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Your ref

Dear Mr Blackburn

Bradford Local Plan Core Strategy - Examination in Public

We write following your letter dated 19th January 2015, confirming the starting date and associated arrangements for the examination of the Bradford Local Plan Core Strategy. We act on behalf of CEG Land Promotions Ltd (CEG), who submitted representations to the Publication Draft of the Bradford Core Strategy. In respect of matters relating to the associated Habitats Regulation Assessment (specifically Policy SC8) and the overall housing requirement (Policy HO1) CEG's representations were made jointly with a consortium of national house builders.

We wish to make the following points in the context of the prescribed timeframes for the examination of the Core Strategy. Despite being informed that the Core Strategy had been submitted to the Secretary of State on 12th December, we were advised, when we contacted the Council that the package of submission documents would not be immediately made available to us, due to a range of factors including the ability to upload the documents to the internet and key members of staff being on leave over the Christmas period. Whilst many of the submission documents were made available to us for the first time on Tuesday 6th January, it was clear that this did not include all relevant documentation. Following a further period of telephone calls and emails with the Council, the updated Habitats Regulations Assessment (HRA) – fundamental to our client's objections - was only made available to us on Monday 12th January (over 4 weeks after submission of the plan). The Housing Requirement Study – September 2014 update was also only made available to us on Monday 19th January (over 5 weeks after the submission of the plan).

Both these substantial and fundamental documents, which have not been subject to any form of public consultation whatsoever, nor indeed been made publicly available until now, require detailed scrutiny. From our initial review in the time available, the updated HRA in particular, inherently a technical document, appears to raise complex matters and put forward a revision of approach and methodology to that previously advanced. This appears to be not only in response to comments made by CEG and the wider house builder consortium, but also with the aim of addressing concerns expressed by Natural England regarding the overall soundness of the approach adopted.



In light of all of the delays which our client has experienced in receiving and being able to review the updated HRA as a new piece of technical work to retrospectively support the (unaltered) policy approach taken in the Publication Draft plan, then we reserve the right, upon having fully reviewed the document, to provide the Council with substantive comments on it, separate to, albeit referenced within the forthcoming hearing statements. We consider this is essential due to the technical nature of the HRA and its deficiencies relevant to the legality and soundness of the Core Strategy.

We trust that you will make this letter available to the Inspector.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Darley'.

Chris Darley
Planning Director

Cc Andrew Marshall – Bradford MDC