

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

**INSPECTOR'S INFORMAL COMMENTS ON THE COUNCIL'S
SCHEDULE OF PROPOSED MAIN MODIFICATIONS**

1. I have reviewed the latest Schedule of Proposed Main Modifications to the Bradford Local Plan Core Strategy and have the following comments:
 - a. **Section 3: Vision, Objectives and Core Policies**
 - MM1-MM35: These modifications amend Objective 2 to confirm that housing, business and commercial needs will be met in full, and amend Policies SC1, SC3-SC5 & SC7-SC8 and the accompanying text to reflect the revised settlement hierarchy following discussions, further work on the HRA and the revised housing targets for Burley and Menston; they also clarify various aspects of the policy framework, including the updated HRA and revised Policy SC8, and the need to review the Green Belt, and summarise the exceptional circumstances needed to make amendments to the Green Belt.
 - b. **Section 4: Sub-Area Policies**
 - MM36-55: These modifications reflect the amendments to the housing distribution proposed under Policy HO3 for Bradford City, Airedale, Wharfedale and the Pennine Towns and Villages, including Burley, Menston and other settlements and sub-areas, and update the amounts of housing development apportioned to each sub-area and each part of each sub-area; they also clarify the application of the policies and the associated criteria, including the need for amendments to the Green Belt, the recommendations of the revised HRA and the approach to local housing needs, following discussions at the hearing sessions and with key stakeholders and responsible bodies.
 - c. **Section 5.1: Economy and Jobs**
 - MM56-63: These modifications clarify the approach to the "Economic Growth Area" and "Strategic Employment Zones", and provide a clearer indication of the main areas of economic growth, projected jobs growth and the amount and distribution of employment land within the district, with changes to Policies EC1-EC4 and/or the accompanying text.
 - d. **Section 5.3: Housing**
 - MM64-87: These modifications reflect the further work undertaken as part of the Housing Requirement Study and work at the Leeds City Region level, including more recent household projections, and clarify the assessment of market drivers and indicators which informed the Council's objective assessment of housing needs; they also reflect the amended status of Burley and Menston as Local Growth Centres, the revised settlement hierarchy and the amended distribution of housing development across the district and within each sub-area set out in amended Policy HO3, with updated tables, following the revised HRA and discussions at the hearings and with stakeholders and responsible bodies. They also clarify and update the phasing in Policy HO4, reflecting recent work on the AAPs, and confirm that this policy is not intended to prevent other sustainable housing development (windfall) proposals from coming forward; the approach to density is also clarified.
 - MM88-102: These modifications clarify the approach and targets for previously developed/brownfield land, clarify viability considerations and reflect recent changes in national policy on housing standards and renewable/low carbon energy generation; affordable housing thresholds have been retained, following the recent change in national policy, and the requirement for gypsy and traveller pitches has been updated as a result of the recent reassessment of accommodation needs. **It might be helpful if the amendments to Policy HO12 and the accompanying text (MM102) were the subject of separate modifications, for clarity.**
 - e. **Section 5.4: Environment**
 - MM103-119: These modifications clarify and update the overall approach to biodiversity, geodiversity and air quality, following discussions at the hearings and with representatives and responsible bodies, and reflecting the recommendations of the revised HRA, including redrafting Policy SC8 and amending Policies EN1, EN2 &

EN8 and the supporting text; they also clarify the approach to flood risk in Policy EN7, including groundwater flooding, following discussions at the hearings and with responsible bodies, and reflecting updated national guidance on groundwater flooding in the PPG [ID-7-002]. The suggested amendments to Policy EN6 and the accompanying text seem to reflect recent national guidance and ministerial statements relating to wind energy, and confirm that further work will be needed to identify suitable areas and opportunities for low carbon and renewable energy.

f. **Section 5.5: Minerals**

- MM120-126: These modifications clarify and provide additional information about the approach to minerals, including the Local Aggregate Assessment, landbanks and apportionment, as requested earlier; they also clarify the approach to coal and hydrocarbons, delete the requirement relating to the quality of the coal, and clarify the situation where the safeguarding of sandstone would not apply in cases of prior extraction; Policy EN9 is also amended to reflect the recommendations of the latest HRA.

g. **Section 5.6: Waste**

- MM127-135: These modifications clarify and provide additional information about the approach to waste management, including waste arisings, waste management capacities and cross-boundary working, along with policies on waste management, including identifying locations for future waste management facilities and sites, and an Area of Search, in order to provide sufficient strategic framework and spatial direction to the subsequent Waste Management DPD, as requested earlier. **I am not sure whether the beginning of MM128 relates to formatting or is incomplete.**

h. **Section 6: Implementation and Delivery**

- MM136-137: These modifications reflect the recommendations in the updated HRA to assist in delivering mitigation measures related to the South Pennine Moors SPA/SAC.

i. **Section 7: Monitoring**

- MM138: This modification amends the indicator relating to jobs growth, reflecting the changes to Policy EC2.

j. **Appendices**

- MM139-145: These modifications amend and clarify the approach to parking standards and the delivery of previously developed land, and set out the updated housing trajectory, in line with the latest national policy and guidance; they also confirm the approach to past provision and housing land supply, including the approach to meeting the previous backlog of housing provision (opting for the "Liverpool" approach) and the approach to previously developed land, in order to clarify the application of Policy HO4.

k. **Proposed Additional Modifications**

- I have reviewed the Schedule of Additional Modifications and confirm that most of them seem to relate to factual corrections or updating (including amendments to national policy), minor clarifications and corrections to grammar and presentation of the Plan, without altering the sense or application of the policies in the Plan or introducing new requirements; **(there seem to be two references to AM27).**
- However, some of the Additional Modifications seem to clarify the application and approach of particular policies and their requirements/criteria as a result of the updated HRA and views of responsible bodies; **the Council may wish to consider including the following Additional Modifications in the Schedule of Main Modifications: AM4; AM5; AM9; AM14; AM15; AM16; AM18; AM21; AM31.**
- There is no statutory requirement to publish or consult on these Additional Modifications, although it may be helpful to make them available when public consultation is undertaken on the Main Modifications; no representations need to be invited on these additional modifications. The Council can make Additional Modifications at any time prior to the adoption of the Plan.
- **It is also often helpful to produce a "track-changes" version of the amended Local Plan at the public consultation stage,** incorporating and referencing all the suggested amendments (both Main and Additional Modifications) so that they can be seen in the context of the rest of the Plan.

2. These informal views are intended to assist the Council in finalising the Schedule of Main Modifications and to progress the examination; the "action points" are highlighted in yellow. These informal views are given entirely without prejudice to my consideration of representations on the Main Modifications and my final conclusions on the soundness of the submitted plan. I look forward to receiving details about the timetable for public consultation on the Main Modifications in due course.

Stephen J Pratt – Development Plan Inspector

4 November 2015