

**BRADFORD LOCAL PLAN CORE STRATEGY****EXAMINATION IN PUBLIC – PROPOSED MAIN MODIFICATIONS****Response to Inspector’s Matters, Issues and Questions****Made on Behalf of Persimmon Homes (West Yorkshire)  
(Representor ID: 034)*****Matter 1: South Pennine Moors (Policy SC8 and associated policies)*****Preamble**

1. On behalf of our client Persimmon Homes (West Yorkshire), we write to provide comments in response to the Inspector’s schedule of Matters, Issues and Questions in relation to the Bradford Local Plan Core Strategy Proposed Main Modifications. This follows our previous comments made on the Proposed Main Modifications to the Core Strategy in January 2016.
2. Our client is one of the UK’s leading house builders, committed to the highest standards of design, construction and service. They have a large number of site interests across Bradford District and therefore are very keen to engage with the Council and assist in preparing a sound plan which is positively prepared, justified, effective and consistent.

**Persimmon Homes Site Interests in Bradford**

3. This is a list of our areas where our client has site interests:

Wharfedale

- Menston
- Ilkley/Ben Rhydding

Airedale

- Keighley
- Cottingley

Regional City of Bradford including Shipley and Lower Baildon

- Nab Wood (Shipley)
- Heaton (North West Bradford)
- Daisy Hill (North West Bradford)

4. These statements should be read alongside our previous written representations in relation to the emerging Core Strategy.
5. Our response to Matter 1, which covers the South Pennine Moors (Policy SC8 and associated policies), is contained in this statement. The key issue highlighted by the Inspector is:

**“Is the revised approach towards the South Pennine Moors appropriate, effective, positively prepared and justified with soundly based evidence, including the updated Habitat Regulations Assessment, and in line with the latest national guidance and good practice (NPPF/PPG)”**

6. We consider below the specific questions asked by the Inspector:

**a) Is the revised approach towards new development in the South Pennine Moors SPA/SAC and its Zone of Influence appropriate, effective, positively prepared, justified, soundly based and consistent with the latest national policy?**

7. Further to our representations to the proposed Main Modifications to the Core Strategy we consider that the additional work undertaken in respect of the HRA and the revised approach towards new development within the South Pennine Moors SPA/SAC and its Zone of Influence is now acceptable.
8. Policy SC8 is now considered to be sound and meets the tests set out in paragraph 182 of the NPPF.

**b) Is the updated HRA evidence and Sustainability Appraisal soundly based and are there any outstanding issues from Natural England or other relevant parties?**

9. We would reiterate our comments in previous representations to the proposed Main Modifications to the Core Strategy regarding the updated HRA evidence and the approach to the South Pennine Moors SPA/SAC.

**c) Have the implications of the revised approach towards the South Pennine Moors SPA/SCA been reflected in the proposed amendments to the text accompanying Policy SC8 and other associated policies and accompanying text (e.g. Policies WD1 & EN1-EN2)?**

10. As noted above our Client is satisfied that their concerns regarding the initial methodology in the HRA and the 2.5km buffer zone have now been adequately addressed through the proposed main modifications and the additional work that has been undertaken.
11. The acknowledgement that further assessment can take place through the Allocations DPD process is welcomed, as is the increased flexibility over the exact location, scale and nature of development that can take place within the identified Zones of Influence.
12. Furthermore, the acknowledgement that impacts upon foraging birds can be assessed and appropriate mitigation can be proposed is also welcomed and provides greater clarity. It is considered that these amendments have been reflected within the supporting text of Policy SC8.
13. Policy WD1 has been amended to reinstate Menston and Burley-in-Wharfedale as Local Growth Centres, as well as increasing the distribution of housing to Ilkley, which acknowledges the revised HRA work and apportions additional residential development to each settlement accordingly. As noted in our other statements, this approach is welcomed. Menston and Ilkley are highly sustainable settlements with a number of key services and facilities and it was not considered to be reasonable to restrict the level of growth as originally proposed within Publication draft of the Core Strategy. As the level of growth has been increased through the proposed main modifications, Policy WD1 is now considered to be sound.

**d) Have the implications of the revised HRA evidence for the overall strategy, the settlement hierarchy, spatial location and distribution of**

**development and other key aspects of the development strategy been fully considered and explained?**

14. The HRA evidence forms part of a number of factors which determine the overall strategy, the settlement hierarchy, spatial location and distribution of development, and it is therefore difficult to provide certainty on this matter.
  
15. However, as noted above, it is considered that the revised HRA evidence has been fully considered and reflected in regards to the settlement hierarchy and distribution of development within the Wharfedale sub-area, particularly the classification of Menston as a Local Growth Centre and the subsequent increase in housing distribution to the settlement and the increasing in housing provision within Ilkley, to reflect its role as a principal town with a number of key services and facilities.