

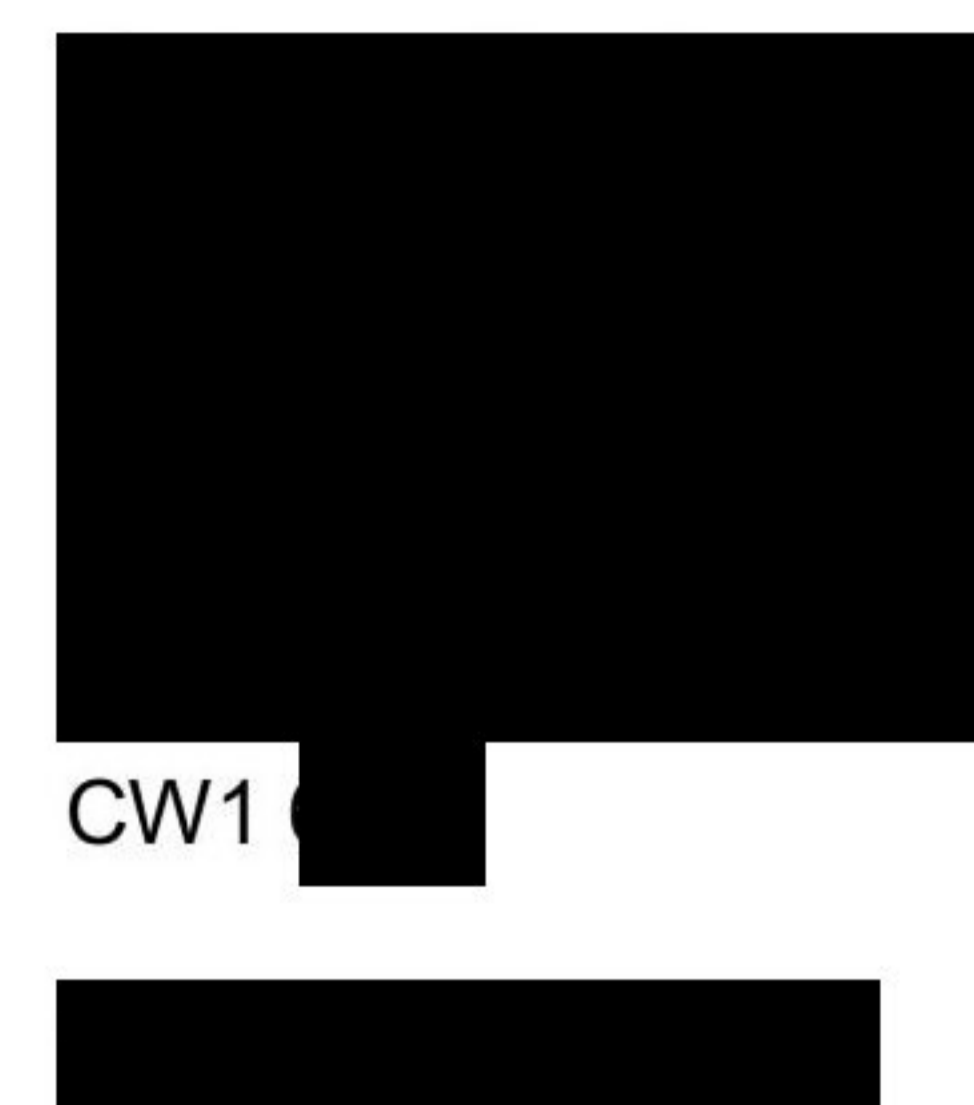
Date: 14 January 2016

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[REDACTED]

City of Bradford Metropolitan District Council
2nd Floor South
Jacobs Well
Bradford
BD1 5RW



BY EMAIL ONLY

Dear Sir/Madam

Planning consultation: Local Plan for the Bradford District - Core Strategy Development Plan Document - Proposed Main Modifications Consultation **Location:** Bradford

Thank you for your consultation on the above dated 25 November 2015 which was received by Natural England on 25 November 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England recognises that comments at this stage of the plan making process should be based on the Tests of Soundness as set out in paragraph 182 of the National Planning Policy Framework (NPPF). A separate statement on the Habitat Regulation Assessment (proposed modifications) is given below. Having reviewed the proposed modifications Natural England considers them broadly compliant with national policies that seek to conserve and enhance the natural environment. We have set out below a small number of amendments which will enable your authority to ensure that the plan meets the tests of soundness. These are set out below:

MM20 – Natural England recommends the 4th bullet point be amended as follows:

- *Recreational impacts, including the effects of walkers such as trampling, dogs and erosion and*

MM23, 24, 25, 26 – Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).

MM28 – Natural England welcomes the re-drafted policy SC8. We recommend that the supporting text makes explicit reference to the need for mitigation measures to be put in place 'in perpetuity' as stated in paragraph 5.3.3 of the HRA.

MM30 – It would be helpful to clarify who will be responsible for producing the management plan for the South Pennine Moors SPA/SAC.

MM31, 32, 33, 34, 35, 36 - Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).

MM37 – Natural England recommends that paragraph 3.121 should be amended to make explicit reference to the need for the provision of greenspaces and visitor and access management to be provided and maintained in perpetuity as stated in paragraph 5.3.3 of the HRA: *‘The evidence base for the forthcoming SPD will inform the identification and delivery of opportunities for additional greenspaces, improvements to existing areas and visitor access and management measures which will be secured in perpetuity.’*

MM48 - Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).

MM53 - Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).

MM58 - Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).

MM76 - Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).

MM84 - Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).

MM113 - Natural England welcomes the clarification to paragraph 5.3.17 which is in line with the modified Habitats Regulations Assessment (HRA).

MM114 – Natural England welcomes the additional criterion in policy EN1.

MM115 – Natural England welcomes the further clarification provided by the additional text proposed which reflects the avoid, mitigate, compensate hierarchy set out in the NPPF.

MM116 - Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).

MM117 - Natural England welcomes the new criterion B which reflects the policy set out in the NPPF for the protection of Sites of Special Scientific Interest (SSSI).

MM118 – Natural England welcomes the proposed modifications to Policy EN2 Criterion B.

MM120 – Natural England welcomes the amendments to aid clarity.

MM124 – Natural England welcomes the inclusion of reference to the West Yorkshire Ecology guidance on small turbines and the addition of the landscape character areas as a tool.

MM130 – Natural England welcomes this new paragraph to outline the Council intends to take with respect to assessing potential area quality impacts on European sites designated for nature conservation importance.

MM131, 132 - Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).

MM146 – Natural England welcomes the inclusion of the new supporting text in paragraph 5.6.29.

MM147, 148 - Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).

Addendum Report – Sustainability report for Bradford Core Strategy.

Natural England welcomes the consideration of alternatives for Policy SC8 in the light of the Wealden Case judgement. We concur with the conclusions drawn in section 3.2 of the report that using the zones of influence set out in the proposed policy SC8 would achieve more effective mitigation and provide the degree of certainty necessary to conclude that the Core Strategy will not have an adverse effect on the integrity of the South Pennine Moors SPA/SAC.

Habitats Regulations Assessment (Proposed Modifications)

Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has undertaken an Appropriate Assessment of the proposed modifications, in accordance with Regulation 61 of the Regulations. Natural England is a statutory consultee on the Appropriate Assessment stage of the Habitats Regulations Assessment process.

It is acknowledged that your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the revised assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately developed and secured in any permission given .

For any queries relating to the specific advice in this letter only please contact [REDACTED] or [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED]

Yours sincerely

[REDACTED] Keatley
Team Leader
South & West Yorkshire team
Yorkshire and northern Lincolnshire