

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 3: Revised Spatial Distribution of Development – Haworth*****Homework Item 7**

1. Further to our representations and the discussion at the 18th May 2016 Hearing Session, the Inspector asked the Council to provide clarification on the sites (and number of dwellings) referred to by Historic England and the Council in relation to Haworth and to submit any correspondence with Historic England on the matter to the Examination library.
2. A Further Statement has been issued by the Council on the matter. Having read the Statement, we remain of the view that the approach undertaken (which has resulted in the proposed reduction of dwellings for Haworth) is unsound for reasons set out below.
3. This Statement should be read in conjunction with our previous EiP Statements which cover the issue in detail.

Clarification from the Council

4. The Council's latest Statement states that Historic England has concerns relating to 5 no. sites (which are referred to in an email to the Council dated 6th May 2016) as follows:
 - HA/011 – Sun Street, Haworth (38 dwellings)
 - HA014 – Weavers Hill (112 dwellings)
 - HA/010 – Ivy Bank Lane (66 dwellings)
 - HA/009 – Bridgehouse Mills (60 dwellings)
 - HA/022 – West Lane (26 dwellings)

5. The fact that one of the sites which Historic England raises concerns about already has planning permission and another is subject to a planning application demonstrates that a cursory desk top approach to assessing whether the development of a site would result in unacceptable heritage impacts is not robust and sites can be developed acceptably when there is site specific assessment and evidence available on heritage matters e.g. via design and mitigation. The issue therefore needs to be addressed at the site allocations or planning application stage.
6. The Council's Statement also advises that officers have discounted the yield of several of the aforementioned sites following discussions with its Conservation Team (we have not seen any evidence relating to these discussions). This was done on the basis that officers considered that some of the sites could indeed lead to adverse effects.
7. It is noted that the site which is subject to a planning application is seeking consent for a significantly higher yield (77 dwellings plus 46 retirement living apartments) than is assumed in the SHLAA (60 dwellings) which demonstrates that a discounting approach is not reliable.
8. We remain highly concerned by the approach undertaken which has not been transparent or sound. No methodology, assessment or rationale has been published relating to the Council's decision to apply a discounting of the yield on certain sites and as far as we can ascertain this has only been done in relation to Haworth and not other settlements. This in itself is perverse given that a number of other settlements contained conservation areas and heritage assets within them.
9. Historic England claims that the Council has not demonstrated that the growth proposals for Haworth can be accommodated. Yet equally there has been no evidence demonstrating that 500 houses cannot be accommodated due to harm to the historic environment. Indeed the evidence available indicates the contrary. For example, sites that Historic England have objected to have nonetheless secured planning permission for housing with the number of units reflecting the yield within the SHLAA. In addition the Council's own independent evidence base (the Growth Assessment) concludes that heritage is not identified as a constraint which is likely to limit the extent of development at Haworth (whereas it is for other settlements such as Oxenhope).
10. As such the proposed Main Modification clearly fails to be sound on the basis it is not justified and is not positively prepared and could be open to legal challenge.

11. Pursuant to the above, we remain strongly of the view that the housing target for Haworth should be 500 dwellings on the basis that this is the most appropriate and reasonable strategy in light of the available evidence.