

MATTER 7D: ENVIRONMENT

Policy EN3 Is the approach to preserving, protecting and enhancing the character, appearance, archaeological and historic value and significance of the District’s designated and undesignated heritage assets and their settings fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

I Introduction

- 1.1 Paragraph 126 of the NPPF requires Local Plans to set a positive strategy for the conservation and enjoyment of the historic environment of their area. It helpfully sets out the types of considerations which the Government considers those preparing such plans would need to take into account.
- 1.2 With the exception of those elements identified in Section 7, below, for the most part the Submission Draft of the Core Strategy does set out an appropriate Policy framework for the management of rich heritage of Bradford. However, certain aspects of the Plan appear likely to result in development which would harm some of the District’s most important designated heritage assets. In these areas, the Council has not satisfactorily demonstrated that the proposals are capable of being delivered in a manner which is consistent with, either, the core planning principles for the historic environment set out in the NPPF or the Plan’s own policies for the conservation of its heritage assets.
- 1.3 Taken as a whole, therefore, it is English Heritage’s view that, by virtue of these particular proposals, the document does not provide the positive strategy for the conservation of the historic environment that is required by national policy guidance.
- 1.3 The areas of the Plan which are of particular concern are as follows:-
- (a) The level of growth proposed for Baildon could harm elements which contribute towards the Outstanding Universal Value of the **World Heritage Site at Saltaire**. Several of the sites identified in the Council’s SHLAA are located in areas which have been identified as being critical to the setting of the World Heritage Site.
 - (b) The Holm Wood Urban Extension is likely to affect the setting of the **Registered Battlefield at Adwalton**. Although the Council has produced a *Heritage Impact Assessment*, it provides little evaluation of the likely impact which this development might have upon the Battlefield or what

mitigation measures would be necessary to ensure that the significance of this important designated heritage asset is safeguarded.

- (c) The level of growth proposed for **Haworth** could harm elements which contribute towards its character and landscape setting. The margin of flexibility between the total amount of housing identified in the SHLAA and the figure given for Haworth in the Core Strategy does not appear to be sufficient to have confidence that the level of housing proposed can be delivered in a manner which is consistent with the conservation of the settlement's historic environment.

2 The heritage assets of the Plan area

2.1 Bradford has a significant legacy of important historic buildings and features. These include:-

- **The World Heritage Site at Saltaire** (one of only two in Yorkshire) is considered to be the finest and most complete example in England of an integrated mill and associated village.
- A nationally-significant industrial heritage relating to the **textile industry**. This includes **Manningham** (which is dominated by the unique campanile chimney stack of Manningham Mills and the bulky mass of its Italianate process buildings) and **Little Germany** (a fine example of a nineteenth-Century merchant's quarter, with an impressive collection of Italianate palazzo-style warehouses). The mills, chimneys and associated housing make a significant contribution to the character and identity of many of the District's settlements. Bradford's textile industry has also left a legacy of public parks, gardens and cemeteries.
- The **prehistoric rock art** of Bradford's upland areas, particularly to the north of Bradford, is of national importance.
- Literary associations of **Haworth** with the Brontë sisters (an important driver for tourism in the District).
- The Registered Battlefield at **Adwalton** (one of only seven in Yorkshire) played a pivotal role in the Civil War.

2.2 Bradford has the fourth-highest number of designated heritage assets of any authority in Yorkshire. Although these are undeniably of vital importance, they represent only a fraction of the heritage resource of the District. Indeed, it is the wealth of non-designated elements which help to give Bradford's towns, villages and countryside their distinct identity. These non-designated heritage assets are a vital part of the social and cultural identity of Bradford helping to provide distinctiveness, meaning and quality to the places in which its communities live, providing a sense of continuity and a source of identity and are valued by local people as part of the familiar and cherished local scene.

- 2.3 In line with the advice in the NPPF, it is essential that the Local Plan, as a whole, sets out a positive strategy for the conservation and enjoyment of this resource.

3 The Policy framework for the historic environment

- 3.1 With the exception of those elements set out in Section 7, below, the Submission Core Strategy sets out a good framework for the management of the District's rich legacy of heritage assets:-
- The Plan recognises the important contribution that the historic environment makes to the character of the area, to the quality of life of its communities, and to the economic well-being of the District [Paragraphs 2.63 to 2.65; 2.68].
 - The Vision includes an intention that the District's unique landscapes and heritage will have played a vital role in making places that encapsulate what makes Bradford special [Paragraph 3.3].
 - It includes a Strategic Objective that the heritage of Bradford should be safeguarded, enhanced, and promoted [Strategic Objective 12].
 - As well as including a specific historic environment Policy which identifies the distinctive elements which make up the plan area [Policy EN3], each of the individual sub-area Policies [Section 4] include a Criterion requiring development proposals in those areas to conserve the heritage assets of that part of the District.
 - The Plan sets out an intention that Saltaire, Ilkley and Haworth will have been strengthened as tourist destinations and that their distinctive character will have been protected and enhanced
 - It contains a good Policy for the building stone resource of the District [Policy EN10].
- 3.2 However, the requirements of the NPPF, insofar as they relate to the historic environment, go beyond simply ensuring that there is an appropriate Policy framework in place. The obligation to set out a positive strategy for the conservation and enjoyment of the historic environment also relates to the sites and areas which the Plan is proposing to put forward for development. Consequently, there is an onus on the local planning authority to demonstrate that the strategy for accommodating its assessed development needs is not incompatible with the policy guidance that is set out in the NPPF.
- 3.3 In three areas, the plan cannot demonstrate that its proposals are consistent with these requirements.

4 The proposed level of housing growth around the World Heritage Site

- 4.1 Saltaire is considered to be the finest and most complete example in England of an integrated mill and associated village. The layout and architecture of Saltaire reflect both mid-19th century philanthropic paternalism as well as the important role played by the textile industry in economic and social development. It was Inscribed as a World Heritage Site in 2001.
- 4.2 The landscape setting of Saltaire is a key element of its significance. In 2005, Bradford MDC commissioned and published the *“Saltaire World Heritage Site Environmental Capacity Study”* to help guide the management of the site. As part of this work, the Study sought to evaluate the contribution which the surrounding landscape made to the significance of the World Heritage Site. Based upon an analysis of their historic significance, their ability to demonstrate key aspects of the Site’s character, and their relationship with principal buildings on the Site, the Study identified a number of areas which it considered contributed to the setting of Saltaire. These are shown on Appendix B Figure 15 of the Study.
- 4.3 Policy AD1 proposes that 450 residential units be accommodated in Baildon. Whilst this total is 433 dwellings less than the trajectory total given in the SHLAA, 444 of the dwellings identified in the SHLAA are located in areas which the *Saltaire World Heritage Site Environmental Capacity Study* identified as being critical to the setting of Saltaire.
- 4.4 Assuming that the sites which could harm the significance of the World Heritage Site are not allocated, this means that even were every other housing site identified in the SHLAA to be allocated, there would still be insufficient identified sites to meet the housing figure for Baildon which is set out in Policy AD1. The only way in which the figure could be met would be if housing were developed on some of the areas which are considered to be critical to the setting of the Saltaire. English Heritage is concerned, therefore, that the figure proposed would put pressure for development on open areas of land which the Council’s own Study has identified as being critical to the setting of Saltaire.
- 4.5 Consequently, it is considered that Sub Area Policy AD1, insofar as it relates to Baildon, is unsound because it has not been demonstrated that the proposed housing figure is deliverable in a manner which would be compatible with the need to safeguard those elements which contribute to the Outstanding Universal Value of Saltaire.

5 The impact of the Holme Wood Urban Extension upon the Registered Battlefield at Adwalton Moor

- 5.1 The Battle of Adwalton Moor (30th June, 1643) played a pivotal role in the series of events that led to Parliamentary victory in the Civil War. The defeat of the Parliamentary forces at Adwalton Moor was a key factor in the involvement of the Scottish Presbyterians and the subsequent defeat of the Royalists at Marston Moor a year later.
- 5.2 The *Adwalton Moor Battlefield Heritage Impact Assessment* provides out a good evaluation of the landscape today and the elements which contribute to the significance of the Battlefield
- 5.3 Policy BDI proposes an Urban Extension to the north of the Registered Battlefield. The areas which the Council considered suitable for inclusion within this Urban Extension were identified in the “*Holme Wood & Tong Neighbourhood Development Plan (NDP) Final Report*”. These appear in the SHLAA as Sites SE/057, SE099 and SE100. The development of all of these areas could, potentially, affect the setting of the Battlefield.
- 5.4 The NPPF makes it clear that Registered Battlefields are considered by the Government to be in the category of designated heritage assets of the highest significance where substantial harm or loss should be wholly exceptional. In its response to the Publication Draft, English Heritage Objected to the proposed Urban Extension because there had been no evaluation of the degree of harm which a development of this magnitude might cause to the Registered Battlefield or what measures the Plan might need to put in place to ensure that any harm is removed or minimised. As a result, English Heritage contended that the plan could not demonstrate that the allocation of this area was compatible with need to safeguard those elements which contribute to the significance of the Registered Battlefield.
- 5.5 Since the Publication Draft, the Council has produced the *Adwalton Moor Battlefield Heritage Impact Assessment*. This document provides a good evaluation of the elements that contribute to the significance of the Battlefield. However, other than for Site SE/056 (which actually lies within the boundary of the designated area and which the Assessment advises should not be developed), the *Heritage Impact Assessment* provides no meaningful evaluation, whatsoever, of the potential impact which the loss of the currently open farmland to the north of the Battlefield and its subsequent development might have upon the significance of this important designated heritage asset.
- 5.6 The Assessment, rightly, acknowledges that SHLAA Sites SE/057 and SE/099 (Sites 2 and 3 of the Holme Wood Urban Extension) have the potential to impact upon the setting of the Battlefield. In the case of those parts of the sites

adjoining the Battlefield, it highlights the fact that there is the potential to *“impact unacceptably upon key views from the heritage asset northwards”*. However, rather than evaluating precisely what this impact might be (and therefore, whether or not the development of this area would be compatible with the appropriate protection of the significance of the Battlefield (or, equally, what mitigation measures might be necessary to ensure that its development is achieved in a manner which safeguards the setting of the Battlefield)), the Assessment simply advises that *“their development for residential purposes would require careful assessment and a clear understanding of the significance of the battlefield and its setting, with particular reference to views into and out of the battlefield”*.

- 5.7 Given that this development has the potential to harm a designated heritage asset of the highest significance, it is not appropriate for a Local Plan to allocate such a site without first demonstrating that it is capable of being developed in a manner which would be compatible with the requirements to protect that asset as set out in national policy guidance. This has not been done.
- 5.8 As a result, the Council has not demonstrated that the principle of the Holme Wood Urban Extension is compatible with either national policy guidance or the plan’s own Policies for the protection of the historic environment.

6 The proposed level of housing growth around Haworth

- 6.1 The Local Plan recognises the important role which tourism makes to the economy of the District. Due to the international popularity of the Brontes, the village of Howarth is one of Bradford’s most important tourist attractions.
- 6.2 Policy PNI proposes that some 500 houses be accommodated within the Haworth area. Whilst this figure is 195 dwellings less than the trajectory total given in the SHLAA, nonetheless, one of the largest sites identified in the SHLAA as being potentially suitable for housing (which could accommodate 112 dwellings) appears poorly-related to the form and setting of the village (a key element of its character) and another of the sites (capable of providing some 38 dwellings) lies within an area identified in the *“Haworth Conservation Area Assessment”* as being a Key Open Space.
- 6.3 Assuming that the sites which could harm the setting of the village and the character of its Conservation Area are not allocated, this means that even if every other housing site identified in the SHLAA were to be allocated, there would only be a margin of flexibility of 45 dwellings between the total amount of housing which could potentially come forward in the SHLAA and the total for Haworth which is set out in Policy PNI.

- 6.4 In addition, two sites identified in the SHLAA lie within the Haworth Conservation Area. One of these includes a Grade II Listed Building, the other a group of trees which the Conservation Area Appraisal has identified as being important. This may present a further constraint upon the potential amounts of housing available from the Haworth area.
- 6.5 The margin of flexibility between the total amount of housing identified in the SHLAA and the figure given for Haworth in Policy PNI does not appear to be sufficient to have confidence that the level of housing proposed can be delivered in a manner which is consistent with the Plan's Policies for the conservation of the historic environment..
- 4.5 Consequently, it is considered that Sub Area Policy PNI, insofar as it relates to Haworth, is unsound because it has not been demonstrated that the proposed housing figure is deliverable in a manner which would be compatible with the need to safeguard the landscape setting and character of Haworth.

7 Other matters

7.1 Non-designated archaeology

- 7.1.1 With the eventual replacement of the "saved" policies for archaeology from the Bradford RUDP by Policy EN3, the Plan will fail to provide sufficient clarity about the approach that will be taken in the case of development proposals affecting Scheduled Monuments and non-designated archaeological remains.
- 7.1.2 Policy EN3, Criterion F lumps non-designated archaeology in with other non-designated heritage assets such as buildings and historic landscapes. However, there is a marked defence in the approach and considerations which need to be taken into account when dealing with archaeology, not least of which is that some non-designated archaeological remains may be of national importance.
- 7.1.3 Consequently, insofar as archaeology is concerned, the submitted plan does not:-
- provide any certainty about how applications on planning proposals affecting archaeological sites will be determined [NPPF Paragraph 17],
 - provide a clear policy on what will or will not be permitted in development proposals affecting such remains [NPPF Paragraph 154], or
 - provide a clear indication of how a decision-maker should react to a proposal which is likely to impact upon such remains [NPPF Paragraph 154].
- 7.1.4 In order to provide an effective framework for considering planning applications affecting the archaeological resource of the District, Policy EN3 needs to be amended to address the following areas:-
- the need for developments to be located or designed to avoid non-designated archaeological remains in order to ensure that these remain preserved in situ and,

- where in situ preservation is not justified, the requirement for the developer to make appropriate and satisfactory provision for the excavation and recording of the remains before planning permission is granted, and
- the publication of findings shortly thereafter.

7.1.6 We have set out in our response the changes which we consider are necessary to Policy EN3 to address this shortcoming

7.2 Adwalton Moor Registered Battlefield

7.2.1 Registered Battlefields are included within the group of designated heritage assets which the Government considers to be of the highest significance where loss or substantial harm should be wholly exceptional. However, despite Adwalton being only one of seven Registered Battlefields in Yorkshire, there is no reference to it within the Plan. This is a significant omission, particularly in view of the likelihood of large-scale development in its vicinity.

6 **Conclusions**

6.1 Bradford has a rich legacy of historic buildings and areas. In order to ensure that the best of this resource is conserved for future generations, the LDF, as a whole, needs to set out a robust strategy for its future management in line with the advice set out in the NPPF. Whilst the Policy framework for the historic environment generally reflects national policy guidance, the proposals for Baildon, Holme Wood and Haworth appear to be incompatible with not only the Plan's own Policies but also the requirements of the NPPF. Without the necessary evidence to support the scale of growth in Baildon and Haworth or the extent of the Urban Extension at Holme Wood, the Council cannot demonstrate that, as a whole, the plan is setting out a positive strategy for the conservation of the historic environment as is required by the NPPF.