Mr Stephen J Pratt
Inspector
c/o Mr Tony Blackburn
Programme Officer
By Email

16th March 2015

Cc: All signatories of this letter

Dear Mr Pratt,

A joint letter from community representatives regarding proposed modifications to the settlement hierarchy

None of the community representatives in the Bradford Core Strategy foresaw what we consider to be the hostile takeover, by one or more of the developer representatives, of the proposed settlement hierarchy and its ramifications for the housing distribution in the District. In light of this, we kindly request that you accept this letter as a further, joint representation, by way of our response to the proposed main modification tabled at the Examination last week.

It is important to state at the outset that, in preparing our individual representations, we had taken the Habitats Regulations Assessment in good faith and did not anticipate that it would be so undermined in the opening session of the Examination. We are also disappointed that the neither the Council nor Natural England anticipated the problem and, as a result, had little choice at the time but to take the action they did. We have neither the time nor the expertise to scrutinise or challenge the HRA or its specific implications for the draft CS. We also fully acknowledge the developers' rights to challenge aspects of the draft CS that impact on their commercial interests. However, you will appreciate that it is impossible for community representatives and members of the public participating in the Examination to deploy the kind of resources to influence the CS that the developers have at their disposal. In any case, the impact of the CS on any party's commercial interests is immaterial and the soundness of the CS itself that is the only concern of the Examination. It is one thing for you to recommend main modifications once you have heard all the evidence, but it is quite another for such a drastic modification to be proposed mid-session on the basis of an agreement between the Council and two representatives.

We do not seek to question or debate the merits of the HRA. Our contention is twofold:

Firstly, that the Council's over-reliance on a single piece of evidence, the HRA, to justify the downgrading of Menston and Burley in the settlement hierarchy left it unduly vulnerable to challenge and that the resulting adjustments are too many, too complex and too interlinked to be presented 'on the fly' during the Examination hearings. It is essential to consider the possible impact of these proposed modifications on every single policy in the draft CS; in particular this raises the prospect that policies we did not previously object to, at Submission Draft stage and in our further statements to the Examination - might now attract objection from us and other parties.

Secondly, that the challenge we have witnessed to the HRA leads us to question the soundness of the draft CS's policies for biodiversity and green infrastructure. As with the HRA itself we had taken policies EN1 to EN8 in good faith – and we believe the Sustainability Appraisal also does so - but the fact that the application of external, impartial evidence to those policies might be challenged puts those policies at risk. We therefore consider that all stakeholders should be given a further opportunity to consider policies EN1 to EN8. Several elements of the Leeds City Region Green Infrastructure Strategy depend on Core Strategies for implementation, and we all need time to consider whether the proposed changes to the settlement hierarchy and housing distribution could compromise this important piece of inter-authority environmental strategy, which is crucial to sustainable development.

We would therefore ask you to:

- consider disallowing the proposed modifications tabled last week on the grounds that they compromise the integrity of representations made by all other parties on the soundness of the draft CS;
- provide a full opportunity for all parties to draw your attention to the potential impacts of the proposed modifications on all other policies, including those to which they have not previously objected, before your Examination closes.

Yours sincerely,

Helen Kidman, for Ilkley Civic Society

Tony Emmott, for Ilkley Design Statement Group

Neil Varley, for Ben Rhydding Green Belt Protection Group

Alan Taylor, for Addingham Civic Society

Steve Ellams, for Menston Community Association

Jackie Thompson, for Wharfedale Action for Sound Plans

Andrew Wood, for Yorkshire Greenspace Alliance