

**CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL
BRADFORD LOCAL PLAN CORE STRATEGY - EXAMINATION**

INSPECTOR'S INITIAL COMMENTS ON COUNCIL'S PROPOSED MODIFICATIONS

1. The Inspector has considered the schedules of Proposed Main Modifications to the Bradford Local Plan Core Strategy and has the following comments:

a. Section 3: Vision, Objectives and Core Policies

- Mods 1, 6, 8 & 10: These modifications seem to reflect the revised settlement hierarchy following discussions and further work on the HRA and revised housing targets for Burley and Menston, and reflect the sustainable nature and roles of these and other settlements;
- Mod 2: This modification seems to reflect the amendments suggested in PS/F032 and clarify local housing needs;
- Mod 3: This modification seems to clarify the definition of "Hubs", as suggested at the hearing session and set out in PS/F058;
- Mods 4-5: These modifications seem to clarify the application of Policy SC3, as suggested at the hearing session;
- Mod 6: This modification seems to reflect the revised settlement hierarchy and status of Local Growth Centres, following discussions at the hearings;
- Mod 7: This modification reflects the suggested changes to the status of Burley and Menston and clarify the relationship with local housing needs;
- Mod 9: This modification seems to reflect the changes suggested in PS/F032 relating to local housing needs;
- Mod 11: This modification seems to reflect the revised settlement hierarchy and the changes suggested in PS/F032 regarding local housing need assessments and calculations;
- Mod 12: This modification seems to clarify the role of the policy in relation to Site Allocations DPDs, without preventing sustainable windfall developments from coming forward;
- Mod 13: These modifications seem to clarify the application of Accessibility Standards and reflect the approach of Policies TR1 & TR3;
- Mods 14-15: These modifications seem to clarify the nature of the exceptional circumstances required for Green Belt releases through a selective Green Belt review, reflecting NPPF (¶ 82); further wording summarising the exceptional circumstances is needed in the accompanying text, as set out in PS/F067;
- Mod 16: This modification amends Policy SC8 following the discussions at the hearing sessions and the review of the HRA, as agreed with Natural England and set out in PS/F072; further changes may be needed as a result of the outcome of the HRA review.

b. Section 4: Sub-Area Policies

- Mods 1-5: These modifications seem to reflect the amendments to the housing distribution proposed under Policy HO3 and clarify the amounts of housing development apportioned to each part of the sub-area in Policy BD1; they also clarify the application of the policy and its criteria to particular parts of the sub-area, following discussions at the hearing sessions and with key stakeholders and responsible bodies;
- Mods 6-9: These modifications seem to reflect the amendments to the housing distribution proposed under Policy HO3 and clarify the amounts of housing development apportioned to each part of the sub-area in Policy AD1; they also clarify the application of the policy and its criteria to particular parts of the sub-area, following discussions at the hearing sessions and with key stakeholders and responsible bodies, and the suggestions in PS/F032 related to local housing needs;
- Mods 10-12: These modifications seem to reflect the amendments to the housing distribution proposed under Policy HO3 and clarify the amounts of housing development for each part of the sub-area in Policy WD1, including the revised housing targets in Burley and Menston; they also clarify the application of the policy and its criteria to particular parts of the sub-area,

following discussions at the hearing sessions and with key stakeholders and responsible bodies, and the suggestions in PS/F032 relating to local housing needs and the scale and extent of Green Belt changes;

- Mods 13-17: These modifications seem to reflect the amendments to the housing distribution proposed under Policy HO3 and clarify the amounts of housing development apportioned to each part of the sub-area in Policy PN1; they also clarify the application of the policy and its criteria to particular parts of the sub-area, following discussions at the hearing sessions and with key stakeholders and responsible bodies, and the suggestions in PS/F032 relating to local housing needs;

c. Section 5.1: Economy & Jobs

- Mod 1: This modification seems to clarify the meaning and application of "Economic Growth Area" in Policies EC1 & SC1, as discussed at the hearing sessions and set out in PS/F057;
- Mods 2-4: These modifications seem to provide a clearer indication of projected jobs growth (1600), rather than the previous aspirational figure, as set out in PS/F065;
- Mod 5: This modification seems to clarify the nature and amount of potential new employment land under Policy EC2;
- Mod 6: This modification seems to clarify the distribution of employment land within the district and reflects the need to plan positively for growth;
- Mod 7: This modification seems to clarify the meaning and application of "Strategic Employment Zones" relating to Policy EC4, as set out in PS/F055;

d. Section 5.3: Housing

- Mods 1- 2: These modifications seem to reflect the further work undertaken as part of the Housing Requirement Study and work at Leeds City Region level, including the latest household projections, and clarify the assessment of market drivers and indicators which informed the Council's objective assessment of housing need, as set out in PS/F059; it also confirms that housing needs are to be met in full;
- Mods 3-4: These modifications seem to reflect the amended designation of Burley and Menston as Local Growth Centres, following the revised HRA;
- Mods 5-15: These modifications seem to reflect the revised settlement hierarchy and distribution of housing development across the district and within each sub-area set out in revised Policy HO3, following the revised HRA and discussions at the hearing sessions and with responsible bodies, and to ensure consistency;
- Mod 16: This modification seems to clarify the phasing policy of the plan, ensure the delivery of the required amounts of new housing, and reflect the discussions at the hearing sessions; **the accompanying text should make it clear that this policy only applies to the allocation of sites in the subsequent Site Allocations DPDs and is not intended to prevent other future sustainable housing developments from coming forward;**
- Mod 17: This modification seems to reflect the revised timescales for the adoption of the plan and explain and clarify the application of some of the criteria, as discussed at the hearing sessions;
- Mods 18-19: These modifications seem to reflect and clarify the intention of Policy HO5 and its application in terms of density;
- Mods 20-22: These modifications seem to clarify the policy, to more clearly and consistently express the targets for new housing development on brownfield land;
- Mod 23: This modification seems to confirm that viability will be a consideration when determining an appropriate housing mix under Policy HO8, as set out in PS/F068;
- Mods 24-31: These modifications seem to amend Policy HO9 and the accompanying text to ensure that it is consistent with the latest national policy on housing standards, confirm the support to renewable and low carbon energy generation, and clarify the approach to accessible homes, with associated amendments to the monitoring framework, as set out in PS/F069 & PS/F0860o;

- Mods 33-34: These modifications seem to reflect the latest national policy on minimum affordable housing thresholds, as discussed at the hearing sessions and in the representations, as set out in PS/F073;
- e. **Section 5.4: Environment**
- Mods 1-6: These modifications seem to clarify the overall approach to biodiversity and geological conservation in Policy EN2, as discussed at the hearing sessions and with Natural England and other representors and set out in PS/F072 & PS/F086p; further changes may be needed as a result of the outcome of the HRA review;
 - Mods 7-8: These modifications seem to clarify the approach to flood risk, including taking account of all sources of flood risk including groundwater flooding, following discussions at the hearing sessions and in PS/F078;
 - Mod 9: This modification seems to clarify the approach to land instability, in response to the Coal Authority and set out in PS/D003b & PS/F036b;
- f. **Section 5.5: Minerals**
- Mods 1-2: These modifications seem to clarify and provide additional information about the approach to minerals, including the Local Aggregate Assessment, landbanks and apportionment, as requested by the Inspector and set out in PS/F048;
 - Mod 3: This modification clarifies the approach to coal and hydrocarbons, following discussions at the hearing sessions;
 - Mod 4: This modification deletes the criterion relating to demonstrating the quality of the coal resource to be extracted, in order to be consistent with national policy;
 - Mod 5: This modification seems to clarify the situation where sandstone safeguarding would not apply in cases of prior extraction;
- g. **Section 5.6: Waste**
- Mods 1-8: These modifications seem to clarify and provide additional information about the approach to waste management, including waste arisings, waste management capacities, cross-boundary working, and the policies on waste management and future waste management facilities and sites, and Area of Search, in order to provide sufficient strategic framework and spatial direction for the subsequent Waste Management DPD, as requested by the Inspector and set out in PS/F049;
- h. **Section 7: Monitoring**
- Mod 1: This modification seems to amend the indicator relating to jobs growth to reflect changes to Policy EC2;
- i. **Appendices**
- Mods 1, 7 & 8: These modifications seem to amend and clarify the Parking Standards to define the minimal operational parking standard and bring residential developments in line with other town centre uses;
 - Mods 2-4: These modifications seem to amend the text relating to the housing trajectory and previously developed land scenarios to more fully reflect the NPPG, PPG, representations and discussions at the hearing sessions, including an amended housing trajectory;
 - Mod 5: This modification seems to reflect the amended settlement hierarchy and confirm that the housing target is a minimum figure;
 - Mod 6: This modification seems to reflect the latest national policy confirming that there is no longer a need to include a brownfield land trajectory;
- j. **Additional Main Modifications**
- Strategic Objective 2 should confirm that the district's needs for housing, business and commerce will be fully met;
 - Housing: Policy HO4: The accompanying text should explain that a 20% buffer has been added to the 5 year housing supply target in the housing trajectory, and confirm the Council's approach to meeting the previous backlog (either within the first 5 years or over the whole plan period, as set out in PS/F061-063);

- Housing: Policy HO12: Further amendments to the policy, pitch/plot requirements and the accompanying text may be needed as result of the updated GTAA, as set out in PS/F064, and in order to fully meet the requirements of national policy in the Planning Policy for Traveller Sites;

k. **Proposed Minor Modifications**

- The definition of a Minor (or "Additional") Modification is a minor change, which when seen together with the Main Modifications, does not materially affect the policies or strategy of the plan. The Inspector does not need to recommend any Additional Modifications, since these can be made by the Council at any time before the plan is adopted.
- The Inspector has looked through the Schedules of Minor Modifications and agrees that, in most cases, they seem to represent factual corrections or updates (including amendments to national policy) or clarify the text or diagrams in the plan, without altering their sense or application or introducing new requirements. None of these minor amendments would seem to fall into the category of Main Modifications.
- Minor Modifications should be referred to as "Additional Modifications" and should be set out in a single comprehensive schedule with consecutive numbering (AM001-xxx);
- Checks should be made to ensure that all the relevant minor modifications listed in the Schedule of Minor Modifications included with the submitted plan (20/02/15; PS/B004) are incorporated, where necessary.

2. **Future progress**

- a. The Proposed Main Modifications should be set out in a single comprehensive schedule covering all relevant sections of the plan, with consecutive numbering (MM001-xxx);
- b. The Inspector wishes to see the final version of the Schedule of Main Modifications before it is published and consulted on;
- c. The Inspector understands that the Schedule of Main Modifications will not be finalised until the work on reviewing the HRA and updating the GTAA are finalised at the end of July 2015, following consultation with the relevant bodies and representors;
- d. It would be helpful if the Council could prepare a "track-changes" version of the Core Strategy Local Plan so that the Main and Additional Modifications can be seen in context.

3. The Inspector points out that these initial views are intended to assist the Council in preparing the Schedule of Main Modifications and to progress the examination; the "action points" are highlighted in yellow. These initial views are given entirely without any prejudice to any further comments he may make on the final schedule of modifications or to his final conclusions on the soundness of the submitted plan. The Inspector will be pleased to receive the Council's responses to these initial views at the earliest opportunity.

Stephen J Pratt – Development Plan Inspector

8 June 2015