238	Para 5.4.125	<p>Amend paragraph 5.4.125 as follows:</p> <p>‘The regional study recognised commercial wind as having the potential to make a significant contribution to the renewable energy resource. There are a number of factors that influence a districts capacity to accommodate groups of commercial scale wind turbines; wind speeds, the extent of the urban area and outlying settlements and landscape, environmental and ecological constraints. <u>Two strategic constraints that have an influence on the potential for</u></p>	To update in relation to more recent guidance and ministerial statements in relation to wind turbine development.	EIA not required.

			<p>wind energy in Bradford District were identified in previous work at a regional level; the South Pennine Moors Special Protection Area (also a Special Area of Conservation) and the consultation zone around Leeds/Bradford Airport. The study recognised that further work needed to be done at a district level. <u>National planning guidance identifies in some detail particular planning considerations that relate to wind turbines.</u></p>		
MM123	Page 238	Paragraph 5.4.126	<p>Delete paragraph 5.4.126:</p> <p>‘The findings of the latest regional study provides an evidence base to assist local authorities in developing a strategic approach to renewable and low carbon energy. The study recognised that further work needed to be done at a district level, particularly relating to evaluating the relationship between wind energy, landscape character and the natural environment. There is also a need to consider in association with the airport authority, whether advancements in technology would allow mitigation of the constraints associated with the airport.</p> <p>Replace Paragraph with the following:</p> <p><u>National planning guidance advises that in identifying suitable areas for renewable and low carbon energy ‘local planning authorities will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts.’ The views of local communities likely to be affected are also considered to be important. When identifying suitable areas it is important to set out the factors that will be taken into account when considering individual proposals in these areas, which may be dependent on investigatory work underpinning the identified area. Recent ministerial statements have emphasised the importance of</u></p>	To update in relation to more recent guidance and ministerial statements in relation to wind turbine development.	EIA not required.

			<u>addressing planning impacts identified by affected local communities and the benefits of identifying suitable areas through the plan-making process.</u>		
MM124	Page 239	Paragraph 5.4.127	Amend paragraph 5.4.127 as follows: 'Proposals will need to have an assessment of environmental, economic and social impacts. In relation to environmental impacts, some parts of the upland moorland areas are particularly unspoilt and are valued for tranquillity and wilderness appeal or are of historic importance because of their archaeology or other historic importance. <u>Landscape character areas are supported in national guidance as a tool for assessment.</u> Within Bradford open moorland provides the backdrop to the wide shallow valleys of the rivers Aire and Wharfe, where locations along the moorland edge offer long extensive views. Within such an open landscape, in areas where there are few other structures, vertical elements, such as wind turbines, can be prominent features, whereas smaller scale turbines are less intrusive when viewed in close conjunction with existing built and natural features. <u>West Yorkshire Ecology have produced guidance for ornithological information required to support small wind turbine developments.</u> '	To update in relation to more recent ministerial statements and guidance.	EIA not required.
MM125	Page 239	Policy EN6 Criterion A (1)	Amend criterion A (1) 1. Identifying <u>suitable strategic areas and opportunities for</u> low carbon and renewable energy <u>opportunities.</u>	To update in relation to more recent ministerial statements and guidance.	EIA not required.
MM126	Page 240	Paragraph 5.4.130	Delete paragraph 5.4.130 and renumber subsequent paragraphs: It is recognised that further work still needs to be carried out in order to achieve an assessment of strategic opportunities to secure decentralised energy. This will use as a starting point the recent study of Low Carbon and Renewable Energy Capacity in Yorkshire and the Humber. It will investigate the	To update in relation to more recent ministerial statements and guidance.	EIA not required.

			potential for larger scale low carbon schemes to serve new development and existing communities.		
MM127	Page 240	Policy EN7 Para 5.4.132	<p>Add additional sentence at end of paragraph:</p> <p>‘The overall objectives are to appraise, manage and reduce the risk of flooding. Policy EN7, set out below, identifies principles to guide the process of identifying locations for future development while seeking to reduce flood risk, assess proposals that come forward and adopt a positive approach to water management. <u>The NPPF defines flood risk as: ‘a combination of the probability and the potential consequences of flooding from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.’</u></p>	For clarification in response to document reference PS/F078 produced by Philip Moore and Menston Action Group. This put forward a case for putting greater emphasis on the need to take account of flood risk from all sources including groundwater flooding.	EIA not required.
MM128	Page 242	Policy EN7 Para 5.4.143	<p>Add additional sentence at end of paragraph:</p> <p>‘This approach reflects that in the NPPF, which requires Local Plans to take account of climate change over the longer term and plan new development to avoid increased vulnerability to the range of impacts arising from climate change. The sequential testing approach is supported and Technical Guidance has been produced setting out how this policy should be implemented. Key principles identified are; safeguarding land from development that is required for current and future flood management, using opportunities offered by new development to reduce the causes and impacts of flooding and developing policies to manage flood risk from all sources. <u>When applying sequential testing principles to the choice of sites for future development, where data exists, all sources of flood risk will be taken into account, including those associated with ground water flooding.</u></p>	For clarification in response to document reference PS/F078 produced by Philip Moore and Menston Action Group. This put forward a case for putting greater emphasis on the need to take account of flood risk from all sources including groundwater flooding when carrying out sequential testing.	EIA not required.

MM129	Page 249	Policy EN8 Criterion B	<p>Amend criterion B, as follows:</p> <p>‘Proposals for development of land which may be contaminated or unstable must incorporate appropriate investigation into the quality of the land. Where there is evidence of contamination or instability, remedial measures must be identified to ensure that the development will not pose a risk to human health, public safety and the environment. Investigation of land quality must be carried out in accordance with the principles of best practice.’</p>	For clarification and in response to document reference PS/D003b put forward by the Coal Authority.	EIA not required.
MM130	Page 251	EN8 Insert new paragraph following existing paragraph 4.5.181 and before existing paragraph 4.5.182	<p>Add new paragraph as follows:</p> <p><u>The Council will undertake a programme of modelling to assess the air quality effects of proposed allocations on areas where air quality is a matter of concern, including European Sites designated for nature conservation importance. The programme will assess air quality effects from local roads in the vicinity of proposed allocations on nearby European Sites (including those from increased traffic, construction of new roads and up[grading of existing roads), as recommended in work carried out on Habitats Regulations Assessment. The impacts on vulnerable locations from air quality effects of increased traffic on the wider road network will also be tested using traffic projections and distance criterion. This will be followed by local air quality modelling where required at the pre-allocations testing stage and the development of any mitigation measures required to ensure that there are no adverse effects on the European Sites.</u></p>	In response to issues identified in the HRA Report and advice from Natural England.	EIA not required.

Proposed Main Modifications - Section 5.5 Minerals

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike-through	Reasons for Modification	Equality Impact Assessment Screening Outcome
MM131	Page 255	Policy EN9 Criterion A (3)	Add to end of criterion A (3) before 'and' <u>or to adverse effects on the South Pennine Moors SAC/SPA or important foraging land within the SPA's zone of influence.</u>	Recommended in HRA Report.	EIA not required.
MM132	Page 256	Policy EN9 Criterion B (3)	Add to end of criterion B (3) before 'and' <u>or to adverse effects on the South Pennine Moors SAC/SPA or important foraging land within the SPA's zone of influence.</u>	Recommended in HRA Report.	EIA not required.
MM133	Pages 258 – 259	Paragraph 5.5.14	Insert four new paragraphs to follow paragraph 5.5.13, as follows: <u>5.5.14 The Local Aggregates Assessment for West Yorkshire 2012 (WY LAA) confirms that the sub-region is heavily dependant upon higher specification crushed rock aggregate imports from neighbouring authorities, and in particular Derbyshire and North Yorkshire. Substantial crushed rock aggregate reserves exist within West Yorkshire; however the majority of these reserves do not comprise concreting or road stone grade materials and the quality of the sub-region's stone resources is such that any significant future reduction in the reliance of West Yorkshire on high specification aggregate imports from neighbouring authorities is considered to be unlikely.</u>	Clarification and improved presentation See related minor modification on consequential renumbering of subsequent paragraphs.	EIA not required.

MM133
Cont

Table: TABEN10

West Yorkshire Crushed Rock (CR) Aggregate Landbank Figures				
<u>Estimated CR Consumption 2009 (tonnes)</u>	<u>Estimated CR Imports from Neighbouring Authorities 2009 (tonnes)</u>	<u>Ten Year Average Annual CR Sales (2003-2012) (tonnes)</u>	<u>CR Reserves as of 31 Dec 2012 (tonnes)</u>	<u>Landbank (Reserves/ Avg Sales)</u>
2,330,000	1,499,505	1,000,000	28,500,000	28.5 Years

Note: Above Figures are taken from The Local Aggregate Assessment for West Yorkshire 2012, wherein full details of how these figures have been derived can be found.

5.5.15 The landbank calculation set out in the LAA, as repeated in table TABEN10 above, represents a calculation of the length of time it would take to exhaust current permitted reserves of Crushed Rock within West Yorkshire if average annual sales continue at historic average levels. However the fact that this figure is in excess of the 10 year minimum recommended within the NPPF in no way implies that sufficient crushed rock reserves exist within West Yorkshire to meet West Yorkshire's construction aggregate needs. In fact the figures set out in the WY LAA imply that the level of aggregate product within West Yorkshire could satisfy, at most, 40% of demand, with imports from neighbouring authorities estimated to be almost 50% higher than indigenous production.

5.5.16 In order to secure continuity of supply of crushed rock the West Yorkshire Authorities have engaged with neighbouring authorities, in particular Derbyshire and North Yorkshire, through the Aggregates Working Party and

			<p><u>through the production of the WYLAA. This has resulted in the adoption of LAAs by those neighbouring authorities which provide for the continuation of levels of extraction which are sufficient to allow for the continued supply of aggregates into West Yorkshire.</u></p> <p><u>5.5.17 Although Bradford is not a significant aggregate producer the small quantities of crushed sandstone aggregate by-product which are produced do contribute towards redressing the trade imbalance highlighted above and absorbing some local demand for lower specification bulk aggregates and building sand. Therefore, notwithstanding the fact that the West Yorkshire landbank calculated in the 2012 WYLAA (based upon historic average sales) is substantially in excess of the 10 year minimum it is considered inappropriate to adopt a strongly negative policy position towards the extraction of crushed rock aggregates in the District.</u></p>		
MM134	pages 263 – 264	Paragraph 5.5.20	<p>Delete paragraph 5.5.20 and replace with four new paragraphs, as follows:</p> <p>5.5.20 Research undertaken at a regional level and the emerging Local Aggregates Assessments of neighbouring authorities have identified a potential future shortfall in meeting the demand for sand and gravel within West Yorkshire from local land-won extraction. Therefore policy EN11 confirms the Council's commitment to taking any appropriate opportunities to contribute towards the provision of a 7 year sand and gravel landbank level within West Yorkshire by supporting sand and gravel extraction within an area of search constrained by specified environmental criteria.</p>	<p>Clarification and improved presentation.</p> <p>See related minor modification on consequential renumbering of subsequent paragraphs.</p>	EIA not required.

MM134
Cont.

5.5.20 The Local Aggregates Assessment for West Yorkshire 2012 (WYLAA) identifies that the sub-region is heavily dependant upon sand and gravel imports from neighbouring authorities, and in particular 18 March 2015 North Yorkshire. Very limited sand and gravel reserves exist within West Yorkshire, with only two relatively small sites reported in the WYLAA (located in Kirklees and Wakefield), possessing reserves totalling 1.6 million tonnes. No reserves of sand and gravel exist within the Bradford District. British Geological Survey (BGS) resource maps indicate that some potentially viable sand and gravel resources may remain within West Yorkshire, including river terrace deposits along the Wharfe and Aire Valleys in the Bradford District. However previous BGS research has identified minerals extraction industry scepticism that the remaining resource would be economically viable to exploit due to the constrained nature of the remaining deposits.

MM134
Cont.

Table: TABEN11

West Yorkshire Sand and Gravel (S&G) Landbank Figures				
<u>Estimated S&G Consumption 2009 (tonnes)</u>	<u>Estimated S&G Imports from Neighbouring Authorities 2009 (tonnes)</u>	<u>Ten Year Average Annual S&G Sales (2003-2012) (tonnes)</u>	<u>S&G Reserves as of 31 Dec 2012 (tonnes)</u>	<u>Landbank (Reserves/ Avg Sales)</u>
810,000	490,000	130,000	1,600,000	12.3 Years

Note: Above Figures are taken from The Local Aggregate Assessment for West Yorkshire 2012, wherein full details of how these figures have been derived can be found.

5.5.21 The landbank calculation set out in the LAA, as repeated in table TABEN11 above, represents a calculation of the length of time it would take to exhaust current permitted reserves of Sand and Gravel within West Yorkshire if average annual sales continue at historic average levels. However the fact that this figure is in excess of the 7 year minimum recommended within the NPPF in no way implies that sufficient sand and gravel reserves exist within West Yorkshire to meet West Yorkshire's construction aggregate needs. In fact the figures set out in the WY LAA imply that West Yorkshire historic production could satisfy, at most, 16% of demand, with imports from neighbouring authorities estimated to be almost 4 times higher than indigenous production.

5.5.22 In order to secure continuity of supply of sand and gravel the West Yorkshire Authorities have engaged with neighbouring authorities, in particularly Derbyshire and North Yorkshire, through the Aggregates Working Party and through the production of the WYLAA. This has

MM134 Cont.			<p><u>resulted in the adoption of LAAs by those neighbouring authorities which provide for the continuation of levels of extraction which are sufficient to allow for the continued supply of aggregates into West Yorkshire.</u></p> <p><u>5.5.23 Notwithstanding the fact that the West Yorkshire landbank calculated in the 2012 LAA, based upon historic average sales, is in excess of the 7 year minimum, given West Yorkshire's reliance on 18 March 2015 imports from neighbouring authorities, it is considered inappropriate and unsustainable to adopt a policy position that would not be supportive of any environmentally acceptable proposals for the extraction of sand and gravel resources within the District which may come forward within the plan period. Therefore policy EN11 is supportive in principle of proposals for sand and gravel extraction, within an area of search constrained by specified environmental criteria, except in the unlikely event that the LAA indicates that no additional permitted reserves of sand and gravel are required.</u></p>		
MM135	Pages 263 – 265	Policy EN11 criterion D (1) and D (2)	<p>Amend section title as follows:</p> <p>'Section Title: Sand, Gravel, Fireclay, <u>Coal</u> and Hydrocarbons <u>(oil & gas)</u>'</p> <p>Amend Policy Title as follows:</p> <p>'Policy Title: Policy EN11: Sand, Gravel, Fireclay, <u>Coal</u> and Hydrocarbons <u>(oil & gas)</u>'</p>	Clarification and improved presentation	EIA not required.

MM135		<p>Amend criterion D1 and D2 as follows:</p> <p>'D.1. Proposals associated with the exploration and appraisal of hydrocarbons (oil or & gas) resources will be supported in principle providing that the proposal accords with other policies within the Local Development Plan and all of the following criteria are met:</p> <ol style="list-style-type: none"> 1. Any sites where intrusive exploration or appraisal works are to take place are sited so as to minimise adverse impacts on people or the environment, whilst allowing for the effective exploration and appraisal of the potential oil or gas resource, and; 2. Adequate evidence has been provided that the operations and infrastructure associated with the exploration or appraisal activities will not lead to unacceptable adverse impacts on people or the environment or that any such adverse impacts will be adequately mitigated, and; 3. Any boreholes intended to be capable of being reused for production in the future are sited in locations which can accommodate the scale of infrastructure and mitigation which would be necessary at the production stage, and; 4. Proposals are included to restore the areas of land affected by the exploration or appraisal activities to a condition which provides for the maintenance or enhancement of the ecological, landscape and/ or amenity value of the site in the event that planning permission is not subsequently granted for these areas of land to be used for production. <p>D.2. Proposals for the commercial production of hydrocarbons (oil or & gas) will be supported in principle</p>		
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MM135 Cont			<p>providing that the proposal accords with other policies within the Local Development Plan and all of the following criteria are met:</p> <ol style="list-style-type: none"> 1. A full appraisal programme for the oil or gas resource proposed to be exploited has been completed which demonstrates that a viable oil or gas resource exists of a sufficient size to justify the environmental, social and economic costs associated with its extraction, and; 2. The proposed production site is in the most sustainable viable location taking account of the proximity of sensitive environmental, human and cultural receptors, transportation distances, infrastructure requirements and the benefits of efficiently exploiting the identified oil and gas deposit, and; 3. Adequate evidence has been provided that the operations and infrastructure necessary for the exploitation of the oil or gas resource will not lead to unacceptable adverse impacts on people or the environment or that any such adverse impacts will be adequately mitigated, and; 4. Proposals are included to restore the areas of land affected by the production activities and associated infrastructure to a condition which provides for the maintenance or enhancement of the ecological, landscape and/ or amenity value of the site once production has ceased.' 		
MM136	Page 264	Policy EN11 Criterion C	<p>Amend criterion C as follows:</p> <p>'C. Proposals for coal extraction will not be permitted unless the coal resource would otherwise be sterilised by another form of development or all of the following criteria are met:</p>	<p>Clarification: deletion of a criterion which relates to a routine minerals Development Management Process (establishing the quality and quantity of the mineral proposed to be extracted) to remove any doubt regarding the policy's</p>	<p>EIA not required.</p>

MM136 Cont			<p>1. Any viable fireclay resources will also be recovered, and;</p> <p>2. The applicant can demonstrate that the quality of the coal resource proposed to be extracted is such that it is suitable for use as an energy mineral, and;</p> <p>3. <u>2.</u> One of the following circumstances applies:</p> <p>i. The proposals are environmentally acceptable, or can be made so by planning conditions or obligations, or;</p> <p>ii. The proposal provides national, local or community benefits which clearly outweigh the likely impacts of the development'</p>	consistency with the NPPF	
MM137	Page 270	Policy EN12 Criterion B (4)	<p>Amend criterion B (4) as follows:</p> <p>4. The applicant has demonstrated that non of the sandstone resource beneath the site could be extracted without prejudicing the development of the site <u>due to ground level or engineering issues, or;</u></p>	Clarification in terms of the scope of the situations where sandstone safeguarding would not apply.	EIA not required.

Proposed Main Modifications - Section 5.6 Waste

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Overview
MM138	Page 276	Policy WM1 paragraphs 5.6.1 – 5.6.3	<p>Amend paragraphs 5.6.1 to 5.6.3, as follows:</p> <p>Waste is often seen as a by-product of living, to be disposed of by the cheapest possible method. Bradford has traditionally been reliant upon sending waste to landfill sites outside the District and there is limited <u>waste management infrastructure to deal with waste within the Bradford District to deal with certain types of waste, in particular Local Authority Collected Waste (LACW) and Commercial and Industrial Waste</u> by any other means.</p> <p>However, the policy direction for waste management is changing has changed over the years. The European Waste Framework Directive 2008 requires appropriate measures to prevent or reduce of waste production and its harmfulness and secondly the recovery of waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials, or the use of waste as a source of energy.</p> <p>This European guidance is subsequently delegated to a national level through the Waste (England and Wales) Regulations 2011, <u>National Planning Policy for Waste (NPPW) Oct 2014 and the Waste Management Plan for England Dec 2013, and planning policy Statement 10,</u> National Planning Policy for Waste (NPPW) Oct 2014 and the Waste Management Plan for England Dec 2013, which set out how England will meet the European directives on waste and deliver a shift towards a more sustainable management of waste at a local level.</p> <p>In an effort to achieve greater sustainability and <u>net</u> self</p>	Factual updates.	EIA not required.

MM138 Cont			<p>sufficiency, the current approach to waste management is no longer acceptable needs to improve and change further. It is essential that greater emphasis is placed on avoiding waste production and managing waste produced in the most sustainable way, making use of waste as a resource and only disposing of the residue that has no value.</p> <p>And amend paragraph 5.6.7, as follows:</p> <p>Policy WM1 creates a strategic planning framework to minimise the negative effects of the generation and management of waste on human health and the environment. It further states that waste policy should encourage a reduced use of resources, and favours the practical application of the waste hierarchy. One of the primary mechanisms of applying this application is the delivery of an adequate range of waste management facilities to ensure waste is treated and disposed of in a sustainable and environmentally acceptable way, balancing the economic, social and environmental needs of the District. A range of new facilities shall be needed to deal with tonnages of Commercial and Industrial (C&I) and Solid Municipal Waste (MSW – Council collected waste) Local Authority Collected Waste (LACW) arisings.</p>		
MM139	Page 276	Policy WM1 Paras 5.6.8 – 5.6.14	<p>Insert new text setting and sub section title to follow paragraph 5.6.9, as follows:</p> <p><u>Evidence</u></p> <p><u>5.6.9 Information relating to the specific details of this evidence base can be found within the Waste Management DPD and the supporting Waste Needs Assessment, Capacity Gap Analysis and Requirement Study (2014).</u></p>	To enhance the strategic framework and spatial direction for the Waste Management DPD.	<p>EIA not required.</p> <p>The Waste Management DPD will be the subject of a separate EIA.</p>

MM139
Cont

WASTE ARISING - CURRENT POSITION

5.6.10 The future scale of waste arisings and the waste management facilities which need to be planned for in Bradford District is critical. This section considers the need for new waste management facilities.

5.6.11 Analysis is based on the Council's Waste Data Forecasting Model. For a full explanation of the methodology and sources used to calculate waste arisings and forecasts please refer to Bradford Waste Needs Assessment, Capacity Gap Analysis and Requirement Study.

5.6.12 The majority of current waste arisings within Bradford District come from Commercial and Industrial Waste (C&I), Construction, Demolition and Excavation Waste (CDEW) and Local Authority Collected Waste (LACW) which combined equate to just under ¾ of the total arisings. Agricultural waste has increased significantly from previous figures, mainly due to the new legislation coming into force in 2010. Table 1 sets out the current waste arisings for Bradford.

Table 1: Summary Total Waste Arisings in Bradford (2012)

<u>Type of Waste Arising</u>	<u>Arisings (Tonnes)</u>	<u>%</u>
<u>Agricultural Waste</u>	<u>283,132</u>	<u>20.20</u>
<u>Commercial Waste</u>	<u>254,314</u>	<u>18.20</u>

MM139 Cont		<table border="1"> <tr> <td><u>Construction Demolition and Excavation</u></td> <td><u>350,000</u></td> <td><u>25.02</u></td> </tr> <tr> <td><u>Hazardous Waste</u></td> <td><u>19,155</u></td> <td><u>1.37</u></td> </tr> <tr> <td><u>Local Authority (Including Calderdale)</u></td> <td><u>272, 668</u></td> <td><u>19.50</u></td> </tr> <tr> <td><u>Total***</u></td> <td><u>1,399,042</u></td> <td><u>100</u></td> </tr> <tr> <td><u>Waste Water**</u></td> <td><u>1,024,568</u></td> <td></td> </tr> </table> <p><u>Source: Environment Agency Waste Data Interrogator (WDI) 2012*.</u></p> <p><u>Yorkshire Water 2014**.</u></p> <p><u>Total Being Planned for in the Waste Management DPD through either planning policy or site allocations or a combination of both***</u></p>	<u>Construction Demolition and Excavation</u>	<u>350,000</u>	<u>25.02</u>	<u>Hazardous Waste</u>	<u>19,155</u>	<u>1.37</u>	<u>Local Authority (Including Calderdale)</u>	<u>272, 668</u>	<u>19.50</u>	<u>Total***</u>	<u>1,399,042</u>	<u>100</u>	<u>Waste Water**</u>	<u>1,024,568</u>					
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<u>Waste Water**</u>	<u>1,024,568</u>																				
	<p><u>5.6.13 The projected forecast waste arisings for Bradford District draws on the most reliable and robust data available for each waste stream. The Council are taking forward a 'Growth' based scenario, which follows a growth rate of 33% estimated Gross Value Added (GVA) for all the waste streams of Commercial, Industrial, Agricultural, CDEW and Hazardous. A separate growth rate has been applied to Local Authority Collected Waste to ensure alignment with the Municipal Waste Strategy, and zero static growth rate applied to Agricultural waste.</u></p>																				
	<p><u>Table 2: Forecast Waste Arisings in Bradford (2013–30) using Bradford Waste Forecasting Model</u></p> <table border="1"> <thead> <tr> <th><u>Waste Stream</u></th> <th><u>2013</u></th> <th><u>2018</u></th> <th><u>2022</u></th> <th><u>2026</u></th> <th><u>2030</u></th> </tr> </thead> <tbody> <tr> <td><u>Agricultural Waste*</u></td> <td><u>283,133</u></td> <td><u>283,133</u></td> <td><u>283,133</u></td> <td><u>283,133</u></td> <td><u>283,133</u></td> </tr> <tr> <td><u>Commercial and Industrial Waste*</u></td> <td><u>513,830</u></td> <td><u>538,326</u></td> <td><u>558,882</u></td> <td><u>580,329</u></td> <td><u>602,721</u></td> </tr> </tbody> </table>	<u>Waste Stream</u>	<u>2013</u>	<u>2018</u>	<u>2022</u>	<u>2026</u>	<u>2030</u>	<u>Agricultural Waste*</u>	<u>283,133</u>	<u>283,133</u>	<u>283,133</u>	<u>283,133</u>	<u>283,133</u>	<u>Commercial and Industrial Waste*</u>	<u>513,830</u>	<u>538,326</u>	<u>558,882</u>	<u>580,329</u>	<u>602,721</u>		
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MM139 Cont									
			<u>CDEW*</u>	<u>447,604</u>	<u>461,194</u>	<u>472,360</u>	<u>483,800</u>	<u>495,515</u>	
			<u>Hazardous Waste</u>	<u>19,153</u>	<u>19,764</u>	<u>20,267</u>	<u>20,782</u>	<u>21,311</u>	
			<u>Local Authority Collected Waste**</u>	<u>306,148</u>	<u>338,736</u>	<u>358,179</u>	<u>369,852</u>	<u>381,188</u>	
			<u>Total Tonnes</u>	<u>1,569,868</u>	<u>1,641,153</u>	<u>1,692,821</u>	<u>1,737,896</u>	<u>1,783,868</u>	
<p><u>Source: *Bradford Council Waste Data Forecasting Model, **Bradford Council Waste Strategy Team</u></p>									
			<p><u>5.6.14. While these levels should be planned for in terms of the provision of expanded and new facilities, the Waste Management DPD policies will also ensure that opportunities to reduce, re-use and recycle waste will be maximised and that some flexibility and contingency in the levels of future waste management facilities provision will be made on a, monitor and manage basis.</u></p>						

MM139 Cont					
MM140	Page 276	Paragraph 5.6.8	<p>Insert new paragraphs to follow from new paragraph 5.6.14 above, as follows:</p> <p><u>CROSS-BOUNDARY WORKING</u></p> <p><u>5.6.15 The Local Plan must give consideration to cross-boundary issues when setting spatial policy and waste management allocations.</u></p> <p><u>5.6.16 Bradford Council will continue to work collaboratively with neighbouring local authorities and other local authorities where waste import / export relationships exist now and are recognised to likely continue in to the future recognising the importance of the duty to cooperate in achieving net self sufficiency for Bradford. This will ensure a collaborative cross-boundary approach to waste management is established and maintained. In addition to the continued active participation in the Yorkshire and Humber Waste Technical Advisory Body, the Council will:</u></p> <ul style="list-style-type: none"> • <u>Share with neighbouring authorities and statutory bodies all relevant information, data and its analysis relating to current and future waste arisings across all waste streams, technologies and performance in reducing, re-using, recycling and</u> 	To enhance the strategic framework and spatial direction for the Waste Management DPD.	<p>EIA not required.</p> <p>The Waste Management DPD will be the subject of a separate EIA.</p>

MM140 Cont			<p><u>disposing of waste;</u></p> <ul style="list-style-type: none"> • <u>Work collaboratively on emerging Local Plans and their future updates where appropriate and practical;</u> • <u>Provide comment on waste related planning applications where appropriate to do so;</u> • <u>Support the commissioning of joint monitoring reviews, data updates and specific waste related studies to support regional and sub-regional waste management and future policy development where appropriate and practical.</u> <p><u>Attend and contribute to any groups, bodies or meetings to support cross boundary working on waste.'</u></p>		
MM141	Page 277	Policy WM1 supporting text	<p>Insert new paragraphs and section title to follow from new paragraph 5.6.16 above, as follows:</p> <p><u>'Policy WM1</u></p> <p><u>5.6.17 There is a need to consider how waste management policy developed within the Local Plan can deliver against the Core Strategy objectives and those within the Waste Management DPD. This includes the extent to which it is suitable to apply a waste management hierarchy within future policy.</u></p> <p><u>5.6.18 Policies WM1 and WM2 establish the strategic framework and spatial direction for managing waste in the Bradford District. The strategy will</u></p>	To enhance the strategic framework and spatial direction for the Waste Management DPD.	<p>EIA not required.</p> <p>The Waste Management DPD will be the subject of a separate EIA.</p>

			<u>be implemented through more detailed policies and related documents as set out in the Waste Management DPD, which also shows specifically how sufficient capacity has been identified and assessed to meet the waste forecasts.'</u>		
MM142	Page 277	Policy WM1	<p>Amend Policy WM1 as follows:</p> <p>'Policy WM1: Waste Management</p> <p>A. The Council will work with its partners and neighbouring authorities to integrate strategies for waste management in Bradford and at the sub-regional and regional levels. All forms of waste will be managed in accordance with the <u>principles of the</u> waste management hierarchy in the following order of priority :</p> <p>1. Waste prevention: avoiding the creation of waste in the first instance; then</p> <p>2. <u>Preparing for</u> Re-use: making best use of existing and new facilities; then</p> <p>3. Recycling and composting; making best use of existing and new facilities; then</p> <p>4. <u>Energy</u> Other recovery: making use of technologies that recover energy from waste; then</p> <p>5. Disposal: including the use of landfill as a last alternative.</p>	To enhance the strategic framework and spatial direction for the Waste Management DPD.	EIA not required. The Waste Management DPD will be the subject of a separate EIA.

MM142 Cont			<p>B. The Council will plan to ensure that sufficient capacity is located within the District to accommodate for the most sustainable and environmentally effective management of-forecast waste arisings of all types of waste,-reducing the reliance on other authority areas. In identifying waste management sites within the District the Council will give regard to cross boundary issues, including waste movement and location of facilities in adjacent areas; <u>working collaboratively with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management and allow the District to become net self-sufficient.</u></p>		
MM143	Page 277	Policy WM1 Supporting text	<p>Insert new paragraphs after policy MW1, as follows:</p> <p><u>5.6.19 The Council's primary delivery mechanism for Policy WM1 will be the allocation of land for an adequate range of waste management facilities through the Waste Management DPD. This should be provided to ensure that waste is treated and disposed of in a sustainable and environmentally acceptable way, balancing the economic, social and environmental needs of the District.</u></p> <p><u>5.6.20 The Waste Management DPD will also put forward a number of planning policies to support the delivery of allocated and unallocated waste management sites, and safe guard any existing waste management infrastructure vital to the delivery the waste hierarchy.</u></p> <p><u>5.6.21 The Municipal Waste Strategy (and subsequent updates) will also dictate how the Council will directly contribute towards moving waste up the hierarchy through future waste operations.</u></p>	To enhance the strategic framework and spatial direction for the Waste Management DPD.	<p>EIA not required.</p> <p>The Waste Management DPD will be the subject of a separate EIA.</p>

MM144	Page 277	Policy WM1 Supporting text	<p>Add new sub section heading and paragraphs following new paragraph 5.5.21 above as follows:</p> <p><u>IDENTIFYING WASTE MANAGEMENT SITES</u></p> <p><u>5.6.22 European and national policy relating to forward planning for waste management requires Waste Planning Authorities to consider the most appropriate locations for waste facilities in the future. This should include the relationship of the site with the waste arisings, minimising the movement of waste, and also the consideration of the potential impact of waste management facilities on their surrounding environs. Consideration is given to the need to identify sites for the principal waste streams</u></p> <ul style="list-style-type: none"> • <u>LACW – sites will be identified for this waste stream, as the evidence base demonstrates a shortfall in a range of waste management facilities.</u> • <u>Commercial and Industrial – sites will be identified for this waste stream, as the evidence base demonstrates a shortfall in a range of waste management facilities.</u> • <u>CDEW - there are number of existing sites transferring and managing this waste stream. On site recycling upon demolition and development will be encouraged to move management of this waste up the hierarchy. Sites will not be specifically identified for this waste</u> 	To enhance the strategic framework and spatial direction for the Waste Management DPD.	<p>EIA not required.</p> <p>The Waste Management DPD will be the subject of a separate EIA.</p>
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¹ Memorandum of Understanding/Minutes/Agreements – Yorkshire and Humber Waste Technical Advisory Body

<p>MM144 Cont</p>			<p><u>stream.</u></p> <ul style="list-style-type: none"> • <u>Agricultural – the majority of this waste stream will be managed within farm holdings, small amounts of ‘specialised’ agricultural waste can be managed at C&I facilities. Future waste arisings are identified in the evidence base as being very small, therefore this stream will continue on farm holdings, existing sites and identified C&I sites.</u> • <u>Hazardous & Low Level Radioactive waste – Both these waste streams generate very low levels of waste arisings. Such low levels do not quantify the allocation of further sites specifically for the management of these waste types, the economies of scale are such that the provision of sites within the Plan area for the very small quantities of arising’s would be unlikely to be viable.</u> • <u>Residual Waste for Final Disposal (i.e. Landfill) - the existing sub-regional and regional capacity does not quantify the allocation of a site for a new landfill for the disposal of residual waste following treatment¹.</u> <p><u>5.6.23 Bradford Council will only be seeking to allocate Waste Management Facilities for the treatment of Local Authority Collected Waste (LACW) and Commercial and Industrial Waste. This strategic approach is based on the following factors:</u></p> <ul style="list-style-type: none"> • <u>LACW and C&I are consider priority waste streams;</u> 		
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MM144
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- Need to reduce biodegradable waste not being managed;
- Sites will be large scale and of strategic importance;
- Waste arisings are of a sufficient scale to allow the delivery of viability facilities;
- Other waste streams are capable of being managed 'on-site';
- Treating other waste streams at facilities with the sub-region / region is the most sustainable and environmentally effective approach.

5.6.24 Through the Waste Needs Assessment, Capacity Gap Analysis and Requirement Study (2014), it has been identified that there is a capacity gap in the waste management facilities based on the current and future waste arisings.

5.6.25 Table 3 establishes the current capacity gap, within the Bradford District applying the Growth Scenario with maximised recycling based on the Waste Needs Assessment Capacity Gap Analysis and Requirement Study (2014). This existing capacity gap will be reviewed and updated (if necessary) through the Waste Management DPD. The Waste Management DPD will also assess the future capacity gap for the plan period, ensuring the sufficient allocation of appropriate sites over the plan period.

¹ Memorandum of Understanding/Minutes/Agreements – Yorkshire and Humber Waste Technical Advisory Body - [Footnote]

MM144
Cont

Table 3 – Existing Waste Management Capacity Gap (tonnes)

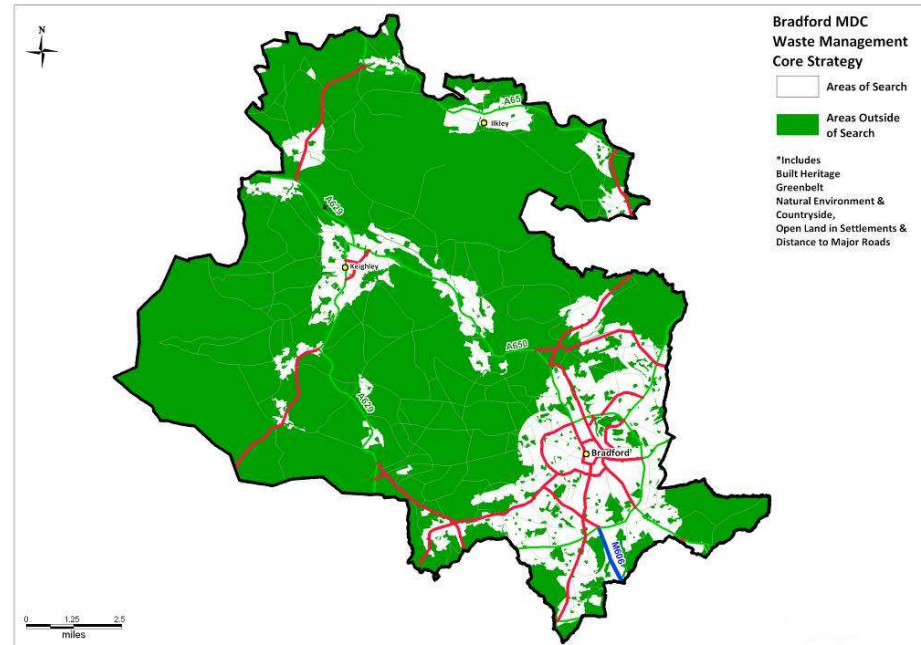
<u>Waste Management</u>	<u>Existing Capacity Gap (Tonnes)</u>
<u>Landfill (non-hazardous)</u>	<u>59,439</u>
<u>Landfill (hazardous)</u>	<u>74</u>
<u>Landfill (CD&E)</u>	<u>201,200</u>
<u>Energy recovery (LACW & C&I)</u>	<u>203,169</u>
<u>Incineration (Specialist High Temp)</u>	<u>833</u>
<u>Recycling (C&I and LACW)</u>	<u>400,084</u>
<u>Recycling (aggregates CD&E)</u>	<u>112,975</u>
<u>Recycling (specialist materials– including metal recycling, End of Life Vehicles and WEEE)</u>	<u>-1,059</u>
<u>Composting</u>	<u>34,340</u>
<u>Residual Mechanical Treatment</u>	<u>109,146</u>
<u>Treatment Plant (including Anaerobic Digestion, specialised treatment of biodegradable liquids and wastes, organic waste treatment by distillation)</u>	<u>-52,376</u>

MM145	Page 278	Policy WM2 & supporting text	<p><u>Amend policy WM2 and supporting text as follows:</u></p> <p><u>5.6.26 Policy WM2 establishes the principles of identifying appropriate locations for waste management facilities, establishing a strategic framework for the Waste Management DPD to allocate enough land for recycling and treatment to take place, to ensure that less waste goes to landfill.</u></p> <p>Policy WM2: Waste Management</p> <p>A. Sites for waste management facilities will be identified to deal with all Municipal Solid Waste (MSW) <u>Local Authority Collected Waste (LACW)</u> and Commercial & Industrial Waste (C&I) arisings within Bradford District. Sites will need to best meet environmental, economic and social needs.</p> <p>B. In identifying and selecting sites for the management of waste, an Area of Search (See Appendix 7) is established as the framework for identifying sites for new and expanded waste management facilities. Within the Area of Search, the following order of priority will be adopted:</p> <ol style="list-style-type: none"> 1. The expansion and co-location of waste facilities on existing, operational sites; 2. Established and proposed employment and industrial sites where modern facilities can be appropriately developed; 3. Other previously developed land within the Area of Search, including mineral extraction and landfill sites; 	To enhance the strategic framework and spatial direction for the Waste Management DPD.	<p>EIA not required.</p> <p>The Waste Management DPD will be the subject of a separate EIA.</p>
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MM145 Cont			<p>4. Greenfield, previously undeveloped sites within the Area of Search;</p> <p>5. Sites within the Green Belt</p> <p>C. All potential waste management sites will be subject to detailed assessment of their individual characteristics, <u>cumulative impact, economic viability and the impacts of and the implications of</u> any waste development on surrounding areas. The Waste Management DPD will establish the detailed site development criteria using a similar approach to site identification as applied within the development of strategic <u>and local</u> criteria to include consideration of:</p> <p>1. Policy alignment;</p> <p>2. Physical constraints to site development;</p> <p>3. Proximity to waste arisings;</p> <p>4. Adjacent uses.'</p>		
MM146	Page 279	Policy WM2 supporting text	<p>New Supporting text to follow WM2, as follows:</p> <p><u>5.6.27 Figure WM1 illustrates the Area of Search – including the application of the Green Belt as a constraint (i.e. the Area of Search excluding areas within the Green Belt)</u></p>	To enhance the strategic framework and spatial direction for the Waste Management DPD and to avoid detrimental impacts on the natural environment including the South Pennine Moors SPA/SAC.	EIA not required.

MM146
Cont

Figure WM1 – Identified Area of Search



5.6.28 **The Council is of the opinion that taking into account the proximity of facilities to major settlements is a key factor in providing a network of facilities to ensure waste can be disposed of and Local Authority Collected Waste can be recovered in one of the nearest appropriate installations. By limiting the area of search to major settlements within the District, the Council is of the opinion the 'proximity principle' is fully embedded into the policy.**

5.6.29 **The need to avoid detrimental impacts upon the natural environment and countryside, built**

<p>MM146 Cont</p>			<p><u>heritage, open land within settlements, adverse impacts on the South Pennine Moors SAC/SPA and important foraging land within the SPA's zone of influence and a proximity to 1km of major roads is also considered to be compliant with the latest national guidance set out in the National Planning Policy for Waste when identifying suitable sites and areas for proposed waste management facilities</u></p> <p>5.6.30 <u>Further information on the site identification and assessment can be found in the Waste Management DPD and the supporting Site Assessment Report.</u></p> <p>Delete paragraphs 5.6.9 and 5.6.10:</p> <p>Policies WM1 and WM2 set in place the principles of identifying appropriate locations for waste management facilities. These principles are key to ensuring much needed waste management infrastructure is delivered in the most sustainable and effective way for the treatment of waste and the avoidance of potential negative impacts.</p> <p>Policies WM1 and WM2 provide the strategic framework for developing the detailed policies in the Waste Management DPD of the Local Plan to achieve sustainable waste management. It will be consistent with the latest national policy guidance and will make provision for the forecast waste tonnages identified within the supporting Evidence Base Report. It will set out a detailed planning strategy and include criteria-based development management policies, as well as sites for new waste management facilities. These will include sites for Municipal Solid Waste and Commercial and Industrial Waste.</p>		
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Proposed Main Modifications - Section 5.7 Design

No main modifications

Proposed Main Modifications - Section 6 Implementation and Delivery

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Outcome
MM147	Page 302	Paragraph 6.23	Add to 'the sorts of matters for which planning obligations will be sought' the following additional point: <u>mitigation for impacts to the South Pennine Moors SPA/SAC.</u>	Recommended in HRA Report to assist in delivering mitigation measures.	EIA not required.
MM148	Page 303	Paragraph 6.26	Add additional sentence at end of paragraph 6.26, as follows: <u>A management and mitigation strategy and SPD will be produced which will set out a framework for delivering mitigation measures in relation to impacts on the South Pennine Moors SPA/SAC.</u>	Recommended in HRA Report to assist in delivering mitigation measures.	EIA not required.

Proposed Main Modifications - Section 7 Monitoring

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Outcome
MM149	Page 313	Table MO1. Target for Indicator IND1(EJ)	Annual delivery of 2897 <u>1600</u> jobs.	Consequential upon modifications MM66 and MM67 to Policy EC2.	EIA not required. This amendment has been assessed under Policy EC1.

Proposed Main Modifications – Section Appendices

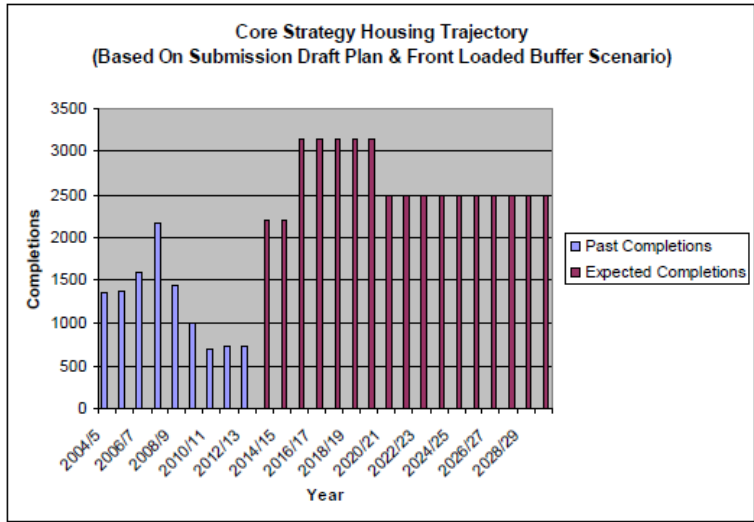
Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Outcome
MM150	Page 348	Appendix 4: Parking Standards	<p>Insert the following definition:</p> <p><u>Minimal Operational Requirement: Parking that is required for a development to operate as set out in the Transport Assessment or Transport Statement, including but not exclusively; Operational parking space for commercial and service vehicles (that provides for manoeuvring space to enable the largest vehicle required to exit the site in forward gear); loading bays and disabled parking. Residential development that requires operational parking, such as residential or care homes, should, as far as possible, make provision within the site. This encompasses servicing, business visitors and employees who require daily access to their vehicles for their jobs. It does not include commuter parking</u>”.</p>	Provision of a definition of minimal operational parking standard to provide clarity to the standards.	EIA not required. The inclusion of a definition provides clarity for everyone who will refer to these parking standards.
MM151	Page 349	Appendix 4: Parking Standards	<p>Amend standard in relation to C3 City and Town centres as follows:</p> <p>C3 Dwellings (City and Town Centres) – Average of 4 space per unit</p> <p>C3 Dwellings (City and Town Centres) – <u>Average of 4 space per unit minimal operational requirements</u></p>	Brings standard for residential developments in line with other types of city and town centre development. In response to emerging evidence from City Centre AAP transport study and development of City Centre Parking Strategy.	EIA not required.
MM152	Page 356	Appendix 6 Paragraphs 1.3 to 1.5	<p>Amend the text as follows:</p> <p>‘The Housing Trajectory and Previously Developed Land</p>	To more fully reflect the NPPF, NPPG, representations made and the EIP hearings.	EIA not required.

<p>MM152 Cont</p>		<p>Scenarios</p> <p>1.3 Paragraph 47 of the NPPF states that Local Planning Authorities should illustrate the expected rate of housing delivery through a housing trajectory covering the plan period. Previous supplementary guidance to PPS3 set out details on housing trajectories and since the Government are yet to finalise the range of technical guidance which will support the NPPF that guidance has, as with the CSFED, been used in the production of the updated housing trajectory in this appendix.</p> <p>1.4 Housing trajectories support the 'plan, monitor and manage' approach to housing delivery by showing past and estimating indicating future performance by considering past rates of housing completions and projected completions to the end of the specified Local Plan period. Housing trajectories are normally developed as part of the supporting evidence base underpinning LDF production but once established they are used to monitor performance and are updated annually via the production of the Council's Annual Monitoring Report. The trajectories are not however policies.</p> <p>1.5 The housing trajectory included at the end of this section has been based on the following elements:</p> <ul style="list-style-type: none"> • Actual completions over the period 2004-13 as assessed and set out within previous Annual Monitoring Reports. These years comprise a period when the overall housing market was initially in a buoyant state and also when there was strong delivery on windfall sites particularly within Bradford City Centre but within which there has been a subsequent period comprising a deep and unprecedented slump in the housing market. Both supply and demand has been severely impacted by recession, toxic debt and its 		
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<p>MM152 Cont</p>			<p>effect on global and national credit, severely restricted mortgage lending to prospective house buyers and severely restricted borrowing to the construction industry</p> <p>reducing its capacity to start new schemes or complete existing ones.</p> <p>• <u>Projected completions over the plan period based on Policy HO1 and under an assumption of both significantly improved land supply and significantly improved economic and housing market conditions.</u> Estimated performance over the next few years, within which the effects of the recession are expected to linger and recovery is expected to be sluggish. It is important to stress that while housing completions in some parts of the country are showing signs of increase there is yet to be any significant pick up in completions within Bradford district. A cautious approach has therefore been taken in estimating completions over the first part of the plan period, because of the likely weak state of the local housing market and economy, severe restrictions on public sector spending and also because it will be some years before work on the Local Plan is sufficiently progressed to produce a significant increase to the available land supply.</p> <p>• The housing distribution strategy and settlement hierarchy set out within the Core Strategy and embedded within the Spatial Option. This envisages that delivery will be stimulated by a number of master planning initiatives which will deliver housing growth in different areas at different times. These <u>will result in</u> major injections into both the land supply and into investment and delivery. <u>will not be spread out evenly over the whole plan period, because of the work necessary to bring them to fruition, to put the necessary infrastructure in place, and to bring forward and test the relevant Development Plan Documents. The combined result of these factors means that the delivery profile within Bradford will be</u></p>		
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<p>MM152 Cont</p>			<p>heavily weighted towards the middle and particularly the final phase of the plan period. This will provide a major challenge to house builders as development activity rates over recent years have been substantially below the sort of levels needed to deliver the Core Strategy annual housing requirement of 2200.</p> <p>• The production of a Strategic Housing Land Availability Assessment and examination of its results – although it has a significant and important role to play, the SHLAA delivery trajectory cannot be simply transplanted into the housing trajectory in this chapter. This is because the SHLAA has taken</p> <p>a ‘local policy off’ approach and much of the supply within it is dependent on changes to the statutory development plan. The SHLAA supply is also larger than the housing requirement. The SHLAA has however assisted production of both the policies of the Core Strategy and this appendix by providing a detailed profile of the land supply, including how it is distributed both geographically and by type – for example whether green field or previously developed, and whether deliverable in the short term or longer term. The SHLAA has therefore enabled realistic alternative options to be assessed and can shine a light on the preferred option in terms of its implications in terms of existing</p> <p>planning designations and the challenges of overcoming site related constraints. The SHLAA has also provided input into the creation of realistic but challenging targets for delivery on brownfield land.</p> <p>• Scenario building table 1 (overleaf) has attempted, based on the elements above, to set out the scenarios which will show how overall housing completions and the percentage of delivery on PDL will vary across the plan period. This in turn feeds into the risk analysis at the end of this appendix.</p>		
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MM152 Cont			<p><u>The components making up the housing trajectory chart are as follows:</u></p> <ul style="list-style-type: none"> • <u>Net housing completions 2004-13</u> • <u>Basic Policy HO1 housing target of 2,200 new homes per annum</u> • <u>NPPF 20% buffer for years 1-5 of 440 dwellings</u> • <u>Backlog of unmet need resolved over the 15 year plan period (7,687 dwellings in total) †</u> 		
MM153	Page 358	Table 1: Scenarios for Delivery	Delete Table 1 in its entirety.	Table no longer required or relevant given other changes including to the trajectory.	EIA not required.
MM154	Page 359-360	Table 2 & Housing Trajectory Charts	Delete Table 2 and delete the 2 housing trajectory diagrams and replace with the following housing trajectory chart:	Changes to reflect NPPF, representations made, the EIP hearings, and the general need to meet housing requirement provide for any backlog of unmet need as soon as possible.	EIA not required.



MM155	Page 361	Appendix 6, paragraph 1.6	<p>Amend paragraph 1.6, as follows:</p> <p>'1.6 The Council has a program for the delivery of statutory development plan documents which will be fundamental to the delivery of the envisaged housing growth as set out above. This is because the plan making process for the LDF needs to facilitate a massive step change in housing delivery which cannot be met either by the existing land supply or by the existing planning framework. Key decisions have to be made which have to be tested via extensive public engagements and by examination in public. The DPD's involved are:</p> <ul style="list-style-type: none"> • The Shipley and Canal Road Corridor DPD - The Shipley and Canal Road Corridor is located within the main urban area of Bradford between the city centre and Shipley town centre. In support of Bradford's regeneration priorities it is one of the key locations identified to deliver housing and economic growth in the district. Up to 3200 3,100 new homes are planned to be located in the CRC and the area has been identified as one of four Urban Eco Settlements in the Leeds City Region. In line with the sub area policies in the Core Strategy, the AAP will set out planning policies to guide development proposals in the area, along with details of how these proposals will be delivered. Issues and Options stage consultation took place between March and May 2013 with plan adoption expected in 2016. • The Bradford City Centre Area Action Plan DPD - The City Centre AAP will set the vision and spatial strategy in support of the regeneration of Bradford City Centre. It will provide the statutory basis for the implementation of the City Centre Masterplan and associated four Neighborhood Development Frameworks and help deliver developments on the identified sites and in areas of change and constraint. Up to 3500 new homes are planned to be delivered within the City Centre during the plan period. Public consultation on the City 	<p>Modifications are proposed to reflect the proposed revised settlement distribution and to reflect the fact that the district wide housing target is a minima.</p>	<p>EIA not required.</p> <p>Proposed modifications assessed under HO3.</p>
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MM155 Cont			<p>Centre AAP Further Issues and Options took place between March and May 2013 with adoption expected in 2016.</p> <ul style="list-style-type: none"> • The Allocations Development Plan Document - this DPD will cover all other areas of the district outside of the 2 area action plans and will set out the approach to housing and employment development, the green belt, and the provision for sport and formal and informal recreational and open space. It will bring forward land allocations within the majority of the Bradford urban area, within the Principal Towns of Keighley, Ilkley and Bingley, together with the local growth centres and local service centres. Issues and Options stage consultation is scheduled for late 2014.' 		
MM156	Page 365	Appendix 6, Table 3	<p>Modify the following text within the first line of the 'scenario':</p> <p><u>If the PDL delivery falls to levels which threaten the delivery of the targets and objectives set out within Policy HO6 consistently (for more than 3 consecutive years) and significantly below the expected levels as set out in the scenarios above and Policy HO6:</u></p> <ul style="list-style-type: none"> • The Council will consider intervention measures to assist the delivery of PDL sites including – land assembly by assisting occupiers to find alternative sites, bringing forward Council owners land, and use of CPO powers. • The Council will advance previously developed sites into the 5 year supply 	<p>The amendment has been made to reflect the fact that there is no longer a requirement within Government Guidance for the Core Strategy to contain a brownfield trajectory and that there is no specific year in year brownfield targets within the Plan. Targets for development on previously developed land are specified for the plan period as a whole. However the scenarios within the appendix set out how the Council expects delivery on such brownfield sites to change as the new Local Plan is prepared and as market conditions change and improve. Regular monitoring will therefore allow the Council to assess whether the overall targets as set out in Policy HO6 are on course to be delivered and take action to stimulate and increase delivery accordingly.</p>	EIA not required.

Proposed Additional Modifications – General

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Outcome
AM1	All	All	Renumber paragraphs to reflect deletions and additional new paragraphs inserted under main modifications	Consequential amendment	EIA not required.

Proposed Additional Modifications – Section 1 Background

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Outcome
AM2	Page Vi and Vii	List of Tables and Figures	Update list of Tables and Figures as a consequence of changes under main modifications	Several main modifications amend or introduce new tables and figures.	EIA not required.

Proposed Additional Modifications - Section 2 Background

No additional modifications

Proposed Additional Modifications – Section 3 Vision, Objectives and Core Policies

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike-through	Reasons for Modification	Equality Impact Assessment Screening Outcome
AM3	Page 29	Section 3 Spatial Vision Figure SS1	Remove the train symbols off the stations in the Worth Valley Railway routes as these stations do not form part of the Transport Authority Network (total of 3 rail symbols located on diagram near to Haworth)	Leaving the symbols on the WVR suggests incorrectly that they form part of the network. Removing them will avoid any misunderstandings.	EIA not required.
AM4	Page 66	Key diagram Location strategy	Page 66 Remove Proposed Quality Bus Corridors symbol from diagram (3 individual purple dashed lines). Page 67 Remove Proposed Quality Bus Corridors from Key	Factual update. Transport Policies now state that we are making improvements to all bus routes in the district and therefore there is no need to single out the bus routes shown on the key diagram. One of the routes shown from Thornton to Cottingley is now not an option and therefore is misleading in its own right.	EIA not required.
AM5	Page 67	Key Diagram	On key amend entry for Growth Areas (Policy HO2) as follows: ' Growth Areas (Policy HO2) - City Centre, Shipley and Canal Road Corridor, Silsden, <u>S. E. Bradford</u> , Steeton with Eastburn, Thornton, Queensbury'	Factual correctness	EIA not required.
AM6	Page 67	Key Diagram	On key amend entry for economic Growth Areas as follows: 'Economic Growth Area (Policy SC4 <u>EC1</u>)'	Factual clarification	EIA not required.

Proposed Additional Modifications – Section 4 Sub Area Policies

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Outcome
AM7	Page 76	Section 4,1 Figure BD1	Delete ' Thornton & Queensbury ' from the key as these are located in the Pennine Towns & Villages sub area.	Factual correctness	EIA not required.
AM8	Page 76	Section 4,1 Figure BD1	Include the Growth Area symbol to the key	Factual correctness	EIA not required.
AM9	Page 76	Section 4.1 Figure BD1	Include ' <u>UNESCO Saltaire World Heritage Site</u> ' within the key reference the meaning of the red star at Saltaire.	Factual correctness	EIA not required.
AM10	Page 77	Paragraph 4.1.6	Add new paragraph to follow 4.1.6 and renumber subsequent paragraph). New paragraph as follows: <u>4.1.7 Heritage-led regeneration initiatives have secured a sustainable future for the historic buildings of the City Centre, especially in Little Germany and Goitside, and the re-sue of these buildings has contributed towards meeting the needs for offices and new homes in the City Centre.</u>	Clarification on role and contribution of heritage in the sub area.	EIA not required.
AM11	Page 97	Policy PN1 Criterion E and F	Amend criterion E and F to follow correct alphabetical order, as follows: ' E <u>D</u> ENVIRONMENT' And ' F <u>E</u> TRANSPORT	Factual correctness	EIA not required.
AM12	Page 98	Section 4.4 Figure PN1	Within the key include a heading for ' Growth Areas ' with Queensbury & Thornton beneath. Plus add Growth Area symbol to map.	Factual correctness	EIA not required.

AM13	Page 99	Paragraph 4.4.3	<p>In paragraph 4.4.3. add after 'and television productions':</p> <p><u>'The success of Haworth has also helped to increase the numbers of visitors to the other heritage assets along the Airedale corridor.'</u></p>	Clarification on role of heritage assets.	EIA not required.
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Proposed Additional Modifications – Section 5.1 Economy and Jobs

No additional modifications

Proposed Additional Modifications – Section 5.2 Transport and Movement

No additional modifications

Proposed Additional Modifications – Section 5.3 Housing

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Outcome
AM14	Page 152	Paragraph 5.3.3	<p>Amend paragraph 5.3.3, as follows:</p> <p>'The Council is currently revising its District Housing Strategy. The intention is that the policies and approach of this section compliments, supports and delivers the vision and key objectives of the emerging Housing and Homelessness Strategy for Bradford as outlined below:'</p>	The strategy has now been completed and approved by the Council.	EIA not required.
AM15	Page 154	Paragraph 5.3.6	<p>Amend paragraph 5.3.6, as follows:</p> <p>'The key evidence which has underpinned this section of the Core Strategy and which will be outlined in more detail below includes:</p> <ul style="list-style-type: none"> • The Bradford District Housing Requirement Study (February 2013), and Addendum Report (August 2013), <u>and Updated Demographic Analysis & Forecasts September 2014;</u> • The Bradford District Strategic Housing Market Assessment (SHMA) 2010 and SHMA Update 2013; • The Bradford District Strategic Housing Land Availability Assessment (SHLAA) October 2011 and SHLAA Update May 2013; • The Bradford District Affordable Housing Economic Viability Assessment (AHEVA) 2011 <u>and</u> • <u>The</u> Local Plan Viability Assessment 2013 <u>and Update (December 2014)'</u> 	To reflect the further evidence base work produced since the CDPD was drafted.	EIA not required.

AM16	Pages 159 -160	Table HO2	Under 'PDL / Greenfield' heading, amend 'green' to <u>Greenfield</u>	Factual correctness	EIA not required.
AM17	Page 164	Paragraph 5.3.43	Amend the second sentence as follows: 'The use and articulation of a settlement hierarchy in guiding and controlling the distribution of growth and development is a tool already used and established within both the RUDP and the recently revoked RSS.'	Factual correctness. RSS was revoked in February 2013.	EIA not required.
AM18	Page 168	Paragraph 5.3.50	Amend the first sentence as follows: 'The updated SHLAA provides data on not only the total deliverable and developable capacity within each settlement but also the nature of that supply including the split between green field <u>greenfield</u> and brownfield land and the amount of green belt. '	Consistent use of term.	EIA not required.
AM19	Page 166	Paragraph 5.3.51	Amend as follows; ' 2. Growth Study <u>Bradford Growth Assessment</u> The Growth Study <u>Bradford Growth Assessment</u> provides a strategic level assessment of which parts of the district would be capable of and most suitable for accommodating growth in the form of urban extensions or local green belt deletions'	Correct title for study.	EIA not required.
AM20	Page 167	Paragraph 5.3.53	Amend paragraph as follows: 'The settlement distribution contained within Policy HO3 therefore reflects the results of this work and the <u>potential</u> need to avoid or minimise direct and indirect affects on these <u>any</u> key areas.'	To more accurately reflect the revised HRA.	EIA not required.

AM21	Page 184	Paragraph 5.3.107	<p>Amend paragraph as follows:</p> <p>'Families account for nearly half <u>a third</u> of the households across the district'</p>	Factual correctness	EIA not required.
AM22	Page 200	Paragraph 5.3.176	<p>Amend paragraph as follows:</p> <p>'The economic viability and circumstances of individual sites will be taken account of in the determination of the affordable housing contribution being sought. Where an applicant can provide evidence that a site would be unviable if affordable housing targets are required then the exact amount of affordable housing, or financial contribution, to be delivered will be determined by economic viability having regard to individual site and current market conditions. In such cases the council will expect a full development appraisal to be submitted for validation as set out in Policy ID2.'</p>	Correction to provide correct wording.	EIA not required.

Proposed Additional Modifications – Section 5.4 Environment

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Outcome
AM23	Page 211	Policy EN1	Under heading 'Provision of Open Space and Recreation Facilities' First sentence, first letter amend C to B	To correct typing error	EIA not required.
AM24	Page 224	Paragraph 5.4.67	Amend paragraph as follows: Additionally there are further challenges for the historic environment as the District faces significant development pressures over the plan period until 2030 particularly in the urban areas. It is essential that the Core Strategy through Policy EN3 provides a positive strategy for the conservation and enjoyment of the historic environment whilst achieving the Government's core objective since protecting and enhancing the historic environment is one of the Government's core objectives in the promotion of sustainable development.	Clarification of wording linked to NPPF.	EIA not required.
AM25	Page 225	Policy EN3 Criterion D	Amend criterion D, as follows: D. Where possible the original use of a listed building should be retained or continued. Where this is no longer viable or appropriate or where without an alternative use the listed building will be seriously at risk, the Council will grant permission for an alternative use if it can be demonstrated that: 1. The alternative use is compatible with and will preserve the character of the building and its setting.	Correction wording to ensure clarity.	EIA not required.

			2. No other reasonable alternative exists which would safeguard the character of the building and its setting.		
AM26	Page 225	Policy EN3 Criterion E	Amend criterion E first line, as follows: 'E. That t The alteration, extension or substantial demolition of a listed building will only be permitted if it can be demonstrated that the proposal.'		EIA not required.
AM27	Page 227	Paragraph 5.4.73	Move sub section title 'Designated Heritage Assets' to before paragraph 5.4.73	Correction	EIA not required.
AM28	Page 229	Paragraph 5.4.79	Amend paragraph, as follows: 'The link between regeneration and the built historic environment is strong and the two are not mutually exclusive. Criterion H recognises the important role the historic environment can play in regeneration schemes. There have been a number of successful schemes in recent years, particularly in the city centre and principal towns. Whilst heritage related focused regeneration opportunities need to be realised must be encouraged, sensitive restoration and re-use schemes that respect historic assets are essential in some areas of heritage assets for the specific benefit of their significance must also be supported.'	Improving presentation	EIA not required.
AM29	Page 232	Policy EN4 Landscape A bullet point 3	Bullet point 3 to read 'Esholt'. Insert as bullet point 4, on next line 'Tong Valley'.	Correctness	EIA not required.

AM30	232	Policy EN4 Landscape B lines 11 and 12	Add the word 'and' to last sentence to read: In circumstances where impacts can be managed and the degree of change made acceptable, contributions need to relate to the scale of the project under consideration; and the significance of any assets affected.'	Correctness	EIA not required.
AM31	247-252	Paragraphs 4.5.168 – 4.5.182	Amend paragraph numbering to 4. 4 .XXX	Correctness	EIA not required.

Proposed Additional Modifications – Section 5.5 Minerals

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Outcome
AM32	Page 255	Policy EN9, Criterion A)2)	Amend criterion A (2) line 3 as follows: '... to amenity, the setting of heritage assets <u>or their setting,</u> or <u>harm</u> the character...'	Correction and improved presentation	EIA not required.
AM33	Page 256	Policy EN9, Criterion B (2)	Amend criterion B (2) line 3 as follows: '...to amenity, the setting of heritage assets <u>or their settings,</u> or <u>harm</u> the character...'	Correction and improved presentation	EIA not required.

Proposed Additional Modifications – Section 5.6 Waste Management

No additional modifications

Proposed Additional Modifications – Section 5.7 Design

No additional modifications

Proposed Additional Modifications – Section 6 Implementation

No additional modifications

Proposed Additional Modifications – Section 7 Monitoring

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Outcome
AM34	Page 314	Table MO1	Amend table MO1 Housing Target IND(H) target as follows: For HO6 <u>maximising previously developed land</u> . Targets as set out in Policy HO6.	Clarification and presentation	EIA not required.

Proposed Additional Modifications – Section Appendices

Mod No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through	Reasons for Modification	Equality Impact Assessment Screening Outcome
AM35	Page 328	Glossary	Add new entry as follows: <u>Housing trajectory: This provides a position statement comparing past performance on housing supply with planned future rates of housing development.</u>	Factual correctness	EIA not required.

AM36	Page 329	Glossary	Amend entry as follows: 'Local Infrastructure Plan (LIP): This study sets out the current position of infrastructure provision in the District, along with an identification of the key agencies/partners, their investment programmes and infrastructure commitments, along with any key issues for the Core Strategy. This study forms part of the <u>LDF Local Plan</u> evidence base.'	Factual correctness	EIA not required.
AM37	Page 331	Glossary	Add following new entry: <u>Regional Econometric Model (REM): The Regional Econometric Model provides economic and labour market estimates and forecasts for the UK, Yorkshire & the Humber region (Y&H), local authority districts and city regions within Y&H.</u>	Factual correctness	EIA not required.
AM38	Page 340	Appendix 2A	Amend waste policy references to reflect correct policy number deleting EN14 and replacing with WM2.	Factual correction	EIA not required.

**APPENDIX 2 -
Equality Impact Assessment Form**

Reference –

Department	Regeneration Planning Service	Version no	V1
Assessed by	Emma Higgins	Date created	20 Nov 2015
Approved by	Andrew Marshall	Date approved	23 Nov 2015
Updated by		Date updated	
Final approval		Date signed off	

Section 1: What is being assessed?

1.1 Name of proposal to be assessed:

Bradford District Local Plan – Core Strategy Development Plan Document (DPD) - Proposed Main Modifications to the Core Strategy Publication Draft (2014)

1.2 Describe the proposal under assessment and what change it would result in if implemented:

The Core Strategy sets out a spatial vision for land use across the Bradford District until 2030, setting out strategic policies to guide the delivery of development, prioritising sustainable development in planning for population growth, economic prosperity, social equality, securing regeneration and planning for infrastructure whilst maintaining, protecting and enhancing environmental quality and respecting local character and distinctiveness.

If implemented, or adopted, the Core Strategy would become the statutory development plan for the District, thus replacing the current Replacement Unitary Development Plan (RUDP) (Adopted October 2005).

The Core Strategy is a statutory document which must be approved by an independent Planning Inspector before it can be formally adopted by the Council. Once adopted, it would enable the Council to determine planning applications for development in line with an up-to-date development plan which is supported by a range of evidence base concerning the District and its population.

The Core Strategy Publication Draft was approved by Full Council in December 2014 and was submitted to Government for examination. The Publication Draft was supported by an initial Equalities Impact Assessment. Following initial hearings as part of the examination, a limited set of modifications are being proposed to the

Publication Draft version in order to make the plan 'sound' and capable of adoption. This assessment related to these set of proposed modifications and should be read in conjunction with the full Equalities Impact Assessment of the Publication Draft.

Section 2: What the impact of the proposal is likely to be

The Equality Act 2010 requires the Council to have due regard to the need to-

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups

2.1 Will this proposal advance equality of opportunity for people who share a protected characteristic and/or foster good relations between people who share a protected characteristic and those that do not? If yes, please explain further.

By its very nature, the Core Strategy will affect everyone in the Bradford District, either directly or indirectly as it seeks to guide how land use development will take place over the next 10-15 years until 2030.

The Plan seeks to create the right environment whereby homes can be built in the right places and the right time; that there is an appropriate mix of housing with high quality design and a range of affordable housing to allow everyone to gain access onto the housing ladder.

The Plan also seeks to create an environment whereby businesses actively want to invest in, thus boosting job creation and job opportunities for residents. It aims to create the right conditions whereby development can take place, whilst also protecting its unique natural and built heritage environment across the District.

The Core Strategy contains policies, particularly in relation to housing, which will provide an equality of opportunity for all people who share a protected characteristic group. In particular, the following policies will directly advance the equality of opportunity for all groups:-

- Policy HO9 - 'Housing Quality' aims to deliver high quality homes that meet the districts needs and sets out the quality that is expected. The policy sets out the need and requirements for accessible and easily adaptable homes and space standards which will support the changing needs of families and individuals over their lifetime, including people with disabilities.
- Policy HO11 – 'Affordable Housing' aims to ensure that a sufficient supply of good quality affordable housing is delivered to meet the affordable housing needs of the District, thus having a positive impact on those people or families living on a low wage/income.

- Policy HO12 – ‘Sites for Travellers and Travelling Showpeople’ aims to ensure that the needs of this community are met with the provision of permanent sites in sustainable locations and with the necessary facilities.

2.2 Will this proposal have a positive impact and help to eliminate discrimination and harassment against, or the victimisation of people who share a protected characteristic? If yes, please explain further.

Yes. The Core Strategy is likely to have an indirect positive impact upon everyone in the District, including people who share a protected characteristic, as it seeks to ensure that over the next 10-15 years there are the right amount of homes – type, size and design, in the right locations as well as helping to create increased job opportunities within the District.

The inclusion of a policy for the provision of sites for gypsies, travellers and travelling show people will directly help to eliminate discrimination, harassment and victimisation of this protected characteristic group relating to ‘race’. The provision of allocated sites and pitches through Policy HO11 for travellers and travelling showpeople will have a positive impact for this community wishing to visit and live within the District.

2.3 Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.

The detailed Equality Impact Assessments which have been undertaken on the Core Strategy throughout its policy preparation has concluded that there are no identified negative or disproportionate impacts to any protected characteristic groups.

2.4 Please indicate the level of negative impact on each of the protected characteristics?

(Please indicate high (H), medium (M), low (L), no effect (N) for each)

Protected Characteristics:	Impact (H, M, L, N)
Age	N
Disability	N
Gender reassignment	N
Race	N
Religion/Belief	N
Pregnancy and maternity	N
Sexual Orientation	N
Sex	N

Marriage and civil partnership	N
Additional Consideration:	
Low income/low wage	N

2.5 How could the disproportionate negative impacts be mitigated or eliminated?

Not applicable

Section 3: What evidence you have used?

3.1 What evidence do you hold to back up this assessment?

The initial Equality Impact Assessment of the Publication Draft provided a baseline analysis of the characteristics of the population of the Bradford District. A range of data was used, including Census Data, demographic data and local studies such as 'Understanding Bradford District'. A full list of evidence used can be found in Section 4 of the Publication Draft Equality Impact Assessment and within Table 1 of the Proposed Modifications Equality Impact Assessment of the Core Strategy.

In addition, the Core Strategy is required to be underpinned by up-to-date and proportionate evidence for it to be considered to be a sound Plan by a Planning Inspector at Examination. The evidence base which has informed the Core Strategy and thus this assessment include the following:

- Affordable Housing Economic Viability Assessment
- Bradford District Employment Land Review & update
- Bradford District Growth Assessment
- Bradford District Housing Requirements Study
- Bradford District Retail and Leisure Study
- Core Strategy Baseline Analysis Study
- District Wide Transport Study
- Gypsy and Traveller Accommodation Assessment
- Local Plan Infrastructure Plan
- Local Plan Viability Assessment
- Open Space, Sport and Recreation Study
- Settlement Study
- Strategic Flood Risk Assessment
- Strategic Housing Market Assessments
- Strategic Housing Land Available Assessments

The Core Strategy has also been the subject of the following 'impact' assessments during its preparation:

- Sustainability Appraisal
- Strategic Environmental Assessment

- Habitats Regulations Assessments
- Equality Impact Assessments
- Health Impact Assessment & review

3.2 Do you need further evidence?

Each of the Development Plan Documents which form part of the Local Plan, including the Core Strategy, will be monitored annually and be reported in an Annual Monitoring Report (AMR).

Each policy within the Core Strategy is supported by identified outcomes, indicators and targets. This monitoring process allows the Council to collect specific data on an annual basis in order to analyse trends over a period of time to assess the impact of the implementation of a policy and if the Council is achieving the aims and objectives of the Plan.

The monitoring process will provide invaluable evidence to demonstrate if there are, or may potentially be, any unforeseen issues which may have an unintentional disproportionate impact upon any protected characteristic group. Should this be the case then these impacts will be identified and mitigation of those impacts be addressed.

Section 4: Consultation Feedback

4.1 Results from any previous consultations

The Local Plan Core Strategy has been in preparation since 2004-2005. During this time has been issued for public consultation four times and again during its Examination on the proposed modifications.

An Equality Impact Assessment was initially undertaken at the Further Engagement Draft (2011) and Publication Draft (2014) stages alongside the policy formation at that time. During each consultation stage an Equality Impact Assessment report was published for comment alongside the main consultation documents.

The Council received no representations in relation to the EqIA from either the Further Engagement Draft or Publication Draft consultations.

Details of these consultations are available in the relevant Engagement Plan and a Statement of Pre-Submission Consultation reports for each consultation stage.

4.2 Feedback from current consultation

The initial Equality Impact Assessment was prepared with input from a Core Strategy Equality Working Group which was made up of internal Council officers who had experience of working with protected characteristic groups within the

District. Detailed discussions during the policy formulation phase enabled any potential equality implications to be flagged up at the early stage to minimise the potential impact of the Plan on equality groups.

The Council did not receive any responses to the Equality Impact assessment from any of the public consultation stages.

4.3 Your departmental response to this feedback – include any changes made to the proposal as a result of the feedback

Feedback from the Equality Working Group was passed onto Planning Officers to make the necessary amendments to improve the outcomes or impact of the policy on equality groups.