

MATTER 7D: ENVIRONMENT

Policy EN3

Supplement to Evidence submitted on 19 February, 2015

1 Proposed changes to the housing figure for Baildon

- 1.1 At last week's hearing, the Council tabled a number of changes to the proposed housing distribution for the plan area. This included a reduction in the in the housing figure for Baildon area.
- 1.2 The suggested change now provides a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire.
- 1.3 Should this change be incorporated into the Plan, it is considered that the housing requirements for the Baildon area are now likely to compatible with both national policy guidance and the plan's own Policies for the protection of the historic environment. As a result, English Heritage would withdraw its Objection to this particular aspect of the Plan.

2 Proposed changes to the housing figure for Haworth

- 2.1 At last week's hearing, the Council tabled a number of changes to the proposed housing distribution for the plan area. This included a reduction in the in the housing figure for the Haworth area.
- 2.2 The suggested change now provides a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which are important to the character and landscape setting of the settlement.
- 2.3 Should this change be incorporated into the Plan, it is considered that the housing requirements for the Haworth area are now likely to compatible with both national policy guidance and the plan's own Policies for the protection of the historic environment. As a result, English Heritage would withdraw its Objection to this particular aspect of the Plan.

3 Further assessment work of the Holme Wood proposal

- 3.1 Since the submission of our Evidence to the Examination, the Council has been in discussions with English Heritage about the work that is considered necessary to demonstrate that the allocation of this area is not incompatible with the protection of the Registered Battlefield.
- 3.2 As a result of these discussions, the Council has commissioned Consultants to undertake an assessment to evaluate the likely impact which the development at Holme Wood might have upon the Registered Battlefield. This piece of work will involve the following:-
- The production of a zone of theoretical visibility for all viewpoints where development of SHLAA sites could impact upon the views from the Battlefield that are identified in the Heritage Impact Assessment.
 - An analysis of the context/quality of the views.
 - An evaluation of the likely impact of the development upon views
 - The identification of ways in which any harm might be mitigated.
 - A final visual assessment of the final locations proposed for development, the scale of the buildings proposed in those areas (i.e. 2 or 3-story) with the suggested mitigation measures in place at a number of stages in the lifetime of the proposed development (1 year, 10 years, 15 years).
- 3.3 English Heritage is satisfied that, as a result of this work, one should be able to identify the locations within the Holme Wood Urban Extension where development could take place and the heights of buildings that could be constructed without harming those elements which contribute to the significance of the Battlefield. It would also enable a more accurate evaluation to be made of the amount of development that might come forward from this area.
- 3.4 Unfortunately, the results of this exercise are not yet known so English Heritage is not in a position, at this stage, to formally change its view about the soundness of this particular proposal within the Plan. Moreover, even if this work had been available at this juncture, its recommendations are not securely and effectively tied into the Local Plan so there is no guarantee that the proposed mitigation measures would actually be implemented. Consequently, in addition to the satisfactory completion of the additional evaluation, the following changes are also necessary to the Core Strategy:-
- (a) A commitment within the Core Strategy Policy that an Allocations DPD (or equivalent document) will be produced by the Council which will set out a clear framework the future development of the Holme Wood area, and
 - (b) A commitment within the Core Strategy Policy that such a document would be guided by and incorporate the mitigation measures

recommended in the work that is currently underway as part of the Heritage Impact Assessment in order to protect the setting of the Registered Battlefield at Adwalton

- 3.5 Should the additional work to the Heritage Impact Assessment prove satisfactory and the two measures set out above be incorporated into the Local Plan, English Heritage would have no objections to the principle of the allocation of the Holme Wood area for residential development.