

FREETHS

CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL CORE STRATEGY EXAMINATION

COMMENTS FROM CEG LAND PROMOTIONS LTD ON HOMEWORK ITEM 12: DOCUMENT PS/F042d

1. Homework item 12 requires the Council to “clarify timescale of HRA review”, following the Inspector’s request at the morning session of the Examination on 10 March 2015.
2. In response to homework item 12, the Council submitted document PS/F042d entitled “Further Statement on the programme for Review of the Habitats Regulations Assessment”. Document PS/F042d states that the “Phase 1 initial HRA review” is to be conducted in “March – early May”, followed by “Publication of reviewed HRA” in “June / July”.
3. This Phase 1 initial HRA review requires consultation with and the input of both Natural England (“NE”) and CEG Land Promotions Ltd (“CEG”). Paragraph 7 of the “Note of Principles Agreed as between the Council, Natural England and CEG Land Promotions Ltd (“CEG”) to address the Council’s Habitats Regulations Assessment” (PS/F014), as finalised and signed by all three parties on 9 March 2015, states that “the HRA Dec 2014 will require review and revision with input from and consultation with all parties to this Note” (see this Note at Annex A).
4. CEG has therefore been keen to agree with the Council a HRA consultation timetable to ensure that the Phase 1 initial HRA review and associated consultation is indeed achieved by “early May” and so that the remaining HRA publication timetable set out in PS/F042d can also be achieved.
5. To this end Freeths wrote an email to the Council on 1 April 2015 seeking the Council’s agreement to CEG’s suggested consultation timetable; and by letter on 9 April 2015 Freeths reiterated its request for the Council’s substantive response to its suggested timetable (see Annex B). On 13 April 2015 the Council informed Freeths by email that “we are still finalising the detailed programme and will be in touch ASAP”. We have heard nothing further from the Council on this matter since then.
6. We also note that the Inspector has emailed the Council (2 April 2015), requesting the Council to confirm the nature and extent of any formal or informal consultation with Natural England and any other parties before finalising the amended HRA (document PS/A009a). We have not seen any response from the Council to this request.
7. CEG is concerned at the absence, to date, of any detailed consultation programme for the HRA review. The Phase 1 initial HRA review is due to be completed by “early May”, which is now only 10 days or so away. CEG is keen to be able to contribute its team’s expertise to the HRA review process so as to allow delivery of a robust and legally compliant HRA. We would therefore respectfully request the Inspector to encourage the Council to circulate a HRA review consultation timetable without further delay.
8. We note the Inspector’s suggestion, in document PS/A009a, that “If the amended HRA is subject to full public consultation, it may be possible to hold a short hearing session of the examination to consider any specific issues raised by the representations relating to the soundness of the plan before the Main Modifications are published”. On the basis that the revised HRA is consistent with the detailed discussions that have already taken place as between CEG, NE and the Council to date, we anticipate that there could be a short period of

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public consultation and a hearing, but we reserve our position on this until nearer the time, when we will have better understanding of how the HRA review has progressed.

21 April 2015

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Annex A

Bradford Metropolitan District Council Local Plan Core Strategy Examination

NOTE OF PRINCIPLES AGREED AS BETWEEN THE COUNCIL, NATURAL ENGLAND AND CEG LAND PROMOTIONS LTD TO ADDRESS THE COUNCIL'S HABITATS REGULATIONS ASSESSMENT

Background

1. On the morning of 4 March 2015 at the Bradford Metropolitan District Council (“**Council**”) Local Plan Core Strategy Examination there was consideration of CEG’s representations and some preliminary questions were asked by CEG and the Inspector of Natural England (“**NE**”) and the Council and its consultants. As a result of this preliminary discussion, it was established that:
 - 1.1. CEG Land Promotions Limited (“**CEG**”) had made extensive submissions regarding the Council’s Habitats Regulations Assessment dated December 2014 (“**HRA Dec 2014**”);
 - 1.2. CEG’s submissions were in part based on background information or data relating to the HRA Dec 2014 which CEG had to secure by information requests of the Council, but which had not been provided by the Council to NE and which NE had not seen. CEG had obtained this information from the Council on 30 January 2015 through an access to environmental information request;
 - 1.3. The Conservation Objectives for the South Pennine Moors Phase 2 SPA, as published on NE’s website and dated 30 June 2014, were incorrect in reference to one species.
2. In the light of these points, the Inspector considered there were serious questions about the HRA Dec 2014, at the present time, which went to the root of the Core Strategy on housing distribution and settlement status and affected the soundness of the Core Strategy. He suggested that a revised appropriate assessment may be needed.
3. The Inspector noted CEG had been requesting a statement of common ground for some time and he requested that the Council and NE meet with CEG to discuss in a collaborative way and agree a way forward for the appropriate assessment issues in advance of the Matter 3 / Policy SC8 session on Tuesday 10 March 2015.

Purpose of this document

4. In accordance with requests of CEG and the Inspectors request, two meetings have taken place between the parties to discuss these matters: on the afternoon of Wednesday 4 March 2015; and on Monday 9 March 2015.
5. This document sets out the principles as agreed between CEG, NE and the Council to take forward and seek to resolve the problems that have been identified by CEG.
6. The agreement of principles set out in this document is strictly without prejudice to the “citation issue” i.e. CEG’s submission that the correct list of qualifying species in relation to the South Pennine Moors SPA, upon which the appropriate assessment of the Core Strategy must be based, is the list provided by JNCC following its 2001 SPA review.

Agreed principles

Resolving “the problem” and current conclusions

7. The HRA Dec 2014 will require review and revision within input from and consultation with all parties to this Note ("the Review") in accordance with the agreed principles attached to this document, before the Core Strategy is adopted.
8. Having considered the survey information and data, both existing at the time of publication of the HRA Dec 2014 and provided subsequently by NE, it is agreed that there is sufficient information to conduct the Review without the need for further survey work based on the agreed common ground set out below and attached.
- 9.

Subject to the Review, having assessed all available information, on the basis of the principles attached including the need for a revised form of Policy SC8, it is agreed that the settlement status for Burley-in-Wharfedale as a Local Growth Centre and the housing targets set out in the Further Engagement Draft of the Core Strategy for Burley-in-Wharfedale (as a minimum) are highly likely to be able to be delivered without any adverse impact on the integrity of the SPA or the SAC alone or in combination with other plans or projects. This is in accordance with NE's letter dated 31 March 2014, page 3 "*Prior to any reduction in housing targets, the HRA must prove that sufficient sites, to meet the previous settlement targets, cannot be allocated without adverse effects on integrity. Without this, any reduction may be challenged and found unsound.*"

10. It is further agreed that it is likely that all of the SHLAA 2 Capacity/Trajectory sites that have been identified at Burley-in-Wharfedale could be developed in principle (with the corresponding increase in housing targets that would be possible) exceeding those set out in the Further Engagement Draft of the Core Strategy without any adverse impact on the integrity of the SPA or the SAC.
11. This is a conclusion reached, acknowledging that further analysis will need to be carried out on the existing survey data to conclude the Review.
12. These points of agreement will be assessed in a comprehensive Review of the HRA Dec 2014, to be completed in accordance with the principles attached before the Core Strategy is adopted.
13. As a result of these conclusions, the Council will put forward a Main Modification to the Submission Draft of the Core Strategy to reinstate Burley-in-Wharfedale as a Local Growth Centre and to provide as a minimum, for the housing numbers set out in the Core Strategy Further Engagement Draft (see column 5 in Table 2 in the Council's Background Paper: 1. Overview (Updated) dated December 2014).

Signed:

NE.....

CEG.....

Council.....

[Handwritten signatures]
 NE..... *[Signature]*
 CEG..... *[Signature]*
 Council..... *A Marshall*

09/03/15

ANNEX

BRADFORD METROPOLITAN DISTRICT COUNCIL
LOCAL PLAN CORE STRATEGY EXAMINATION

NOTE OF AGREED PRINCIPLES AS BETWEEN THE COUNCIL, NATURAL ENGLAND AND
CEG LAND PROMOTIONS LTD TO ADDRESS
THE COUNCIL'S HABITAT REGULATIONS ASSESSMENT

ANNEX

1. The principles agreed in this document are without prejudice to CEG's view that the correct list of qualifying features by which to assess (under regulation 102 Conservation of Habitats and Species Regulations 2010) the impacts of the Core Strategy is the list published by Joint Nature Conservation Committee (JNCC) following its 2001 review.
2. The AA Dec 2014 requires review.
3. The review can be conducted on the basis of existing data. No further data is required.
4. The review will follow the assessment structure outlined in Figure 1 of ODPM Circular 06/2005.
5. The relevant conservation objectives for the purpose of the review will be NE's conservation objectives for the South Pennine Moors Phase 2 SPA dated 4 March 2015.
6. The basis of the review will be housing reflecting the SHLAA 2 capacity (ie SHLAA 2 trajectory sites) as background to the housing targets in the Core Strategy Further Engagement Draft.
7. The NE 2014 SPA breeding bird survey data will provide the baseline against which the assessment of impacts of the Core Strategy on birds of the SPA's breeding bird assemblage qualifying feature will be undertaken. The assessment will further consider, as against that baseline, the breeding bird survey data of 2013.
8. The SPA's breeding bird assemblage qualifying feature population is to be calculated by assuming that there is a breeding pair of birds for each "territory centre" identified in the 2014 breeding bird survey. At present this is thought to be 2,300 birds.
9. When assessing impacts on SPA qualifying species birds, the assessment will consider their presence on land up to 2.5km from the SPA boundary only.
10. The parties have agreed the activity types from the 2013 breeding bird survey which are relevant to assessing impacts on the SPA breeding bird assemblage qualifying feature. In essence these are birds which are foraging outside the SPA and not birds which were recorded in the 2013 survey as breeding outside the SPA or as merely overflying. It is proposed at this stage that the assessment is made on this assumption even though it is likely that some of these birds are in fact breeding outside the SPA and CEG reserves its position on this final point.
11. It is CEG's position that there is no evidence to support any indirect effects of urbanisation of sites on neighbouring foraging birds of the breeding bird assemblage species. The Council does not agree. The parties agree that if the Council wishes to pursue this point in the review it will have to demonstrate, through relevant scientific evidence, that this impact pathway does exist.
12. The assessment of impacts on the breeding bird assemblage qualifying feature of the SPA is to be made on the basis of the total population of all species making up the breeding bird assemblage across the SPA. In this context, diversity of the assemblage is a relevant consideration.

13. On the basis of the assessment above, the assessment must identify the SHLAA 2 trajectory sites which are:
- a. Unlikely to be deliverable (where significant bird numbers are recorded and mitigation is not possible); or
 - b. Deliverable with mitigation (either site specific or strategic mitigation); or
 - c. Deliverable without mitigation (unconstrained).

Where b. or c. applies, the relevant sites will not be excluded from the resulting housing targets for individual settlements on Habitat Regulations Assessment grounds.

14. In view of the absence of a correlation as between what is described as "supporting habitat" in the AA Dec 2014 and the use of breeding bird assemblage species of those habitats, any SHLAA 2 trajectory site containing any one or more of the "supporting habitats" of rush pasture, species rich semi improved grassland or unimproved grassland shall not be precluded from the housing target figures on Habitat Regulations Assessment grounds but will be subject to further assessment at a later stage.
15. Policy SC8 as set out in the Core Strategy Publication Draft as submitted to the Examination will require revision. Policy SC8 will be revised when the AA Dec 2014 review is complete. Nevertheless the parties agree at this stage that its reformulation should track the language of the Habitats Directive tests and that Policy SC8 will also make explicitly clear that, across all zones except Zone A, avoidance and / or mitigation measures will be in principle acceptable where appropriate to address any risk of likely significant effect on the SPA or SAC or risk of adverse effect on integrity of the SPA or SAC.
16. CEG does not agree with the recreational or urban edge impacts described in the AA Dec 2014. CEG reserves its position on this point. However the parties agree that revised Policy SC8 should leave open whether an individual developer (i) makes a financial contribution as is currently envisaged in Policy SC8 or (ii) offers to deliver alternative measures. A supplementary planning document will follow and will impose tariffs and / or other and measures to be specified in proportion to impacts.

Council - A Marshall

Natural England *Kelvin*

CEG - *STMB*

09/03/15

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Annex B

Lindsey Young

From: Penny Simpson
Sent: 01 April 2015 18:09
To: Jane Scott; Andrew Marshall
Cc: Christopher Darley (cdarley@nlppanning.com); 'Andrew Baker'; 'Steve McBurney'; 'King, John J (NE)'; 'Nicholas Pincombe'; 'Jonathan Cox'
Subject: Bradford Core Strategy: Suggested HRA review timetable for agreement

Dear Andrew and Jane

You will recall that in the "Note of principles agreed as between the Council, NE and CEG" dated 9 March 2015 (para 7) it was agreed that "*the HRA Dec 2014 will require review and revision with input from and consultation with all parties to this Note*". In the Council's "Further Statement on the programme for Review of the Habitats Regulations Assessment" dated 10 March 2015, the Council stated that the Phase 1 initial HRA review would be conducted between March and early May 2015.

Time is marching on and so it is important to put in place a timetable so as to secure delivery of the revised HRA by "early May", as per the Council's commitment. We suggest a timetable below. This reflects the need for close cooperation between the Council, CEG and NE throughout the HRA review process so as to deliver an appropriate and agreed revised HRA in the required timeframe.

1. By close of business Wed 8 April 2015: Production by the Council for CEG and NE of:
 - (i) a skeleton of a revised HRA setting out the proposed chapter headings and subheadings and basic content of the proposed revised HRA, as per the Note of agreed principles; and
 - (ii) a preliminary assessment of impacts on the South Pennine Moors SPA based on the NE 2014 baseline survey data.
2. By close of business Tuesday 14 April 2015: Provision by CEG of comments on 1. above to the Council, copied to NE. NE will no doubt provide their comments on 1. to the Council, copied to CEG, as soon as they are able.
3. By close of business Friday 24 April 2015: Production by the Council to CEG and NE of a first full revised draft HRA.
4. By close of business on Friday 1 May 2015: Provision by CEG of comments to the Council on 3. above. NE will no doubt provide their comments on 3. to the Council, copied to CEG, as soon as they are able.
5. By close of business on Friday 8 May 2015: Production by the Council of second full revised draft HRA.
6. By close of business on Friday 15 May 2015: Provision of any final comments by CEG to the Council on 5. above. NE will no doubt provide their comments on 5., copied to CEG, as soon as they are able.

We would be very grateful if you could confirm by close of business on Thursday 2 April that this timetable is acceptable, so that we can be assured that there is no need to raise this matter with the Inspector next week.

Regards

Penny Simpson

FREETHS

Mr Andrew Marshall
City of Bradford Metropolitan District Council
Jacob's Well
Nelson's Street
Bradford
BD1 5RW

Direct dial: 0845 017 1133
Direct fax: 0845 077 9603
Switchboard: +44 (0)845 077 9696
Email: penny.simpson@freeths.co.uk

By Post and Email:
andrew.marshall@bradford.gov.uk

09 April 2015

Our Ref: PAS/1776/2024678/2

Dear Andrew

BRADFORD CORE STRATEGY: POLICY EN2

Introduction

I refer to the email and telephone discussions as between me and you / Jane Scott last week, in which we were seeking to agree the wording of Policy EN2.

On the morning of Thursday 2 April 2015 I responded to Jane's further request for comments on the Council's latest draft of EN2 and I tried to speak to Jane twice that morning to reach final agreement with the Council. Unfortunately she did not return my calls and emailed me to apologise and to say that she was submitting, as Homework, Policy EN2 in an unagreed form. She invited CEG to make comments to the Inspector on this over the next 2 weeks.

The Homework item (number 41) relevant to Policy EN2 states "Council to finalise wording of Policy EN2 agreed with NE and NLP / CEG". The document submitted to the Examination by the Council in response to this Homework item (PSF072) does not meet this requirement as the form of EN2 presented in the document is not agreed as between NLP/CEG and the Council.

It is unhelpful for the Inspector / the Examination not to have before it an agreed form of EN2 as per the Homework requirement. For that reason I write again now to seek agreement with the Council on Policy EN2, in advance of the deadline for comments being Tuesday 21 April 2015. This letter is written without prejudice to our right to respond to PSF072 by that deadline.

Policy EN2

Paragraphs A, B and C of Policy EN2 have been agreed. There are however a number of issues outstanding on Paragraphs D and E of Policy EN2, affecting the soundness of this Policy, which need to be agreed. These are set out below. Please bear in mind that Natural England ("NE") has confirmed by telephone to me on Wednesday 1 April 2015 that they have no issue with these

amendments which serve to clarify matters and indeed they confirmed their contentment with CEG's proposed changes to Policy EN2 in their email to the Council (enclosed) on 2 April 2015.

Paragraph D of Policy EN2: Habitats and Species outside Designated Sites

1. The Council's present draft of paragraph D of Policy EN2 (see PSF072) reads:

"Habitats and Species outside Designated Sites

- D. *Proposals that may have an adverse impact on important habitats and species outside designated sites need to be assessed according to the following criteria:-*
 1. *The potential for adverse impact on important/priority habitats that occur outside designated sites;*
 2. *The potential for adverse impact on species of international, national and local importance;*
 3. *The extent to which appropriate measures to mitigate any potentially harmful impacts can be identified and carried out.*

The assessment needs to take account of:

West Yorkshire Local Site Selection Criteria; and

Where relevant developers will be expected to submit (European) Protected Species surveys and other ecological assessment related information with their application.

Development which would cause serious fragmentation of habitats, wildlife corridors or have a significantly adverse impact on biodiversity networks or connectivity will be resisted."

2. There are two key issues here:
 - 2.1. There is no recognition of the distinction between mitigation and compensatory measures or of the role that compensatory measures play in offsetting impacts.
 - 2.1.1. This is in contravention of paragraph 118 (first bullet) NPPF which clearly recognises the relevance and role of compensatory measures "*if significant harm resulting from development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused*".
 - 2.1.2. This is in conflict with agreed Paragraph C of Policy EN2 where, following our comments, the Council has now accepted that a distinction between mitigation and compensatory measures must be made.
 - 2.1.3. This is in conflict with the legal regime protecting European Protected Species (EPS) as found in Part 3 Conservation of Habitats and Species Regulations 2010. Under this regime compensatory measures are relevant to allow a developer to meet the "favourable conservation status" test of regulation 53(9)(b) so as to obtain a licence from NE to derogate in certain circumstances from the protection which EPS otherwise enjoy. The Council has a duty under regulation 9(3) Conservation of Habitats and Species

Regulations 2010 to, in the exercise of its functions, have regard to the Habitats Directive (from where the "favourable conservation test" derives). Therefore in adopting Policy EN2 the Council is required to reflect these requirements including the relevance of compensatory measures.

2.2. There is no recognition of the principle that development interests may in certain circumstances need to override nature conservation interests.

2.2.1. This is in conflict with agreed Paragraphs A, B and C of Policy EN2. All these paragraphs reflect the need in certain circumstances for development interests to override nature conservation interests. Paragraph A deals with the most protected Natura 2000 sites and recognises the derogation tests in Article 6(4) Habitats Directive which allow the conservation interests of Natura 2000 sites to be overridden in limited circumstances. Paragraph B deals with SSSIs and Paragraph C deals with Locally Designated Sites and both recognise the need in certain circumstances for development interests to override conservation interests. However Paragraph D, which deals with areas *outside* designated sites (which are therefore in general of less value from a nature conservation point of view), perversely does not recognise this.

2.2.2. Given our comments in the paragraph above, we conclude that Paragraph D is at odds with paragraph 113 NPPF which requires criteria based policies reflecting the hierarchy of sites.

3. Amendments to Paragraph D should therefore be made as follows:

"Habitats and Species outside Designated Sites

D. *Proposals that may have an adverse impact on important habitats and species outside designated sites need to be assessed according to the following criteria:-*

1. *The potential for adverse impact on important/priority habitats that occur outside designated sites;*
2. *The potential for adverse impact on species of international, national and local importance;*
3. *The extent to which appropriate measures to mitigate any potentially harmful impacts can be identified and carried out.*
4. *The extent to which appropriate measures to compensate as a last resort any potentially harmful impacts can be identified and carried out.*

The assessment needs to take account of:

West Yorkshire Local Site Selection Criteria; and

Where relevant developers will be expected to submit (European) Protected Species surveys and other ecological assessment related information with their application.

Development which would cause serious fragmentation of habitats, wildlife corridors or have a significantly adverse impact on biodiversity networks or connectivity will be resisted unless it can be clearly demonstrated

that there are reasons for the proposal which outweigh the need to safeguard the substantive nature conservation value of the features of interest."

Paragraph E Enhancement – final paragraph

4. The Council's present draft of the final paragraph of section E of Policy EN2 (see PSF072) reads:

"Where supported by evidence the Council will recognise the importance of foraging /commuting areas for protected and SPA/SSSI species and qualifying features outside the statutory designated area as a material consideration in the preparation of development plans and in the determination of planning applications. Where supported by evidence, foraging sites, currently outside the SPA/SAC and SSSI will be considered for designation as a Locally Designated Site."

5. There are three key issues here:

- 5.1. The Council, NE and CEG have already agreed the correct approach to assessing the impacts of projects on the South Pennine Moors SPA and this is clearly set out in the agreed Policy SC8 (see PSFO66). This states that, for developments within 2.5km of the South Pennine Moor SPA boundary "it will be considered, based on such evidence as may be reasonably required, whether land proposed for development affects foraging habitat for qualifying species of the SPA." The wording of the final paragraph of Policy EN2 is not consistent with this agreed approach – it makes no reference to the 2.5km zone and it refers to foraging and commuting areas. This creates confusion. It is essential that the final paragraph of EN2 is consistent with what has already been agreed as between NE, CEG and the Council in relation to assessing impacts on the South Pennine Moors SPA. NE has already confirmed that they are content with our amendment to this final paragraph (see below) which addresses this point.
- 5.2. The words "the importance of" must be deleted. It is incorrect as a matter of law to refer to "the importance of foraging / commuting areas" as a "material consideration". It is the existence of a foraging / commuting area which is a material consideration. The importance of a foraging or commuting area is relevant instead to the weight to be afforded to that material consideration in the determination of the planning application.
- 5.3. It is wrong and duplicitous to refer to "SPA / SSSI species and qualifying features". The correct phrase is simply "SPA/SSSI qualifying features."
6. Amendments should therefore be made as follows:

"In accordance where relevant with Policy SC8 and where supported by evidence the Council will recognise the importance of foraging / commuting areas for protected and SPA/SSSI species and qualifying features outside the statutory designated area as a material consideration in the preparation of development plans and in the determination of planning applications. Where supported by evidence, foraging sites, currently outside the SPA/SAC and SSSI will be considered for designation as a Locally Designated Site."

Timetable for review of Council's Appropriate Assessment

I note your email dated 2 April 2015 (copy enclosed) responding to CEG's suggested timetable for the Council's production and consultation with CEG on the revised Appropriate Assessment. I look forward to your substantive response expected this week.

Yours sincerely



Penny Simpson
Partner

Encs

1. Natural England (John King) email dated 2 April 2015
2. Council (Andrew Marshall) email dated 2 April 2015

cc By email Jane Scott, jane.scott@bradford.gov.uk

Lindsey Young

From: King, John J (NE) [John.King2@naturalengland.org.uk]
Sent: 02 April 2015 10:24
To: Jane Scott
Cc: Penny Simpson; Buddle, Zoe (NE); Keatley, Tom (NE)
Subject: CEG Amendments to Policy EN2

Dear Jane,

Having reviewed the amendments to policy EN2 by CEG (email dated 31/3/2015), Natural England advise Bradford MDC, as the plan making body, that they do not significantly alter the policy's environmental intentions or its soundness.

Regards

John King

John King
Lead Adviser

Sustainable Development and Marine

Yorkshire and Northern Lincolnshire
Natural England
8 City Walk

Leeds

LS11 9AT

Mobile: 07795121374

Tel: 0300 060 4129

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

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Penny Simpson

From: Andrew Marshall [andrew.marshall@bradford.gov.uk]
Sent: 02 April 2015 13:58
To: Penny Simpson
Cc: Jane Scott; 'Chris Darley'; 'King, John J (NE)'; 'Nicholas Pincombe'; 'Jonathan Cox'; Danny Jackson
Subject: RE: Bradford Core Strategy: Suggested HRA review timetable for agreement

Penny

Thank you for your email with your suggested programme for the HRA review. We are still in the process of firming up the detailed programme with our consultants (who are also liaising with NE on the scope) and will be in touch with our programme in due course which will indicate key work streams and when we anticipate engaging informally with CEG representatives at key stages/milestones of that work. I would hope we will be able to share it with you later next week - though this may be impacted by Easter holiday commitments.

As noted in other emails we have now closed out the further statements linked to the Inspectors home work and I anticipate the Programme officer inviting participants for further comments next week giving them 2 weeks from that date for any responses, followed by a further week for Council responses if required.

Regards

Andrew Marshall
Planning & Transport Strategy Manager

**City of Bradford Metropolitan District Council
Department of Regeneration and Culture**

Floor 2 (South) Jacobs Well Bradford BD1 5RW

T 01274 434050
F 01274 433767
E andrew.marshall@bradford.gov.uk
W www.bradford.gov.uk

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From: Penny Simpson [mailto:Penny.Simpson@freeths.co.uk]
Sent: 01 April 2015 18:09
To: Jane Scott; Andrew Marshall
Cc: Christopher Darley (cdarley@nlplanning.com); 'Andrew Baker'; 'Steve McBurney'; 'King, John J (NE)'; 'Nicholas Pincombe'; 'Jonathan Cox'
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2. By close of business Tuesday 14 April 2015: Provision by CEG of comments on 1. above to the Council, copied to NE. NE will no doubt provide their comments on 1. to the Council, copied to CEG, as soon as they are able.

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5. By close of business on Friday 8 May 2015: Production by the Council of second full revised draft HRA.

6. By close of business on Friday 15 May 2015: Provision of any final comments by CEG to the Council on 5. above. NE will no doubt provide their comments on 5., copied to CEG, as soon as they are able.

We would be very grateful if you could confirm by close of business on Thursday 2 April that this timetable is acceptable, so that we can be assured that there is no need to raise this matter with the Inspector next week.

Regards

Penny Simpson

Penny Simpson
Partner
Planning and Environment

E: Penny.Simpson@freeths.co.uk
T: 0845 017 1133
F: 0845 077 9603
M: 07918767811

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Freeths LLP, 2nd Floor, Leopold Wing, Fountain Precinct, Balm Green, Sheffield S1 2JA

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