

Development Plans Team  
City of Bradford Metropolitan District Council  
2<sup>nd</sup> Floor South  
Jacob's Well  
Bradford  
BD1 5RW



[REDACTED]  
Your ref:

19 January 2016

Dear Sir/Madam

**LOCAL PLAN FOR THE BRADFORD DISTRICT – CORE STRATEGY DPD –  
PROPOSED MAIN MODIFICATIONS**

Thank you for consulting us on the proposed main modifications of the Core Strategy DPD which we received on 25 November 2015. Our comments are as follows:

Modifications to Growth Strategy

As a result of the outcomes of the Habitats Regulations Assessment, changes to the distribution of housing development are proposed. Whilst it is proposed that there is an overall decrease in housing numbers from 28,650 to 27,750 dwellings, there are increases in particular settlements such as Ilkely (800 to 1000), Burley in Wharfedale (200 to 700), Menston (400 to 600) and Silsden (1000 to 1200).

The council prepared a document entitled 'Approach to sequential testing of the strategy set out in the Publication Draft Core Strategy for Bradford'. We provided comments on this document in March 2015 and confirmed that subject to a few minor amendments that we considered the document would usefully serve as supporting evidence to demonstrate that the council has taken a sequential approach in relation to the avoidance of flood risk in the development of its strategy for growth. We confirmed that as such the document would address our recommendations in our letter dated 31 March 2014 under the heading Sequential Test.

Now that the council propose to amend the distribution of housing development, it is equally important that the council's approach to the sequential testing of the revised strategy is evidenced, to ensure compliance with the NPPF. We recommend that the council re-visit the above mentioned document and set out clearly how a sequential, risk-based approach to the revised distribution strategy of development has been applied.

MM13, page 8

Minor grammatical point - the word 'both' needs to be removed to make the sentence read properly.



MM50, page 35

Given the issues relating to capacity of the Aire Valley Trunk Sewer in this area, we welcome and support the additional criterion for investment in Airedale.

MM105, page 80

The inclusion of the recognition of the vulnerability to flooding of a site and how this could impact on the deliverability of accessible homes is welcomed.

MM120, page 101

We support the additional paragraph aimed at protecting biodiversity networks and wildlife corridors.

MM127, and MM128, pages 106-107

We note the proposed changes to Policy ENV7 relating to flood risk and can confirm that we have no objections to the proposed modifications.

Section 5.6 – Waste

We have no objection to the proposed modifications.

We note that evidence has been added, including headline waste arisings and capacity gap figures which are backed up by a needs assessment document and a forecast model. Whilst we are not in a position to comment on the accuracy of these, the data sources and methods used are reasonably up to date and appropriate.

Agricultural waste is placed at the top of the arisings table WM1. This has potential to cause confusion as most of this waste is organic and is usually dealt with on the farm. Therefore it does not have to be planned for in the same way as commercial waste. This is stated further down the document but perhaps a foot note would help.

If you wish to discuss any of these comments please contact me on the details below.

Yours sincerely

**Mrs [REDACTED] Lambert**  
**Sustainable Places – Planning Adviser**

