

BRADFORD LOCAL PLAN CORE STRATEGY

EXAMINATION IN PUBLIC – PROPOSED MAIN MODIFICATIONS

Response to Inspector's Matters, Issues and Questions

Made on Behalf of Harworth Estates Investments Ltd (Representor ID: 109)

Matter 1: South Pennine Moors (Policy SC8 and associated policies)

Preamble

1. Harworth Estates ("our client") is one of the largest landowners in the North of England and the Midlands and a leading property developer, based at the flagship Waverley development site in the heart of the Sheffield City Region. Our client's flagship sites are of national economic significance and are at the forefront of regeneration in the UK. In addition to transforming its former coalfield sites, Our client also manages a portfolio of strategic land with the ultimate aim of delivering high quality and sustainable developments. Our client has land interests within Bradford District including within the settlement of Haworth and is therefore keen to engage with the Council and Inspector to assist in preparing a sound plan which is positively prepared, justified, effective and consistent with national planning policy.
2. This statement should be read alongside our previous written representations and Promotional Document submitted in relation to land at Sun Street, SHLAA Reference HA/013 which Harworth Estates has an interest in.
3. Our client's 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)"

4. 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?

5. Our client has land interests in Haworth which is affected by the Habitat Regulations Assessment (HRA) due to its location within 2.5km of the South Pennine Moors SPA/SAC.
6. We would reiterate our comments within our representations to the proposed Main Modifications to the Core Strategy, in which our client welcomes the Council's changes to Policy SC8 following the revised HRA. In particular, the acknowledgement that caution should be applied to the findings within the HRA regarding foraging birds and that further assessment can and should be undertaken regarding this matter at the Site Allocations stage.
7. The removal of the precautionary approach to development within the Zone Bi as originally set out in the Publication version of the Core Strategy and the acknowledgement that effects of development on foraging birds can be mitigated is welcomed and this is considered to represent a more effective, justified and positive approach to the Policy and as such it is now considered to be sound.
8. Similarly, the amendment of the Policy to allow landowners and developers greater flexibility to provide evidence that development of sites will not adversely impact upon the SPA and SCA is supported.

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 look forward to hearing the Council's comments on this matter at the hearings. We reserve the right to make further comments in response at that stage.

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 its concerns regarding the initial methodology in the HRA and the 2.5km buffer zone have now been adequately addressed through the additional work undertaken which is adequately reflected in the proposed main modifications to Policy SC8 and the accompanying text.
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. It is therefore considered that Policies SC8, EN1 and EN2 have all been adequately amended to take account of the revised HRA work.

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. We reserve the right to make further comments at the Hearing Session on this matter once we have seen the Council's detailed response and explanation.
15. However, it is noted that the Council have increased housing distribution and reclassified certain settlements as a result of the less precautionary approach to the HRA and the South Pennine Moors SPA/SCA, but similar changes have not been reflected within Haworth, which is not considered to be one of the settlements most affected by the HRA. As such the spatial location and distribution of housing should reflect this, as per our comments regarding Matter 3.