

Core Strategy - Proposed Main Modifications
 Development Plans Group
 City of Bradford Metropolitan District Council
 2nd Floor South - Jacobs Well
 Nelson Street
 Bradford BD1 5RW

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17 December 2015

Dear Sirs,

Bradford Core Strategy DPD – Proposed main Modifications

Thank you for consulting Historic England about the Main Modifications to the Core Strategy. We have the following comments to make regarding the proposed changes to the Plan:-

Mod. No.	Section	Sound/ Unsound	Comments	Suggested Change
MM13	Paragraph 3.80	Minor correction	This Modification needs a slight amendment to remove an unnecessary word.	Amend to read:- <i>“It is a Policy which only applies to the production of site allocating DPDs”.</i>
MM38	Sub Area Policy BD1, Criterion A, Shipley	Sound	The suggested change in the housing requirements for Shipley now provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire. It is considered that the housing requirements for Shipley are now likely to be compatible with both national	-

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			policy guidance and the plan's own Policies for the protection of the historic environment.	
MM42	Sub Area Policy BD1, Criterion C.	Sound	Despite the reduction in the number of houses likely to come forward in the Shipley area, nevertheless, it is essential that any sites which are selected as allocations and their design do not harm those elements which contribute to the Outstanding Universal Value of Saltaire. The Proposed Modification makes clear the need for any proposals to have due regard to the World Heritage Site.	-
MM43	Sub Area Policy BD1, Criterion E.5.	Sound	<p>This Proposed Modification now identifies which particular aspects of the heritage are of especial importance in this part of the District.</p> <p>We particularly welcome the reference to the Registered Battlefield at Adwalton Moor. As the NPPF makes clear, Registered Battlefields are included within the group of designated heritage assets which the Government considers to be of the highest significance where loss or substantial harm should be wholly exceptional. However, despite Adwalton being only one of seven Registered Battlefields in Yorkshire, it was not referred to anywhere within the plan's Policies and, potentially, could be affected by the Urban Extension at Holme Farm.</p>	-
MM44	Sub Area Policy AD1, Criterion A, Baildon	Sound	The suggested change in the housing requirements for Baildon now provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without	-

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			<p>requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire.</p> <p>It is considered that the housing requirements for Baildon are now likely to be compatible with both national policy guidance and the plan's own Policies for the protection of the historic environment.</p>	
MM49	Sub Area Policy AD1, Criterion D.6.	Sound	This Proposed Modification now identifies which particular aspects of the heritage are of especial importance to the distinctive character of this part of the District.	-
MM54	Sub Area Policy WD1, Criterion D5.	Sound	This Proposed Modification now identifies which particular aspects of the heritage are of especial importance to the distinctive character of this part of the District.	-
MM56	Sub Area Policy PN1, Criterion A, Howarth	Sound	<p>The suggested change in the housing requirements for Howarth now provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which contribute to the character and landscape setting of this important settlement.</p> <p>It is considered that the housing requirements for Howarth are now likely to be compatible with both national policy guidance and the plan's own Policies for the protection of the historic environment.</p>	
MM59	Sub Area	Sound	This Proposed Modification now	-

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	Policy PN1, Criterion E.4.		identifies which particular aspects of the heritage are of especial importance to the distinctive character of this part of the District.	
MM77	TableHO4	Sound	<p>The suggested change in the housing requirements for Shipley now provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire.</p> <p>It is considered that the housing requirements for Shipley are now likely to be compatible with both national policy guidance and the plan's own Policies for the protection of the historic environment.</p>	-
MM79	Paragraph 5.3.60	Sound	The Proposed Modification reflects the reduction in the housing requirements for Shipley which is necessary in order provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire.	-
MM85	TableHO7	Sound	The suggested change in the housing requirements for Baildon and Howarth now provide a greater degree of confidence that sufficient land will be able to be identified to meet their respective totals without harming the Outstanding Universal Value of Saltaire in the case of the former, or the character and landscape setting of	-

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			<p>Howarth in the case of the latter.</p> <p>It is considered that the housing requirements for both these settlements are now likely to be compatible with both national policy guidance and the plan's own Policies for the protection of the historic environment.</p>	
MM87	Policy HO3	Sound	<p>The suggested change in the housing requirements for Shipley now provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire.</p> <p>It is considered that the housing requirements for Shipley are now likely to be compatible with both national policy guidance and the plan's own Policies for the protection of the historic environment.</p>	-
MM88	Policy HO3	Sound	<p>The suggested change in the housing requirements for Baildon and Howarth now provide a greater degree of confidence that sufficient land will be able to be identified to meet their respective totals without harming the Outstanding Universal Value of Saltaire in the case of the former, or the character and landscape setting of Howarth in the case of the latter.</p> <p>It is considered that the housing requirements for both these settlements are now likely to be compatible with both national policy guidance and the</p>	-

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			plan's own Policies for the protection of the historic environment.	
MM121	Paragraph 5.4.66	Sound	This Proposed Change more accurately explains how the significance of heritage assets can be harmed through neglect and other incremental alterations.	-
MM137	Policy EN12, Criterion B.4	Sound	This Proposed change clarifies the purpose of this Criterion.	-

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,

 **Smith**
Historic Environment Planning Adviser (Yorkshire)

