



Bradford Local Plan

Core Strategy Examination

Matter 1: Legal Compliance

Further Statement in response to joint letter submitted by Yorkshire Greenspace Alliance with other parties to the proposed modifications in relation to housing distribution .

Date: 4th March 2015

Venue: Victoria Hall, Saltaire

- 1.1 During the sessions on Day 1 of the Examination in Public into Bradford's Publication Draft Core Strategy regarding the South Pennine Moors SPA and related Habitats Regulation Assessment (HRA) there was discussion around the concerns over the evidence within the HRA and its use in supporting the approach set out in the Publication Draft (PD) Core Strategy, as submitted. The Inspector requested that the Council with its consultants work with Natural England and CEG and its consultants to agree a statement of common ground.
- 1.2 To this end a statement of common ground (PS/F014) was agreed and submitted to the examination between the above parties. This committed the Council to undertake a review of the HRA in light of the agreed principles set out in the statement of common ground. It also recognised that the scale of development in the earlier Further Engagement Draft (FED) was highly unlikely to have an impact on the SPA.
- 1.3 The Council, in light of the Statement of Common Ground and at the request of the Inspector, reviewed the settlements impacted by the HRA between FED and PD. It also reviewed other new evidence in terms of the most up to date land supply position in the emerging third SHLAA. The Council also considered the ongoing concerns of English Heritage in several settlements regarding the potential impact of scales of development on heritage assets in Haworth and also the Saltaire World Heritage Site.
- 1.4 In order to address the soundness concerns the Council proposed a modification (PS/F019) to the housing distribution to a limited number of settlements and the reinstatement of Burley in Wharfedale and Menston as Local Growth Centres in the settlement hierarchy. The proposed modification sets out the reasons and justification for the suggested changes.
- 1.5 It is appropriate and normal practice for Local Planning Authorities to consider and propose main modifications in order to ensure a local plan can be made sound if an Inspector finds soundness Concerns. In line with the provisions under Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended) the Council requested the Inspector to consider main modifications if they were considered required in order to move towards a sound plan which could be adopted.
- 1.6 In line with normal good practice any main modifications proposed in response to soundness issues raised at the examination would be published together with other minor modifications for formal comment. These comments would then be considered and reported to the Inspector for his consideration. These would normally be dealt with by written representations but may require further hearings in order for objectors to present their concerns. As note above the HRA would be reviewed (see timetable set out in PS/F042d) and then any modifications would be reappraised in both the HRA and the

Sustainability Appraisal (SA). The updated HRA and SA would be issued in support of the modifications and open to further comment. In this respect all parties will have an opportunity to formally consider the modifications and make comments.

- 1.7 It is unclear in what respect the proposed modification would have implications to policy EN1- EN8 as raised by Yorkshire Greenspace Alliance. The Council consider the scale of redistribution is limited to a small number of settlements and retains the urban focus. The EN policies provide thematic policy guidance in line with NPPF and local evidence.
- 1.8 Reference is made to the redistribution and changes to the settlement hierarchy and potential impacts on delivery of LCR Green Infrastructure Strategy. The Council do not consider that the scales of redistribution would impact on the delivery of the GI Strategy and no evidence is provided to support this proposition.
- 1.9 Reference is made to the biodiversity policy implications. It is noted that the Council is proposing modifications to Policy SC8 and EN2 which will similarly be published for comment in due course.
- 1.10 In conclusion the Council consider it right and proper that it respond to concerns over soundness of plan arise and where there is justification propose modifications. Interested parties will have a formal opportunity to comment on these modifications.