

## Proposed Main Modifications Composite June 2016

The following main modifications are changes that have arisen through the Examination Process and are required to ensure that a Local Plan is sound and capable of adoption. The source of the changes incorporate Main Modifications as published as well as the changes proposed following the further hearings held in May 2016

In terms of presentation, the deletion of text is denoted with a bold 'strike through' (~~strike through~~), with inserted new text as bold underlined (**new text**).

Page and paragraph numbers relate to the Publication Draft Core Strategy as submitted: Submission Document reference SD001

### Section 3 Vision, Objectives and Core Policies

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <b><u>underlined</u></b> Deleted text <del>strike through</del>
MM1	Page 27	Objective 2	Amend objective 2, as follows:  2. To ensure that the district's needs for housing, business and commerce are met <b><u>in full</u></b> in sustainable locations that reduce the need to travel and are well served by public and services, whilst prioritising, the use of deliverable and developable previously developed land. In so doing overcrowding within the existing housing stock should be reduced.
MM2	Page 31	Policy SC1 Part B5	Amend the wording as follows:  '5. Support, protect and enhance the roles of the Principal Towns of Ilkley, Keighley and Bingley and the Local Growth Centres of <b><u>Burley in Wharfedale, Menston,</u></b> Queensbury, Thornton, Silsden and Steeton with Eastburn as hubs for the local economy, housing and community and social infrastructure and encourage diversification of the rural economy of the district.'
MM3	Page 31	Policy SC1 Part B6	Amend the wording as follows:

			'6. Support the Local Service Centres as defined in Policy SC4 <del>in providing to meet local needs</del> for homes and local services.
MM4	Page 32	Paragraph 3.20 in support of Policy SC1	Add following text at end of paragraph 3.20:  <b><u>'Criterion B (5), refers to supporting key hubs, these comprise a series of networks or convergence of functions of the individual towns and local centres where the growth of the local economy, an increase in the supply of housing and the development of the social structure of the community are all interrelated. The various components of the settlement when considered and addressed as a whole, can lead to a more balanced and sustainable centre. These locations, through their connected activity, will provide an important focal point for services, facilities and employment and cultural activity, improving their performance, management and attractiveness.'</u></b>
MM5	Page 38	Policy SC3 Working Together	Amend introductory text under criterion A as follows:  'A. Effective collaboration between the Council, adjoining local planning authorities, the District's Town and Parish Councils, partners, <b><u>stakeholders</u></b> and communities within the District, Leeds City Region and beyond, particularly to:'
MM6	Page 38	Policy SC3 Working Together	Amend criterion 6, as follows  '6. Achieve effective environmental management and enhancement <b>and in order to</b> address climate change.
MM7	Page 42	Policy SC4	Amend parts A and B of the policy relating to the Local Growth Centres:  'Local Growth Centres  A. <b><u>Burley in Wharfedale, Menston, Queensbury, and Thornton, Steeton with Eastburn and Silsden</u></b> are <b><u>the most</u></b> sustainable local centres <b>and</b> accessible <b><u>to higher order settlements such as Bradford, Keighley and Ilkley.</u></b> <del>to the Regional City of Bradford and Steeton with Eastburn, and Silsden, are sustainable local centres within Airedale.</del> All are located along key <b><u>road and</u></b> public transport corridors and should therefore make a

			<p>significant contribution to meeting the districts needs for housing, employment and provide for supporting community facilities.</p> <p>B. The roles of <b>Burley in Wharfedale, Menston</b>, Steeton with Eastburn, Silsden, Queensbury and Thornton as accessible, attractive and vibrant places to live, work and invest should be enhanced.’</p>
MM8	Page 43	Policy SC4	<p>Amend the first paragraph of the ‘Local Service Centres’ section of Policy SC4 as follows:</p> <p>Local Service Centres and Rural Areas</p> <p>Within the Local Service Centres of Addingham, Baildon, <b>Burley In Wharfedale</b>, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, <b>Menston</b>, Oakworth, Oxenhope, Wilsden the emphasis will be on <b>a smaller scale of developments which meet local needs comprising both market and affordable housing</b> together with the protection and enhancement of those centres as attractive and vibrant places and communities, providing quality of place and excellent environmental, economic and social conditions.</p> <p>Planning decisions and plans, strategies, investment decisions and programmes should seek to:</p> <ol style="list-style-type: none"> <li>1. Achieve a high standard of design that protects and enhances settlement and landscape diversity and character.</li> <li>2. Support innovative means of accessing and delivering services and the reduction of isolation particularly through the development of high speed broadband access in rural areas.</li> <li>3. Retain and improve local services and facilities, particularly in Local Service Centres.</li> <li>4. Support economic diversification, including leisure and tourism offer, live work and home working.</li> <li>5. <del>Meet local needs for both market and affordable housing.</del></li> <li>56. Create new and improve existing green areas, networks and corridors including the urban fringe to enhance biodiversity and recreation.</li> <li>67. Improve public transport links between Local Service Centres and to the Regional City of Bradford, Principal Towns of Ilkley, Keighley and Bingley, the Regional City of Leeds, and the Principal Towns of Halifax and Skipton.</li> </ol>
MM8 (continued )			
MM9	Page 44	Outcomes table for Policy SC4	Amend the outcomes table linked to Policy SC4 as follows:

			<p><b>Burley in Wharfedale, Menston</b>, Steeton with Eastburn, Silsden, Queensbury and Thornton will have made a significant contribution to meeting the districts needs for housing, employment and associated community facilities.</p> <p>Addingham, Baildon, <del>Burley in Wharfedale</del>, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, <del>Menston</del>, Oakworth, Oxenhope, Wilsden and rural areas will have seen a smaller scale of development to meet local needs.'</p>
MM10	Page 44-45	Paragraph 3.62	<p>Amend paragraph 3.62 as follows:</p> <p>Focusing development, investment and activity on the Regional City of Bradford, Shipley and Lower Baildon offers the greatest scope to: re-use land and buildings; make the most of existing infrastructure and investment; reduce greenhouse gas emissions and related impacts by reducing the need to travel; maximise accessibility between homes, services and jobs; foster wide-ranging inclusion and, encourage the use of public transport. Approximately 68% of the district's housing development is planned for the Regional City under the proposals of Policy HO3. While this reflects the fact that the Regional City is likely to see the greatest rate of increase in the need for housing, the Plan envisages that there will need to be a modest degree of dispersal of housing growth to other settlements to reflect the land supply limitations in the Regional City to ensure that growth and regeneration is also fostered in the Principal Towns and to ensure that <b>appropriate sufficient</b> provision <b>of a smaller scale</b> is made for <b>market and</b> affordable <b>and local needs</b> housing in the Local Growth and Local Service Centres.'</p>
MM11	Page 47	Paragraph 3.71	<p>Amend paragraph 3.71 as follows:</p> <p>'The Local Growth Centres within the district are, <b>Burley in Wharfedale, Menston</b>, Steeton with Eastburn, Silsden, Queensbury and Thornton, as identified on the Core Strategy Key Diagram and in the Sub Areas in section 4). They <b>are the most sustainable local centres and</b> vary in size and function but fulfil a significant role as settlements along key public transport corridors providing attractive and vibrant places for their surrounding areas. These centres will provide an important focal point for affordable housing and market housing needs as well as employment and associated community facilities - complementing and supporting the roles of the Regional City of Bradford, Sub Regional Town of Halifax and the Principal Towns of Skipton, Ilkley, Keighley and Bingley. This focus supports a pattern of service centres to meet the needs of rural areas and support a balanced pattern of sustainable development across the District with high quality links to Halifax, Skipton and Leeds beyond</p>

			the District boundary.'
MM12	Pages 47 & 48	Paragraphs 3.75 & 3.76	<p>Paragraphs 3.75 and 3.76 be amended as follows:</p> <p>3.75 A much slower pace and scale of growth, compared to urban areas, forms the overall approach in <del>the settlements these parts of the district, with development being focussed on meeting local needs</del> of Addingham, Baildon, <del>Burley In Wharfedale,</del> Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, <del>Menston,</del> Oakworth, Oxenhope, Wilsden. Local Service Centres are the villages that provide services and facilities that serve the needs of, and are accessible to, people living in the surrounding rural areas. Local Service Centres include a range of settlement types and sizes.</p> <p>3.76 The Plan seeks to prevent the unnecessary dispersal of development to smaller settlements and open countryside while <u>allowing for meeting local needs and appropriate</u> limited types of development in the open <del>countryside countryside</del> in line with NPPF.'</p>
MM13	Page 49	Paragraph 3.80	<p>Amend the paragraph as follows:</p> <p>It is a policy which should be applied both to the production of the site allocating DPD's. <del>and also to the consideration of larger windfall proposals which have the potential to frustrate the strategic objectives of this document and or set undesirable precedents for future proposals which individually or cumulatively may do likewise.</del></p>
MM14	Page 49	Policy SC5	<p>Amend the second part of the policy as follows:</p> <p><b><u>Subject to above:</u></b></p> <p>B. In identifying and comparing sites for development, the Local Plan will adopt an accessibility orientated approach to ensure that development:</p> <ol style="list-style-type: none"> <li>1. Makes the best use of existing transport infrastructure and capacity.</li> <li>2. Takes into account capacity constraints and deliverable improvements, particularly in</li> </ol>

			<p>relation to improving and development of the Strategic Road Network including junctions and schemes identified in the spatial vision.</p> <p>3. <b><u>Complies with Meets or can be mitigated in order to meet</u></b> the public transport accessibility criteria set out in Appendix 3 and maximises accessibility by walking and cycling.</p> <p>4. Maximises the use of rail and water for uses generating large freight movements.</p>
MM15	Page 53	Paragraph. 3.93 (supporting text to SC6)	<p>Amend paragraph 3.93 as follows:</p> <p>‘As a strategic core policy GI provides a common thread that links other important issues in the Core Strategy; local resilience to climate change (in relation to the provision of flood water storage, sustainable drainage and urban cooling), sustainable transport and housing, tourism, health and well-being and making space for water. Particular aspects of GI have been developed in the environment theme policies relating to biodiversity, recreation and open space, heritage, design and landscape. <b><u>Providing high quality areas of natural greenspace on a suitable scale will assist in mitigating the adverse effects of increased recreation on the South Pennine Moors SPA/SAC.</u></b>’</p>
MM16	Page 53	Policy SC6 Criterion B	<p>Add new sentence to criterion B, as follows:</p> <p>B. The River Corridors of the Aire and Wharfe and the South Pennine Moors are identified as strategic Green Infrastructure assets due to the opportunities offered to enhance the living landscape as a resource for people and wildlife and to address future needs for flood alleviation, water management, carbon capture and recreation. <b><u>Mitigating the adverse effects of increased recreation upon the South Pennine Moors SPA/ SAC will be a priority.</u></b></p>
MM17	Page 57	Policy SC7 Green Belt	<p>Amended criterion B:</p> <p>B. <b><u>Exceptional Circumstances require</u></b> Green belt releases <b><u>required in order</u></b> to deliver <b><u>in full the</u></b> longer term housing and jobs growth in the District as set out in Policy HO3 and Policy EC3. <b><u>These changes</u></b> will be delivered by a selective review of Green Belt boundaries</p>

			in locations that would not undermine the strategic function of green belt within the Leeds City Region and that would accord with the Core policies and the strategic patterns of development set out in <b>Policy Policies SC5 and SC4</b> . The Decisions on allocations on green belt land will be assessed against the purposes of including land in green belt as set out in national guidance. The selective review will be undertaken through the Allocations DPD in consultation with local communities and stakeholders.
MM18	Page 57	Paragraph 3.102 under Policy SC7 Green Belt	<p>Amend paragraph 3.102, and split to form new paragraph 3.103, as follows:</p> <p>3.102 The general extent of the Green Belt in the District is shown on the Key Diagram. In general the Districts Green Belt has helped to achieve the aims set out in NPPF. <b><u>However, The Council considers, having reviewed the evidence and all reasonable alternatives, that exceptional circumstances exist which justify and require a change to the green belt. in order to meet its development needs for housing in full and in order to support long term economic success of the district. It is clear based on the land supply in the SHLAA that in order to meet the Housing requirement under policy HO1 in full would necessitate change to green belt to accommodate around 11,000 dwellings, given land supply constraints in non green belt land. This is supported by evidence in the growth study that land is available in the green belt in sustainable locations which would also not prejudice the strategic function of green belt. The evidence from the Employment Land Review suggests a limited mix of land of the right size and locations to ensure a quality offer for the plan period with only around 50 Hectares considered still suitable. To this end the plan under Policy EC3 identifies a new land supply of at least 135 hectares needs to be allocated which includes at least 84 hectares of new land currently not within the known supply. To this end the policy identifies 3 strategic areas which reflect key market locations where land could be made available in order to ensure a suitable offer of deliverable large sites in good market locations which are not available within the land supply in non green belt locations.</u></b></p> <p><b><u>3.103 Therefore, the</u></b> implementation of the Core Strategy will require, a change to the general extent of the Green Belt through the Allocations DPD in order to fully meet its development needs within the plan period to 2030 as set out in policies HO1, HO3 and EC3, as well as ensuring a green belt which lasts beyond the plan period. Based upon the current evidence of need and land supply a selective review of the green belt is required to meet the unmet needs which cannot be accommodated in non green belt areas. Localised changes to the Green Belt will be made in sustainable locations to meet identifiable development needs for which locations within the</p>

MM18 (Continued)			Regional City of Bradford, the Principal Towns, Local Growth Centres and Local Service Centres are not available. Any such changes will be considered in the context of policies SC1 – SC5, and is allowed for by policy SC7B.
MM19	Page 58	Protecting the South Pennine Moors and their zone of influence Paragraph 3.104	Amend paragraph 3.104 as follows  '3.104 <b><u>Assessment under the Habitats Regulations is an integral part of preparing a plan and is necessary to ensure that the plan in question does not lead to adverse effects on the integrity of any European site through impacts on any species, species assemblage and/or habitats for which the European site is designated.</u></b> The NPPF recognises the importance of the Habitat Regulations by stating in paragraph 119 that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined. The <del>Appropriate</del> Assessment of the <del>Further Engagement Draft</del> Core Strategy, required under the Habitat Regulations, assessed the potential impacts of policies and proposals in the plan on four nature conservation sites of European importance, the North and South Pennine Moors SAC and SPA.'
MM20	Page 58	Paragraph 3.105 Supporting Policy SC8 Protecting the South Pennine Moors and their zone of influence	Amend paragraph 3.105 as follows  <del>'Potential for adverse effects on European Sites was identified via the following impact pathways: The assessment identified a range of likely significant effects that could result from the Core Strategy:</del>  <ul style="list-style-type: none"> <li>• Loss of supporting habitats (<b><u>directly or indirectly</u></b>)</li> <li>• Increased emissions to air <del>from road traffic</del></li> <li>• Collision mortality risk and/ or displacement from wind turbine developments</li> <li>• Recreational impacts, <b><u>including walkers, dogs, trampling and erosion and</u></b></li> <li>• Urban edge effects, including fly-tipping, invasive species, wildfire and increased cat predation. '</li> </ul>
MM21	Page 58	Paragraph 3.106	Amend paragraph 3.106 as follows

			<b><u>'Following recommendations, data was gathered to allow further assessment of loss of supporting habitat and recreational impacts on the South Pennine Moors.</u></b> The distribution and magnitude of impacts differs between the four designated areas. <b><u>Evidence is presented in HRA Reports to indicate that, if left unmitigated,</u></b> impacts are likely to be of a greater magnitude in relation to South Pennine Moors sites due to their relative proximity and accessibility to development proposed within the district. '
MM22	Page 58/59	Paragraph 3.107	Delete paragraph 3.107 and renumber subsequent paragraphs:  <del>'The Draft HRA Report identified a range of actions that could help to avoid or mitigate the adverse effects of the Core Strategy. It recommended adjusting the scale and spatial distribution of development in order to achieve a position where adverse impacts on the South Pennine Moors SAC and SPA were capable of being avoided, managed and mitigated. It focused attention on the combined total of new dwellings over the plan period for the settlements of Addingham, Ilkley, Burley in Wharfedale, Menston, Bingley, East Morton, Silsden, Keighley and Worth Valley, that all fall within approximately 2.5km of the South Pennine Moors SPA and SAC.'</del>
MM23	Page 59	Paragraph 3.108	Amend paragraph 3.108 ( and renumber) as follows:  <del>'The zone lying within 2.5km of the <b>South Pennine Moors</b> SPA and SAC was identified in the HRA Report as the area most frequently utilised by SPA <b>qualifying</b> species. <b>and where supporting high quality habitat of particular importance was to be found.</b> To improve understanding of the use of the moorland fringe by birds of the SPA, surveys were undertaken to record bird activity. <b>And the distribution of potentially important supporting habitats. While caution needs to be applied to the baseline survey and assessment work that has been carried out to date in relation to definitively identifying areas of importance for foraging birds, it is considered to be adequate for the purposes of a strategic plan. Sites have been identified which may be of importance and further assessment can take place at the allocations stage.'</b></del>
MM24	Page 59	Paragraph 3.109	Delete paragraph 3.109:  <del>'The broad 2.5km zone of influence was mapped and attention focused on the extent to which this encompasses the entire outer edge of a settlement. Based on the findings</del>

			<p><del>of the bird and habitat surveys and on the need to achieve some reduction in the overall numbers of houses that need to be accommodated within areas of greatest sensitivity, adjustments have been made to the overall distribution of development.</del></p> <p>Replace with the following renumbered paragraph</p> <p><b><u>'The hierarchy of Habitats Regulations Assessment of plans and policies means that proposals can be subject to further and more detailed assessment when more information is available in a lower tier plan. In the context of the Bradford Core Strategy, based on the information available, sufficient flexibility over the exact location, scale or nature of development needs to be retained to enable adverse effects on site integrity, in relation to the impact pathways identified, to be avoided. The level of mitigation that could be needed, in-combination impacts and the risks associated with having limited data available need to be considered.'</u></b></p>
MM25	Page 59	Paragraph 3.110	<p>Delete paragraph 3.110</p> <p><del>While significant progress has been made in adjusting the scale and distribution of development, a strategic policy needed to be formulated that was capable of addressing outstanding adverse impacts, including elements of both avoidance and management and mitigation measures. The zone adjacent to the South Pennine Moors is evidently an area where change needs to be sensitively managed.</del></p> <p>Replace with the following renumbered paragraph</p> <p><b><u>'Appropriate assessment of the Allocations DPD will need to be able to demonstrate that, in relation to the impact pathways identified, the level of development proposed, including in-combination impacts, will not have an adverse effect on the integrity of the SPA/SAC.'</u></b></p>
MM26	Page 59	Paragraph 3.111	<p>Amend paragraph 3.111 ( and renumber) as follows:</p> <p>'The information in the HRA Report justifies setting out a broad zone of influence policy and the identification of <del>precautionary parameters in relation to the carrying capacity of zones around the site and</del> avoidance and mitigation measures. The purpose of the policy set out below <b>and the overall approach</b> is to avoid potential adverse impacts on the South</p>

			Pennine Moors SPA and SAC, yet to allow development to take place in locations and on a scale where potential impacts are at such a level that there is confidence <del>they can be avoided and managed.</del> <b><u>that avoidance and mitigation measures can be effective.</u></b>
MM27	Page 59	Paragraph 3.112	Amend paragraph 3.112 ( and renumber) as follows:  ‘A wide range of policies contribute towards an overall approach of avoidance of impacts and management and mitigation measures; Strategic Core Policy 2 Climate Change and Resource Use, Strategic Core Policy 6 Green Infrastructure, Policies EN 1 and 2 relating to Open Space and Biodiversity and <del>a number of policies in the Transport section. Where direct impact pathways were identified, such as HO3 Housing Distribution and Policy EN6 Energy then a link has been made and amendments.</del> ’
MM28	Page 59	SC8 Protecting the South Pennine Moors and their zone of influence	Delete Policy SC8 in full and replace with comprehensively redrafted policy as follows:  ‘Strategic Core Policy (SC8): Protecting the South Pennine Moors <b><u>SPA and the South Pennine Moors SAC</u></b> and their zone of influence  <b><u>In this Policy:</u></b>  <b><u>Zone A is land up to 400m from the South Pennine Moors Special Protection Area (“SPA”) and South Pennine Moors Special Area of Conservation (“SAC”) boundary;</u></b>  <b><u>Zone B is land up to 2.5km from the SPA and SAC boundary; and.</u></b>  <b><u>Zone C is land up to 7km from the SPA and SAC boundary.</u></b>  <b><u>Subject to the derogation tests of Article 6(4) of the Habitats Directive, in all Zones development will not be permitted where it would be likely to lead, directly or indirectly, to an adverse effect (either alone or in combination with other plans or projects), which cannot be effectively mitigated, upon the integrity of the SPA or the SAC.</u></b>

<p>MM28 (Continued)</p>			<p><b><u>In conducting the above assessment the following approach will apply:</u></b></p> <p><b><u>In Zone A no development involving a net increase in dwellings would be permitted unless, as an exception, the development and/or its use would not have an adverse effect upon the integrity of the SPA or SAC.</u></b></p> <p><b><u>In Zone B it will be considered, based on such evidence as may be reasonably required, whether land proposed for development affects foraging habitat for qualifying species of the SPA.</u></b></p> <p><b><u>In Zone C, in respect of residential developments that result in a net increase of one or more dwellings, it will be considered how recreational pressure on the SPA or SAC, that such development might cause, will be effectively mitigated. The mitigation may be:</u></b></p> <p><b><u>(i) such that the developer elects to offer, either on-site and / or deliverable outside the boundary of the development site, such as the provision of accessible natural greenspace and/or other appropriate measures; or</u></b></p> <p><b><u>(ii) in the form of a financial contribution from the developer to:</u></b></p> <ol style="list-style-type: none"> <li>1. the provision of additional natural greenspace and appropriate measures to deflect pressure from moorland habitats and the long-term maintenance and management of that greenspace;</li> <li>2. the implementation of access management measures, which may include further provision of wardens, in order to reduce the impact of visitors;</li> <li>3. a programme of habitat management and manipulation and subsequent monitoring and review of measures.</li> </ol> <p>To mitigate impacts on <del>the SPA and SAC European sites</del> due to the increase in population, an <del>SPD will an approach will be adopted that</del> sets out a mechanism for the calculation of the <u>financial Planning contributions, by reference to development types, the level of predicted recreational impact on the SPA or SAC, and the measures upon which such contributions will be spent.</u></p>
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MM29	Page 60	Outcomes under policy SC8	<p>Outcomes under policy SC8 be amended as follows:</p> <p><del>'No sites have been identified that would have direct potential adverse impacts on European Sites.</del></p> <p><b><u>Sites where mitigation would be required have been identified.'</u></b></p> <p>A range of management and mitigation measures and a funding mechanism have been identified that will allow <b><u>direct and</u></b> indirect impacts to be managed and mitigated.'</p>
MM30	Page 60	Indicators under Policy SC8	<p>Indicators under policy SC8 be amended, as follows:</p> <p><del>Area of upland fringe habitat protected and created.</del></p> <p><b><u>Further survey work has taken place and an approach to mitigation in relation to sites used for foraging by SPA qualifying bird species has been identified.</u></b></p> <p><b><u>An SPD relating to management and mitigation measures and funding has been produced and adopted.</u></b></p> <p>Areas of <del>appropriate</del> <b><u>alternative</u></b> natural greenspace <del>protected</del> <b><u>have been identified for protection.</u></b></p> <p><b><u>Additional</u></b> areas of appropriate <b><u>alternative</u></b> natural greenspace <del>created and maintained</del> <b><u>have been identified and created.</u></b></p> <p><b><u>A site improvement plan has been produced for the South Pennine Moors SPA/SAC by Natural England.</u></b></p>
MM31	Page 61	Paragraph 3.113	<p>Amend paragraph 3.113 ( and renumber) as follows:</p> <p>'The detailed review of available evidence presented in the HRA Report indicates that <del>a precautionary spatial strategy would</del> <b><u>the approach should</u></b> in the first instance seek to restrict residential development within 400m of the SAC/SPA boundary in order to avoid the risk of urban edge effects, <b><u>as set out in Zone A.</u></b> This is because, in most cases it will not be</p>

			possible to be reasonably certain that such adverse effects could be avoided or alleviated at this distance.'
MM32	Page 61	Paragraph 3.115	<p>Amend paragraph 3.115 ( and renumber) as follows:</p> <p>'In relation to Zone B<del>i</del>, the review of the literature relating to the behaviour of SPA <u>qualifying / typical</u> bird species <u>and survey data</u> presented in the HRA Report, <del>suggests that many indicates that a number</del> of species travel as far as 2.5km from the SPA boundary to forage (and in some cases further). The area up to 2.5km from the SPA boundary is referred to as the supporting habitat management zone in the HRA Report. <del>Within this zone, the Report recommends that new development must avoid direct (eg land take) and indirect (eg increased disturbance) impacts on supporting habitats. This has led to a re-assessment of the distribution of development within this zone in order to avoid potential adverse impacts, particularly direct land take. It does not rule out future development, provided an adequate programme of management and mitigation measures have been identified and mechanisms set out to achieve implementation of these. Based on review of the literature, the Report recommendations and early analysis of bird and habitat survey data, a precautionary approach to carrying capacity is necessary within this zone.'</del></p>
MM33	Page 61	Paragraph 3.116	<p>Amend paragraph 3.116 ( and renumber) as follows:</p> <p><del>Early analysis of bird and habitat data has led to the identification of broad areas where development should be avoided. In circumstances where a need for local green belt releases has been identified and where a proportion of land adjoining the settlement lies within the 2.5km zone, the HRA Report recommends that areas of land will need to be identified that feature neither high numbers of birds nor good quality habitats. Consideration will be given to the benefits of identifying compensatory areas of land and</del> <u>Within Zone B, consideration needs to be given to whether land being proposed for development affects the foraging habitat of qualifying bird species, which may involve the collection and assessment of additional data.</u> Further work will seek to ensure that <u>important</u> areas regularly used by <del>these</del> birds can be <u>appropriately</u> protected from development and its associated impacts. <u>Taking forward an approach to identify and deliver mitigation measures, where required within this zone, will form an important element in future planning.</u> '</p>

MM34	Page 61	Paragraph 3.117	<p>Delete paragraph 3.117 and replace with the following renumbered paragraph:</p> <p><b><u>Increased emissions to air were identified as an impact pathway in the HRA Report. However, linking pollution loads to core strategy proposals is not straightforward and at present proposals are not sufficiently specific and data is not available to fully assess the nature of impacts. The HRA Report therefore recommended that more detailed testing and traffic modelling should be undertaken to inform work on the Allocations DPD.</u></b></p>
MM35	Page 61/62	Paragraph 3.118	<p>Delete paragraph 3.118 and replace with the following renumbered paragraph:</p> <p><b><u>Recreational impacts were identified as a key impact pathway and were subject to further investigation. Information presented in the HRA Report identified a range of issues including trampling and erosion, the effects of dogs and disturbance in relation to routes and access points.</u></b></p>
MM36	Page 62	Paragraph 3.119	<p>Amend paragraph 3.119 ( and renumber) as follows</p> <p><b><u>'Zone C in policy SC8 identifies a zone of visitor influence extending up to 7km from the boundary of the South Pennine Moors SPA/SAC based on visitor survey data, using postcode of origin and point of access to the SAC/SPA. Early analysis of data from visitor survey work carried out at a range of key access points to the South Pennine Moors within Bradford District during August and September 2013 has informed the outer limit of this zone. Respondents' postcode data from the 2013 visitor surveys has been geo-referenced using OS Code Point within GIS to generate projections of average distance travelled to site and establish a picture of the zone of influence of visits to the SAC/SPA. Research carried out on distances travelled to visit European Sites for recreation in other parts of the country and supported by Natural England has indicated an average distance travelled to reach the site of between 5 and 7km. The indicative zones are shown in Appendix 14.'</u></b></p>
MM37	Page 62	Paragraph 3.121	<p>Amend paragraph as follows:</p> <p><b><u>The evidence base for the forthcoming SPD will inform the identification and delivery</u></b></p>

			<p><b><u>of opportunities for additional greenspaces, improvements to existing areas and visitor access and management measures. These will be set out in a Strategic Access Management and Monitoring (SAMM) Strategy to better manage access arrangements within the SAC/SPA, in conjunction with the provision of alternative recreational spaces, which will allow appropriate, feasible and publicly acceptable means of mitigating residual impacts to be identified.</u></b> An approach will be adopted that sets out a mechanism for the calculation of the planning contribution towards the most beneficial mix of the management and mitigation measures identified in the policy. Where funding needs to be pooled from a number of development proposals, consideration will be given to include such measures in the Regulation 123 List of the Community Infrastructure Levy Regulations.</p>
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## Section 4 Sub Area Policies

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification																								
			New text: <u>underlined</u> Deleted text <del>strike through</del>																								
MM38	Page 72	Policy BD1 Criterion A	<p>Amend text under criterion A, as follows:</p> <p>A. Strategic Pattern of Development</p> <p>In accordance with Policies H03 and EC3, the Regional City of Bradford (including Shipley and lower Baildon) will accommodate <del>28,650</del> <u>27,750</u> dwellings and <del>approximately</del> <u>at least</u> 100Ha of new employment land in the period up to 2030. The broad distribution of housing development is shown as follows:</p> <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th colspan="2">Number of residential units</th> </tr> </thead> <tbody> <tr> <td>Bradford City Centre</td> <td>3,500</td> <td></td> </tr> <tr> <td>Shipley &amp; Canal Road Corridor</td> <td><del>3,200</del></td> <td><u>3,100</u></td> </tr> <tr> <td>Shipley</td> <td><del>1,250</del></td> <td><u>750</u></td> </tr> <tr> <td>North East</td> <td><del>4,700</del></td> <td><u>4,400</u></td> </tr> <tr> <td>South East</td> <td>6,000</td> <td></td> </tr> <tr> <td>South West</td> <td>5,500</td> <td></td> </tr> <tr> <td>North West</td> <td>4,500</td> <td></td> </tr> </tbody> </table> <p>Affordable housing requirements are set out in Policy HO11.</p>		Number of residential units		Bradford City Centre	3,500		Shipley & Canal Road Corridor	<del>3,200</del>	<u>3,100</u>	Shipley	<del>1,250</del>	<u>750</u>	North East	<del>4,700</del>	<u>4,400</u>	South East	6,000		South West	5,500		North West	4,500	
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MM39	Page 72	Policy BD1 Criterion B (2)	Amend wording of Criterion B (2) as follows:  '2. The Shipley and Canal Road Corridor will see the creation of <del>3,200</del> <b><u>3,100</u></b> new homes by 2030. New homes will be provided in a range of locations in particular the centre section. As part of the Urban Eco Settlement ambitions the Corridor will deliver sustainable buildings with innovative and contemporary architecture, Bolton Woods wildlife area and a linear park and water features linking the town centre of Shipley to the City Centre of Bradford. This will all be supported by the creation of new cycleways and footways, and improvements to Frizinghall station and new road infrastructure including Canal Road Corridor Improvements and the Shipley Eastern Link Road. Opportunities to further improve public transport will be taken wherever possible.'
MM40	Page 73	Policy BD1 Criterion C (2)	Amend text under criterion C (2,) as follows:  2. North East Bradford, will see the creation of <del>4,700</del> <b><u>4,400</u></b> new homes with associated community facilities, in particular open space and recreation facilities. The new homes will be delivered by a mix of sites but will include some local green belt changes in sustainable locations. A new <b><u>high quality</u></b> employment opportunity <del>comprising a high quality including</del> research and development <del>led technology park</del> and commercial enterprise will be located at Apperley Bridge (complemented by a new railway station and improvements to the Harrogate Road / New Line Junction). Walking and cycling networks will be enhanced including the upgrading of the canal towpath between North Bradford and Leeds.
MM41	Page 73	Policy BD1 Criterion C (4)	Amend the first sentence as follows:  South West Bradford will see the creation of <del>up to</del> 5,500 new homes.
MM42	Page 73	Policy BD1 Part C	Add new criterion and number as C (5). with the text to be added as follows:  <b><u>5. Shipley will see the creation of 750 new homes by 2030 together</u></b>

			<b><u>with associated community facilities and new employment opportunities. The new homes will be delivered by a mix of sites but will include some local green belt changes in sustainable locations. The location and design of development will have regard to the requirement within Policy EN3 conserve those elements which contribute to the Outstanding Universal Value of Saltaire.</u></b>																
MM43	Page 74	Sub Area Policy BD1, Criterion E.5	Amend criterion as follows:  Conserve and enhance the <b>area's</b> designated and undesignated heritage assets, in particular those in <b>the</b> Bradford City Centre, <b>Little Germany, Goitside and the Registered Battlefield at Adwalton moor.</b>																
MM44	Page 82	Policy AD1 Criterion A	Amend text under criterion A, as follows:  A. Strategic Pattern of Development In accordance with Policies H03 and EC3, Airedale will accommodate <del>8,350</del> <b>8,450</b> dwellings in the period up to 2030 and an increase of new employment land of <b>at least</b> 30 Ha particularly in the digital technology sector. The broad distribution of housing development is shown as follows:-  <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="2" style="text-align: center;">Number of residential units</th> </tr> </thead> <tbody> <tr> <td>Keighley</td> <td style="text-align: right;">4,500</td> </tr> <tr> <td>Bingley</td> <td style="text-align: right;">1,400</td> </tr> <tr> <td>Silsden</td> <td style="text-align: right;"><del>1,000</del> <b>1,200</b></td> </tr> <tr> <td>Steeton with Eastburn</td> <td style="text-align: right;">700</td> </tr> <tr> <td>Baildon</td> <td style="text-align: right;"><del>450</del> <b>350</b></td> </tr> <tr> <td>Cottingley</td> <td style="text-align: right;">200</td> </tr> <tr> <td>East Morton</td> <td style="text-align: right;">100</td> </tr> </tbody> </table> Affordable housing requirements are set out in Policy HO11.	Number of residential units		Keighley	4,500	Bingley	1,400	Silsden	<del>1,000</del> <b>1,200</b>	Steeton with Eastburn	700	Baildon	<del>450</del> <b>350</b>	Cottingley	200	East Morton	100
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MM45	Page 82	Policy AD1 Criterion B	Amend text under criterion B, fourth paragraph, as follows:																

		Silsden	Silsden will see the creation of <del>1,000</del> <b>1,200</b> new homes with associated community facilities and the creation of Silsden Rural Business Park. Supporting highway infrastructure will be provided together with good walking and cycling links to Silsden and Steeton railway and bus interchange station.
MM46	Page 82	Policy AD1 Criterion B Cottingley & East Morton	Amend text under criterion B, final paragraph, as follows:  Cottingley and East Morton will see <b>a smaller scale of</b> housing development <del>to meet local need</del> including some local green belt changes in sustainable locations.
MM47	Page 83	Policy AD1 Criterion B Baildon	Amend text under criterion B, sixth paragraph, as follows:  Baildon will see the creation of <del>450</del> <b>350</b> new homes including from sites within the area together with some local green belt changes in sustainable locations and associated community facilities.
MM48	Page 83	Policy AD1 Criterion D (2)	Amend Criterion D (2) as follows:  Protect and enhance the integrity of the South Pennine Moors SPA/SAC and identify measures to support valuable upland fringe habitats. <del>and manage access to reduce the impact of increasing visitor number.</del> <b><u>For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence, and mitigate the impact of increasing visitor numbers.</u></b>
MM49	Page 84	Sub Area Policy AD1, Criterion (D 6)	Amend criterion D (6) as follows:  '6. Conserve and enhance the designated and undesignated heritage assets <b><u>of the Airedale Corridor</u></b> in particular those within the boundary of the Keighley Townscape Heritage Initiative and <b><u>elements which make a significant contribution to the distinct character of this area including: the mills, chimneys and associated housing of its textile heritage in particular</u></b> Saltaire World Heritage Site, <b><u>the buildings and</u></b>

			<b><u>structures associated with the Leeds and Liverpool Canal, and the prehistoric landscapes'</u></b>										
MM50	Page 88	Policy AD2	<p>Add additional criterion, as follows:</p> <p><b><u>'G. To work with Yorkshire Water and the Environment Agency to understand fully the water and waste water infrastructure requirements needed to support growth and ensure that development proposals are aligned with investment in asset management and catchment management plans .'</u></b></p>										
MM51	Page 90	Policy WD1 Criterion A	<p>Amend text under criterion A, as follows:</p> <p>A. Strategic Pattern of Development</p> <p>In accordance with Policies H03 and EC3, Wharfedale will accommodate <del>1,600</del> <b><u>2,500</u></b> dwellings and <del>approximately</del> <b><u>at least</u></b> 5 Ha of new employment land in the period up to 2030. The Council will work closely with partner organisations to ensure that this development is sensitively managed to create vibrant and sustainable communities.</p> <p>The broad distribution of housing development is shown as follows:</p> <table> <tr> <td></td> <td>Number of residential units</td> </tr> <tr> <td>Ilkley</td> <td><b><u>800-1,000</u></b></td> </tr> <tr> <td>Burley In Wharfedale</td> <td><b><u>200-700</u></b></td> </tr> <tr> <td>Menston</td> <td><b><u>400-600</u></b></td> </tr> <tr> <td>Addingham</td> <td>200</td> </tr> </table> <p>Affordable housing requirements are set out in Policy HO11</p> <p>Within the Principal Town of Ilkley, <b><u>the Local Growth Centres of Burley in Wharfedale and Menston</u></b> and the Local Service Centres of Addingham, <del>Burley in Wharfedale and Menston</del> there are opportunities for development through infill whilst retaining the character of these places.</p>		Number of residential units	Ilkley	<b><u>800-1,000</u></b>	Burley In Wharfedale	<b><u>200-700</u></b>	Menston	<b><u>400-600</u></b>	Addingham	200
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Menston	<b><u>400-600</u></b>												
Addingham	200												

MM52	Page 90	Policy WD1 Criterion B	<p>Amend text under criterion B, as follows:</p> <p>B. Development including new housing provision will be focused as follows:</p> <p>Ilkley will see the creation of <del>800</del> <b>1,000</b> new homes focused on urban redevelopment opportunities together with a significant contribution from green belt changes in sustainable locations. Provision will be made for associated community facilities, in particular new schools as required and provision of recreation and open space to address current deficiencies.</p> <p>Addingham will see the creation of 200 new homes <del>to meet local needs</del> and associated community facilities.</p> <p>Burley in Wharfedale will see creation of <del>200</del> <b>700</b> new homes <del>to meet local need</del> through redevelopment of sites within the settlement and <b><u>with a significant contribution from green belt changes, from some local green belt changes,</u></b> together with associated community facilities.</p> <p>Menston will see the creation of <del>400</del> <b>600</b> new homes based on existing permissions and other opportunities within the settlement boundary <b><u>and from some local green belt changes</u></b> together with associated community facilities.</p>
MM53	Page 91	Policy WD1 Criterion D (2)	<p>Add new Criterion D (3) as follows:</p> <p><b><u>D(3) For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence, and mitigate the impact of increasing visitor numbers.</u></b></p> <p>Consequential amendment to renumber the existing criterion D(3) as D(4) and D(4) as D(5), and D(5) as D(6).</p>
MM54	Page 91	Sub Area Policy WD1, Criterion	<p>Amend Criterion D (5) (now D6 – see above) as follows:</p>

		D.5	Conserve and enhance the designated and undesignated heritage assets <u>of the Wharfe Valley especially those elements which make a significant contribution to the distinct character of this area including the distinctive Victorian and Edwardian heritage of Ilkley and the prehistoric landscapes and rock art of Rombald's Moor.</u>																				
MM55	Page 94	Paragraph 4.3.4	<p>Amend paragraph 4.3.4, as follows:</p> <p>The village of Addingham, on the edge of the Yorkshire Dales National Park, has retained its character and sense of place whilst <u>seeing a smaller scale of housing development and provision of meeting local needs for affordable housing and</u> local facilities. The village has also benefited from good bus connections to the principal town of Ilkley, the town of Silsden and neighbouring Skipton.</p>																				
MM56	Page 96	Policy PN1 Criterion A	<p>Amend text under criterion A, as follows:</p> <p>A. Strategic Pattern of Development</p> <p>In accordance with Policy H03, the South Pennine Towns and Villages will accommodate <del>3,500</del> <u>3,400</u> dwellings in the period up to 2030. The Council will work closely with partner organisations to ensure that this development creates vibrant and sustainable communities. The broad distribution of housing development is shown as follows:</p> <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th style="text-align: right;">Number of residential units</th> </tr> </thead> <tbody> <tr> <td>Queensbury</td> <td style="text-align: right;">1,000</td> </tr> <tr> <td>Thornton</td> <td style="text-align: right;">700</td> </tr> <tr> <td>Cullingworth</td> <td style="text-align: right;">350</td> </tr> <tr> <td>Denholme</td> <td style="text-align: right;">350</td> </tr> <tr> <td>Harden</td> <td style="text-align: right;">100</td> </tr> <tr> <td>Haworth</td> <td style="text-align: right;"><del>500</del> <u>400</u></td> </tr> <tr> <td>Oakworth</td> <td style="text-align: right;">200</td> </tr> <tr> <td>Oxenhope</td> <td style="text-align: right;">100</td> </tr> <tr> <td>Wilsden</td> <td style="text-align: right;">200</td> </tr> </tbody> </table>		Number of residential units	Queensbury	1,000	Thornton	700	Cullingworth	350	Denholme	350	Harden	100	Haworth	<del>500</del> <u>400</u>	Oakworth	200	Oxenhope	100	Wilsden	200
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			Affordable housing requirements are set out in Policy HO11
MM57	Page 96	Policy PN1 Criterion B	Amend text under criterion B Third paragraph, as follows:  The Local Service Centres of Cullingworth, Denholme and Haworth will between them see the creation of <del>1200</del> <b>1100</b> new homes principally from sites within the existing settlement boundaries together with some local green belt changes. Provision will be made for associated community facilities in particular, health care facilities at Denholme, a community centre at Cullingworth and recreational facilities in Haworth.
MM58	Page 97	Policy PN1 Criterion E (2)	Amend criterion E and F to D and E respectively. Amend 'new' D (2) as follows:  Protect the ecological integrity, the wilderness appeal and wide open skylines of the South Pennine Moors from adverse impacts, <u>and</u> , enhance the value and connectivity of upland fringe habitats. <del>and seek to manage pressure from visitors and</del> <b><u>For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence, and mitigate the impact of increasing visitor numbers.</u></b>
MM59	Page 97	Sub Area Policy PN1, Criterion E (4)	Amend criterion E (4) ( proposed now D (4)), as follows:  <del>'Conserve and enhance the designated and undesignated heritage <b>assets in particular those in Haworth conservation area of the Pennine towns and villages especially those elements which make a significant contribution to the distinct character of this area including: the mills, chimneys and associated housing of its textile heritage; and the buildings and landscapes associated with the Brontes.</b></del>
MM60	Page 99	Paragraph 4.4.3	Amend text as follows:  <b>Haworth</b> continues to function as a widely recognised asset to the District with

			its Bronte Country heritage, the Bronte Parsonage Museum and the Keighley and Worth Valley Steam Railway. The traditional economy of the town has been diversified by providing accommodation for visitors, specialist shopping and dining experience as well as a popular location for film and television productions. <b>Housing development in Haworth has continued to cater for local demand.</b>
MM61	Page 99	Paragraph 4.4.5	Amend text as follows:  The Pennine Villages of Oakworth, Oxenhope, Harden, Wilsden, Cullingworth and Denholme have retained their individual characters and sense of place whilst <u>seeing a smaller scale of housing development and the provision of meeting local needs for housing and</u> amenities served by improved bus and rail links to Keighley town centre, Bradford city centre, Bingley, Queensbury and neighbouring Halifax.
MM62	Page 100	Policy PN2	The first paragraph of Policy PN2 is modified as follows:  To manage change in the Pennine Towns and Villages on a scale that meets <b>local</b> needs for housing, employment and renewal, enhances green infrastructure, heritage assets, community facilities and improves sustainable means of transport Partnership working between the public and private sectors, key stakeholder bodies and local communities should focus on:

## Section 5.1 Economy and Jobs

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text <del>strike through</del>
MM63	Page 105	Policy EC1 paragraph 5.1.4	<p><b><u>Amend paragraph 5.1.4. as follows:</u></b></p> <p><b>5.1.4</b> In supporting Strategic Core Policy 1, the overall approach and key spatial priorities, Policy EC1 will help transform economic conditions across the District and manage and spread the benefits of economic growth as part of the wider Leeds City Region. It will enhance the role of Bradford as an important business location, with the principal towns and growth centres as hubs for the local economy. It will also help encourage diversification of the rural economy. The Policy will help support the renewal and regeneration of urban and rural areas thus contributing to the aims of Strategic Core Policy 3 – Working Together to Make Great Places together with Strategic Core Policy 4 which determines the hierarchy of settlements and their role in the economic development of the District. <b><u>The principal areas for future economic growth will be located in the Airedale corridor, in Bradford City Centre and the principal towns, in the M606 corridor and in the North East and South East Bradford-Leeds interface. These Economic Growth Areas will provide a range of sites for new high quality employment opportunities and commercial enterprise.</u></b></p>
MM64	Page 106	Policy EC1 Criterion K	<p>Amend Criterion K, as follows:</p> <p>‘K. Opportunities for business relating to the Districts unique environmental assets and challenges, including <b><u>extraction industries</u></b>, sustainable construction, renewable energy, resource and waste efficiency and environmental technologies and the ‘low carbon economy’.’</p>

MM65	Page 110	Policy EC2	Amend introductory text in Policy EC2, as follows:  “The Council will support the delivery of at least <del>2897</del> <b>1600</b> new jobs annually in the District in the period to 2030 through.”
MM66	Page 110	Policy EC2 - Targets	Amend target in third column of table below policy EC2 as follows:  ‘Annual delivery of <del>2897</del> <b>1600</b> jobs’
MM67	Page 111	Policy EC2 paragraph 5.1.14	Amend paragraph 5.1.14, as follows:  ‘The 2011 Regional Econometric Model projection produced a forecast of 26,726 new jobs by the year 2028, an average of approximately 1572 jobs annually. Employment was anticipated to be driven by growth in the business, professional, finance, service and health sectors with manufacturing experiencing an overall decline. It has been calculated that this job growth equates to 146 hectares of employment land in the B Use Class across the District. However, the projections produced by the Employment Land Review and its update are based largely on trend based modelling of how the economy might perform in future years. In this respect they are not wholly complete assessments of jobs growth and related land requirement. Whilst the current economic trend indicates a growth of approximately <del>1352</del> <b>1600</b> jobs per annum (excluding retail and Wholesale – REM <del>March June 2013-2014</del> ), the <del>theoretical</del> <b>actual</b> need is <b>potentially</b> much greater. It is estimated that by 2030, a total of 55,298 (15.7%) of the working population will be claiming ‘Out of Work’ benefits. In order to attain full levels of employment in the District (providing jobs for everyone), the target number of jobs that would need to be created by 2030 is 4424 jobs per annum which is in reality, an unattainable aspiration. The strategy for a prosperous economy is to create the right conditions and opportunities for significant jobs growth across the District. It is not sustainable to accept the District’s high level of unemployment and economic inactivity and it is through policy EC2 an attempt is made to mitigate these circumstances. <del>Since the number of claimants obtaining Job Seekers Allowance is estimated to reach 21,464 by 2030 and in addition, the growth in the working age population in full employment will increase by 27.800, there is a</del>

			<del>requirement for an average of a further 2897 new jobs annually to provide for this demand.'</del>
MM68	Page 111	Policy EC2 Paragraph 5.1.15	<p>Insert new paragraph in support of Policy EC2 to follow existing paragraph 5.1.15 (and renumber subsequent paragraphs) as follows:</p> <p><b><u>The Employment Land Reviews incorporated an assessment of the deliverability and potential market demand of the employment land within the Council's employment land portfolio. This included remaining allocated employment sites from the Replacement Unitary Development Plan together with other sites which had planning backing such as an extant planning permission. The current employment land portfolio as determined at 1st April 2014 amounted to 116.03 hectares in total. This comprises of 106.68 hectares of land allocated in the Replacement Unitary Development Plan together with 9.35 hectares of land with other forms of planning backing such as planning permission. The assessment of this land indicates that, for the purposes of providing a new portfolio of employment land that will endure for the plan period and will secure opportunities for new investment and sustained economic growth, only 51.57 hectares are considered potentially suitable. Within the Bradford area, where the proposed allocation is at least 100 hectares, the current supply of potential good employment sites is 33.39 hectares, a shortfall 66.61. In Airedale, the supply is 18.18 hectares giving a shortfall of 11.82 hectares. There are no sites allocated in Wharfedale of reasonable market demand giving a requirement of 5 hectares. However, these figures will be re evaluated at Allocations stage when the details of all sites will be considered against a broad range of factors including competing demands for other land uses such as housing, infrastructure requirements, environmental impacts, and physical characteristics such as access.'</u></b></p>
MM69	Page 113	Policy EC3 Criterion A	<p>Amend criterion A, as follows:</p> <p>'A. The planned requirement for <b>at least</b> 135 hectares of employment land within the district will be distributed between the different parts of the <b>LDF District</b> as follows:</p>

			<ol style="list-style-type: none"> <li>1. 100 ha within City of Bradford</li> <li>2. 30 ha in the Airedale Corridor</li> <li>3. 5 ha in the Wharfedale corridor'</li> </ol>
MM70	Page 116	Paragraph 5.1.25 new text in support of Policy EC4 Criterion D	<p>Insert new paragraph to follow existing paragraph 5.1.25 in support of Policy EC4 Criterion 4, as follows:</p> <p><b><u>'5.1.27 Criterion D recognises that there are key locations within the main urban areas where existing industrial and business uses predominate. It is considered that these zones provide a range of sites of varying quality and rental supply which can be of particular advantage to the development of young or lower level economic enterprises. Such concentrations of employment activity can also provide the impetus for new business innovation and growth. The traditional employment activities of these areas will continue to play an important role in providing jobs for their surrounding communities.'</u></b></p>
MM71	Page 116	Policy EC4 Criterion D	<p>Amend Criterion D as follows:</p> <p><b><u>'D. Identifying Strategic Employment Zones within the Allocations DPD and Area Action Plan DPD's</u></b> where development proposals for non employment uses will not be permitted unless it can be demonstrated that the proposal relates to a use which supports the function of the function of the employment zone as a predominantly industrial area.'</p>

## Section 5.3 Housing

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text <del>strike through</del>
MM72	Pages 154 & 155	Policy HO1 Supporting text paragraphs 5.3.11 – 5.3.14	<p>Amend paragraphs 5.3.11 – 5.3.14 and add additional new paragraphs as follows:</p> <p><b><u>5.3.11 Determining the scale of provision for new housing to plan for within this Core Strategy has involved two key stages. Firstly</u></b> in line with the NPPF, the Council has sought to undertake an objective assessment of the future need for new housing using robust and up to date evidence. <b><u>It has then considered whether it is feasible and appropriate to plan for this level of housing growth bearing in mind such factors as deliverability, land supply, environmental impacts and the need for a green belt review.</u></b></p> <p><b><u>5.3.12</u></b> The level of new housing required is difficult to assess because it is dependent on a range of complex and interdependent variables all of which have to be projected forward over the period of the plan. The Council has therefore sought independent advice on the level at which the housing requirement should be set by the commissioning of a Housing Requirement Study. The results of the Housing Requirement Study have then been incorporated into the SHMA update. The study looks at:</p> <ul style="list-style-type: none"> <li>• Official Government projections of expected population and household growth in the district;</li> <li>• The sensitivity of population and household growth to variables such as levels of migration; <b><u>and</u></b></li> <li>• The influence of projected economic and jobs growth on the number of new homes needed; <b><u>and</u></b></li> <li>• <b><u>Housing market indicators and drivers.</u></b></li> </ul>
MM72 (Continued)			<p><del>5.3.13</del>The population and household projections formulated by the</p>

<p>MM72 (Continued)</p>			<p>Government and the Office For National Statistics are trend based and therefore highly sensitive to the trend period on which they are based. They are updated on a regular cyclical basis approximately every two years. The initial Housing Requirements Study <u>was</u> issued in February 2013 and <u>was</u> based on the then current 2008 based household projections. <u>It was then has recently been</u> supplemented by an addendum report which re-<u>ran runs</u> the modelling to incorporate the interim 2011 based household projections issued by the CLG in April 2013. <u>A further report was issued in September 2014. This update was commissioned as a result of work with neighbouring authorities within the Leeds City Region aimed at deriving a consistent approach to assessing housing need. The new work updated the core demographic and economic based scenarios of the earlier reports using recently released 2011 census data, updated jobs growth projections and the newly issued 2012 based population projections.</u></p> <p>5.3.13 <u>14</u> Full details of the Housing Requirements Study <u>and the different iterations of the work</u> are available on the Council's website. <u>In line with Government guidance, in each case the work generated a baseline demographic scenario. However one of</u> <del>but</del> the key conclusions of the work <u>is are</u> that the district is expected to see rapid and sustained population growth over the period and that the housing requirement should be aligned to a level of household growth consistent with the expected expansion in the district's economy as indicated by the Regional Econometric Model. <u>The result is an increase or uplift in the assessment of housing need to a level well above the basic demographic scenario.</u> <del>The rate of household formation which will occur within this growing population is more difficult to predict because it is more sensitive to changes in the economy and the housing market. The Addendum Report therefore recommended that the housing requirement be set at the mid point of a range of 1807 to 2565 dwellings per annum.</del></p> <p>5.3.15 <u>In line with the NPPG the Council has also taken account of a range of market signals in its objective assessment of housing need. It has reflected on the information and analysis contained</u></p>
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			<p><b><u>both within the Housing Requirement Study and the SHMA. The Government identifies a number potentially relevant market signals but in Bradford’s case the most significant are considered to be past rates of development and overcrowding. Past rates of development have been significantly below both planned supply and below the average rate of household growth over the period. Levels of overcrowding within parts of the urban areas are high and have worsened in recent years. The Council considers that this indicates a level of unmet need which it has addressed via the addition of a further uplift to the housing need assessment.</u></b></p> <p><b><u>5.3.16 Having determined its objective assessment of need the Council has given careful consideration to whether that need can and should be met within Bradford District. Having regard to evidence such as the SHLAA the Council considers that the level of need can be accommodated and delivered. It has also used a range of evidence including the Bradford Growth Assessment and the Sustainability Appraisal to consider the implications of planning for this level of growth. In particular it has given careful consideration to the need for and implications of green belt changes. It considers that the district’s housing needs can be met in full in a sustainable way and in accordance with the NPPF.’</u></b></p>
MM73	Page 157	Paragraph 5.3.14 & 5.3.15	<p>Re-number and amend paragraphs 5.3.14 and 5.3.15, as follows:</p> <p><b><u>5.3.14 17</u></b> As set out in Policy HO1 and Table HO1 there are a number of key variables which combine to produce the housing requirement for the district.</p> <p><b><u>5.3.15 18</u></b> The Housing Requirement Study’s base date is 2011 and <b><u>sets out its analysis of household growth and housing need up to 2030. The Core Strategy therefore indicates an the</u></b> estimated annual need <b><u>over from</u></b> that period <b><u>of is taken to be</u></b> 2200 dwellings in line with the report’s recommendations. <b><u>The NPPF requires that the Local Plan makes provision for a period of 15 years from the expected date of adoption of the plan. Since the expected date of adoption of the Core Strategy has slipped to early 2015 the Housing Requirement</u></b></p>

			<del>must cover the period to 2030 rather than 2028 as envisaged when the study was commissioned. The Council has therefore simply applied the study's findings for an additional 2 years.'</del>
MM74	Page 158	Paragraph 5.3.23	<p>Delete paragraph 5.3.23 and replace with a new paragraph as follows:</p> <p><del>The main sources of supply to meet the housing requirement as set out within Policy HO2, in addition to those houses already completed, are now explained in more detail.</del></p> <p><u>The housing requirement set out within Policy HO1 has already taken account of housing completions up to April 2013. In addition to any further completions after this date on sites with a capacity of 5 or more dwellings or above 0.2ha in size, the main sources of supply to meet the housing requirement are now explained in more detail.</u></p>
MM75	Page 166	Table HO3	<p>Baseline distribution of housing requirement relating to population:</p> <p>Within Table HO3 delete the following from the Local Service Centres section and then insert the same text within the Local Growth Centres section:</p> <p>"Burley In Wharfedale 518" "Menston 362"</p> <p>Amend the first line of the Local Growth Centres section of the table as flows:</p> <p>Local Growth Centres <del>2,196</del> <b><u>3,076</u></b></p> <p>Amend the first line of the Local service Centres section of the table as follows:</p> <p>Local Service Centres <del>4,850</del> <b><u>3,970</u></b></p>
MM76	Page 167	Paragraph 5.3.56	Reflecting earlier modifications paragraph 5.3.56 and re-number. Within the paragraph the third, fourth and fifth sentences are deleted and replaced with new text as follows:

			<p>The only exceptions are Bradford City Centre and the Shipley Canal Road Corridor. Within the City Centre the housing targets to an extent reflect permissions already granted together with further ongoing viability work to suggest the levels of new homes that could reasonably be accommodated in the 2 key regeneration areas. <del>With significant areas of the district effectively ruled out for accommodating significant additional development due to the impacts on the internationally important S Pennine Moors SAC / SPA, the only remaining alternative would be to allocate additional development to other parts of the regional city. With all urban in settlement land options utilised fully this would mean further increasing the take on green belt. The Council considers that this would be an inherently unsustainable approach when compared to the benefits of locating development within the city.</del></p> <p><u>The Council has also taken account of the balance in sustainability terms of locating development within the Regional City with its access to services, infrastructure and public transport compared to increasing further the levels of development in lower order settlements. The presence of environmental constraints such as possible impacts on the S Pennine Moors SAC / SPA has also been taken into account.</u> Moreover the accommodation of development within the Canal Road Corridor and the City Centre will have significant investment and regeneration benefits. The two relevant AAP's for these areas are already assessing in more detail how flood risk can be minimised or mitigated and will bring forward policies and proposals to this end. Overall it is therefore considered that the wider sustainability benefits of an approach which meets some of the housing need of the Regional City in these two areas significantly outweighs the flood risk issue.</p>
MM77	Page 168	Table HO4	<p>Within table HO4 amend the numbers and percentages as follows:</p> <p>The Regional City of Bradford  28,650 <b>27,750</b> 68.1% <b>65.9%</b> +326 <b>-574</b></p> <p>Shipley &amp; Canal Rd Corridor  3200 <b>3100</b> 7.6% <b>7.4%</b> +3085 <b>+2985</b></p> <p>Shipley</p>

			<p>1250 <b>750</b> 3.0% <b>1.8%</b> -235 <b>-735</b></p> <p>Bradford NE 4700 <b>4400</b> 11.2% <b>10.5%</b> -2736 <b>-3036</b></p>
MM78	Page 168	Paragraph 5.3.59	<p>Amend paragraph 5.3.59 as follows:</p> <p>Overall the proposed level of growth the Regional City <del>closely matches</del> <b>lies just below</b> the suggested baseline target and represents an increased concentration in this area as compared to that within the CSFED. This has been made possible by the updated and larger land supply within the area in the updated SHLAA and by the results of the <b>Growth Study Bradford Growth Assessment</b> which has identified additional potential areas of search for development around the city additional to those already contained within the SHLAA. <del>The HRA relating to the S Pennine Moors SPA / SAC has also necessitated a re-adjustment away from certain settlements and consequent increase in the Regional City.</del></p>
MM79	Page 168	Paragraph 5.3.60	<p>Amend paragraph 5.3.60 as follows:</p> <p>There are however significant differences between the different parts of the Regional City. <b>Shipley</b>, Bradford NE, SW and NW have all been assigned lower numbers than would be the case if the baseline targets were followed, largely due to land supply constraints in these areas.</p>
MM80	Page 169	Paragraph 5.3.61	<p>Amend paragraph 5.3.61 as follows:</p> <p>Conversely the Bradford SE figure lies well above the baseline target and this reflects the potential land supply in the area and the proposals for development both within and adjoining Holme Wood based upon the approved Neighbourhood Plan. It also reflects the results of the <b>Growth Study Bradford Growth Assessment</b> which recommended the SE area as a particular focus for growth.</p>
MM81	Page 169	Table HO5	<p>Within table HO5 amend the numbers and percentages as follows:</p>

			<p>The Principal Towns  6,700 <b>6,900</b> 15.9% <b>16.4%</b> -30 <b>+170</b></p> <p>Ilkley  800 <b>1000</b> 1.9% <b>2.4%</b> -394 <b>-194</b></p>
MM82	Page 169	Paragraph 5.3.62	<p>Amend paragraph 5.3.62 as follows:</p> <p>'The proposed overall target for the Principal Towns is also close to that indicated within the baseline distribution. However the housing target for Ilkley lies <b>well-slightly</b> below both the baseline target and the target proposed within the CSFED.'</p>
MM83	Page 170	Table HO6	<p>Amend the second line of the table as follows:</p> <p>Local Growth Centres  3400 <b>4900</b> 8.1% <b>11.6%</b> <b>+1204</b> <b>+1824</b></p> <p>Amend the entry for Silsden as follows:</p> <p>Silsden <b>700</b> <b>1200</b> 1.7% <b>2.9%</b> <b>+367</b> <b>+567</b></p> <p>Amend the entry for Thornton as follows:</p> <p><b>Thornton</b> <del>4000</del> <b>700</b> <b>2.4%</b> <b>1.7%</b></p> <p>Add the following to the table  <b>Burley In Wharfedale</b> <b>700</b> <b>1.7%</b> <b>+182</b>  <b>Menston</b> <b>600</b> <b>1.4%</b> <b>+238</b></p>
MM84	Page 170	Paragraph 5.2.63	<p>Amend the paragraph as follows:</p> <p>'The Local Growth Centres are all locations which have been promoted to the third tier of the settlement hierarchy by virtue of their <b>status as sustainable</b></p>

			<p><b><u>local centres and their</u></b> role, function and accessibility to <del>the</del> larger settlements <del>of such as</del> Bradford, <del>or</del> Keighley <b><u>or to Ilkley</u></b>. They have a role in taking some of the development which would otherwise be allocated to <del>either</del> the Regional City, <del>or</del> to Keighley <b><u>or to Ilkley</u></b>. <b><u>The proposed targets for the Local Growth Centres reflect a balance between recognising their potential to accommodate some growth, the contribution that development can make to meeting housing need but also the need to reflect a number of environmental constraints. These include landscape and topography in the case of Queensbury and potential direct and indirect impacts on the South Pennine Moors SPA / SAC, and the 2.5km buffer zone around it, in the case of Silsden, Burley In Wharfedale and Menston. In the case of Queensbury, Thornton, and Steeton with Eastburn they are also assisting with the redistribution of development away from the SPA 2.5 km buffer zone. The growth assigned to Silsden has been significantly reduced as compared to the CSFED again as a result of the need to direct development away from the 2.5km buffer zone which overlaps a number of potential development sites on the eastern side of the settlement. The target for Queensbury has also been reduced since the CSFED in this case in order to reduce the need for green belt and maintain its separation from other areas and to reduce impacts on landscape and topography.</u></b></p>
MM85	Pages 170 -171	Table HO7	<p>Amend the second line of the table as follows:</p> <p>Local Service Centres  <del>3350</del> <b><u>2550</u></b> <del>8.0%</del> <b><u>6.1%</u></b> <del>-1501</del> <b><u>-1419</u></b></p> <p>Delete the following from the table  <del><b>Burley In Wharfedale</b> 200 0.5% 318</del>  <del><b>Menston</b> 400 1.0% 138</del></p> <p>Amend the entries for Baildon and Haworth as follows:</p> <p>Baildon 450 <b><u>350</u></b> <del>1.1%</del> <b><u>0.8%</u></b> <del>-904</del> <b><u>-1001</u></b>  Haworth 500 <b><u>400</u></b> <del>1.2%</del> <b><u>1.0%</u></b> <del>17</del> <b><u>- 83</u></b></p>

MM86	Pages 171 to 172	Policy HO3	<p>The following modifications are made to Policy HO3:</p> <p>Policy HO3: Distribution of Housing Development</p> <p>A. In accordance with the vision and spatial principles set out in this Plan, the forthcoming Allocations, Bradford City Centre and Shipley &amp; Canal Road DPD's will allocate sufficient land to meet the residual housing requirement of <b>at least</b> 42,100 for the district between April 2013 and April 2030. This requirement will be apportioned as follows:</p> <p>3,500 (<del>8%</del> <b>8.3%</b> of the district total) within the Bradford City Centre Area AAP;  <del>3,200</del> <b>3,100</b> (<del>8%</del> <b>7.4%</b> of the district total) within the Shipley &amp; Canal Road Corridor AAP;  <del>35,400</del> <b>35,500</b> (<del>84%</del> <b>84.3%</b> of the district total) within the Allocations DPD.</p>																
MM87	Pages 171-172	Policy HO3	<p>The following modifications are made to Policy HO3:</p> <p>B. The Apportionments between the different settlements of the district will be as follows:</p> <p>The Regional City of Bradford (<del>28,650</del> <b>27,750</b>) Divided as follows:</p> <table data-bbox="875 911 1615 1043"> <tr> <td>Bradford City Centre</td> <td>3,500</td> <td>Bradford NE</td> <td><del>4,700</del> <b>4,400</b></td> </tr> <tr> <td>Canal Road</td> <td><del>3,200</del> <b>3,100</b></td> <td>Bradford SW</td> <td>5,500</td> </tr> <tr> <td>Shipley</td> <td><del>4,250</del> <b>750</b></td> <td>Bradford NW</td> <td>4,500</td> </tr> <tr> <td>Bradford SE</td> <td>6,000</td> <td></td> <td></td> </tr> </table>	Bradford City Centre	3,500	Bradford NE	<del>4,700</del> <b>4,400</b>	Canal Road	<del>3,200</del> <b>3,100</b>	Bradford SW	5,500	Shipley	<del>4,250</del> <b>750</b>	Bradford NW	4,500	Bradford SE	6,000		
Bradford City Centre	3,500	Bradford NE	<del>4,700</del> <b>4,400</b>																
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Shipley	<del>4,250</del> <b>750</b>	Bradford NW	4,500																
Bradford SE	6,000																		
MM88	Pages 171-172	Policy HO3	<p>The following modifications are made to Policy HO3:</p> <p>B. The Apportionments between the different settlements of the district will be as follows:</p> <p>The Principal Towns (<del>6,700</del> <b>6,900</b>) Divided as follows:</p> <table data-bbox="875 1353 1451 1385"> <tr> <td>Ilkley</td> <td><del>800</del> <b>1,000</b></td> <td>Bingley</td> <td>1,400</td> </tr> </table>	Ilkley	<del>800</del> <b>1,000</b>	Bingley	1,400												
Ilkley	<del>800</del> <b>1,000</b>	Bingley	1,400																

			<p>Keighley 4,500</p> <p>Local Growth Centres (<del>3,400</del> <b>4,900</b>) Divided as follows:</p> <p><b><u>Burley in Wharfedale 700</u></b>      <b><u>Menston 600</u></b>  Queensbury 1,000      Steeton with Eastburn 700  Silsden <del>1,000</del> <b>1,200</b>      Thornton 700</p> <p>Local Service Centres (<del>3,350</del> <b>2,550</b>) Divided as follows:</p> <p>Addingham 200      East Morton 100  Baildon <del>450</del> <b>350</b>      Harden 100  <del><b>Burley In Wharfedale 200</b></del>      Haworth <b>500</b> <b>400</b>  Cottingley 200      <b>Menston 400</b>  Cullingworth 350      Oakworth 200  Denholme 350      Oxenhope 100  Wilsden 200</p>
MM89	Page 173	Policy HO4	<p>Modifications are made to part B and C of the policy as follows:</p> <p>B. The plan period will be split into 2 phases with phase 1 covering the first 8 years and the second phase the final 7 years of the plan period to 2030. <b>The <u>Allocations</u></b> DPD's will therefore need to allocate sufficient land to meet 8/15 of <del>its their</del> housing requirement as specified in Policy HO3 within the first phase <b><u>and 7/15 of its housing requirement within the second phase.</u></b></p> <p>C. Detailed proposals for the allocation of sites within these phases and the trigger mechanisms for releasing land will be set out within the Allocations, <del><b>Bradford City Centre and Shipley &amp; Canal Road DPD's</b></del> but will be based on the following principles:</p>
MM90	Page 173	Policy HO4	<p>Criteria 7 of Policy HO4 is amended as follows:</p> <p>7. The need to ensure an even delivery pattern within smaller settlements and rural areas where sites are aimed at meeting local and affordable housing need over the whole period of the <b><u>LDF Local Plan.</u></b></p>

MM91	Page 173	Policy HO4	<p>Additional criteria D and E are inserted as follows:</p> <p><b><u>D. Consideration will be given to bringing forward large or complex sites within the first phase where this would aid delivery in full in the plan period or where it would help to secure required investment and infrastructure;</u></b></p> <p><b><u>E. The Council will maintain a five year supply (plus NPPF buffer) of deliverable housing sites through considering release of the subsequent phase of sites to help address any persistent shortfall.</u></b></p>
MM92	Page 173 - 174		<p>Paragraph 5.3.69 is amended as follows: To reflect the changes to Policy HO4, paragraphs 5.3.69 to 5.3.73 are amended and new text added as follows:</p> <p>5.3.69 The use of <del>a phasing policies policy within the 3-site allocating DPD's</del> will effectively mean that some sites are held back from being developed until the second half of the plan period. It is important therefore that both details of the phasing approach and the selection of sites for the phases, <del>as set out in the forthcoming Allocations DPD, Bradford City Centre and Shipley &amp; Canal Road AAP's</del> are designed to meet the housing delivery goals and targets of this document as well as those relating to co-ordinated infrastructure delivery and meeting previously developed land targets.</p> <p><b><u>5.3.70 The Council will ensure that Policy HO4 supports housing delivery and regeneration in a number of ways – by being selective in where the phasing policy will apply, by ensuring that that the range of criteria for the actual placement of sites within a phase are designed to be broad and supportive of maintaining housing delivery, and by emphasising the importance of maintaining a 5 year land supply of deliverable sites. It is important to stress therefore that the range of criteria for the actual placement of sites within a phase are designed to be broad and supportive of maintaining housing delivery.</u></b></p>

<p>MM92 (Continued)</p>			<p>5.3.71 <u>Policy HO4 will therefore apply to the assessment and allocation of sites within the Allocations DPD. However within the Shipley &amp; Canal Road Corridor and Bradford City Centre AAP's all housing allocations will be released at the start of the plan period. There are several reasons for this.</u></p> <ul style="list-style-type: none"> <li>• <u>Firstly this will ensure that a greater supply of sites is released in the early stages of the Local Plan period thereby enhancing delivery in the areas of the district where there is the most pressing need for new homes and for regeneration;</u></li> <li>• <u>Secondly it reflects the fact that the preparation of the AAP's is now at an advanced stage.</u></li> <li>• <u>In the case of the Shipley and Canal Road Corridor AAP the achievement of the proposed 3,100 homes is dependent on a small number of large and complex sites all of which have been assessed as potentially benefiting from the certainty that early release would provide.</u></li> <li>• <u>In the case of the City Centre AAP there is very little differentiation between sites with all being previously developed land and all being highly accessible to public transport services. The advanced nature of the work on the AAP has also given assurance that there are no significant infrastructure based reasons for a phased land release in this area. The Council also considers that in most cases these sites would have the potential to further establish and accelerate the emerging pattern of investment and regeneration in the City Centre that is now underway. The market within the City centre is changing at a rapid rate and it is considered important that the AAP takes a flexible approach which supports delivery on sites as and when proposals for development and investment arise.</u></li> </ul> <p>5.3.72 <u>As a result of allocation of 8/15 of the supply within phase 1 of the Allocations DPD and the allocation of all housing land within phase 1 within the two AAP's, the total land supply released at the start of the Local Plan period will amount to at least 25,533 units or 61% of supply.</u></p> <p>5.3.73 <u>With regards to the detail of the phasing policy,</u> the decision to identify two phases and to make the first phase of a longer period than</p>
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<p>MM92 (Continued)</p>			<p>the second has been taken to ensure flexibility within the land supply and support delivery. An eight year first phase will also ensure that the use of a phasing policy will not undermine the ongoing existence of a 5 year land supply of deliverable sites. <del>Based on the LDS programme and the expectation of achieving an adopted Core Strategy by February 2015 it is envisaged that the first phase will run from February 2015 to February 2023.</del></p> <p>5.3.74 Within strategic planning sub areas, careful consideration will need to be given to assigning within each phase a variety of site types and site locations to meet the needs for different types, sizes and tenures of housing and this will mean that although there will be a focus on brownfield sites, <del>some</del> greenfield sites will need to be assigned to the first part of the plan period. The results of the SHLAA will also be used to ensure the potential timing of delivery on sites is also taken into account. The Local Infrastructure Plan will also be a key input into the phasing process. To be clear, although the Council wishes to encourage the take up and delivery of previously developed land, there will be no bar on a particular type of site being placed within the first phase.</p> <p>5.3.75 While <del>each of the 3 DPD's which will be allocating housing sites</del> <u>the Allocations DPD as a whole</u> will need to allocate sufficient land in the first phase to meet 8/15 of its plan wide housing requirement, it will not be a requirement <u>for each settlement to release land to precisely the same proportions. In some settlements more than 8/15 may be released within the first phase and in some slightly less. This reflects the varying circumstances</u> <del>to phase sites</del> on a settlement by settlement basis and the fact that <del>–This would not be practical since</del> some settlements will face more significant infrastructure issues while immediately deliverable land supply will also vary. <u>However unless there are sound planning reasons not to do so all settlement and sub areas should make a contribution to and release some land within phase 1.</u></p>
<p>MM92 (Continued)</p>			<p>5.3.76 <u>The Council recognises that in some cases there will be relatively long lead in times and technical issues associated with bringing forward larger or more complex sites for residential development.</u></p>

			<p><b><u>In such cases early release and phasing may assist infrastructure planning and the securing of funding, and will also ensure that such larger sites are capable of delivering their completions in full within the plan period. Consideration will be given to opportunities to bring such sites forward for development, as part of the first phase, where this is appropriate and consistent with the overall strategy.</u></b></p> <p>5.3.77 The overall principles for the phasing approach within the Local Plan are therefore set out in this document within Policy HO4. The Housing Implementation Framework included in Appendix 6 also sets out how the Council will monitor delivery and this includes the implications of under achievement of on housing completions and brownfield development targets for the phasing approach. <b><u>The Council will also consider the early release of phase 2 sites in the unlikely event of a persistent shortfall (defined as being over 2 successive monitoring year periods) in 5 year land supply.</u></b> Appendix 6 also includes the expected housing delivery trajectory. This in turn reflects the Council’s approach to maintaining a 5 year land supply which includes allowing for a 20% buffer in additional supply brought forward from the later part of the plan period and resolving the backlog in previous provision over the full plan period (the ‘Liverpool approach’). This reflects the need to boost delivery to meet the backlog but at a rate which would be practicable and deliverable.</p> <p>5.3.78 <b><u>Finally, to be clear, Policy HO4 is aimed at the process of allocating and phasing the release of sites in a managed and sustainable way in the subsequent Allocations DPD. It is not the intention that Policy HO4 be applied to prevent other future sustainable housing development proposals (which would be considered windfall development) from coming forward.</u></b></p>
MM93	Page 175	Policy HO5 Paragraph 5.3.77	<p>Amend paragraph 5.3.77 as follows:</p> <p>The Government’s NPPF therefore recognises that it is a legitimate role of the local plan to set density targets which reflect local circumstances. The local</p>

			<p>circumstances which warrant such targets in this plan include the massive scale of development which is needed to meet the district's growing population and the relatively constrained supply of deliverable land to meet that need, particularly within the main urban areas.</p> <p>In this context and in having regard to the need to promote urban regeneration and avoid the dispersal of development and increased journeys by car, the Council considers that <b>all most</b> developments should achieve a minimum density of 30 dwellings per hectare.</p>
MM94	Page 175	Policy HO5	<p>Make the following minor amendment to criteria C</p> <p>C. Detailed density targets applying to specific sub areas will be set out within the Allocations, Bradford City Centre and Shipley &amp; Canal Road <b>Corridor</b> DPD's. This will include those areas where local character of the area would warrant lower densities or areas well served by public transport where higher densities may be required.</p>
MM95	Page 177	Paragraph 5.3.81	<p>After paragraph 5.3.81 add a new paragraph as follows:</p> <p><b><u>For the purposes of clarity, the targets set out within Policy HO5 relate to net densities. Net density is usually determined by measuring the number of dwellings against the net developable area of the site. The net developable area would include only those site areas which will be developed for housing and directly associated uses, including local access roads within the site, private garden space, car parking areas, incidental open space and children's play areas, where these are provided.</u></b></p>
MM96	178	Policy HO6	<p>Amend Policy HO6 as follows:</p> <p>'A. In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, the plans, programmes and strategies of the Council will give priority to the development of previously developed land and buildings.</p>

			<p>This will mean achieving the maximum possible overall proportion of housing development on previously developed land consistent with:</p> <ol style="list-style-type: none"> <li>1. the deliverable and developable land supply;</li> <li>2. the need to maintain a 5 year land supply of deliverable sites;</li> <li>3. the need to coordinate development with infrastructure provision; and</li> <li>4. the need to maintain delivery of the scale and type of homes required throughout the plan period;</li> </ol> <p>B. District wide, <del>a minimum of</del> 50% of total new housing development over the Local Plan period will be on previously developed land.</p> <p>C. In order to achieve the district wide target of 50%, the Allocations, Bradford City Centre and Shipley and Canal Road DPD's should bring forward land and manage its release so as to deliver <del>at least</del> the following proportions of housing development on previously developed land:</p> <ul style="list-style-type: none"> <li>• In the Regional City of Bradford <del>a minimum of</del> 55%</li> <li>• In the Principal Towns <del>a minimum of</del> 50%</li> <li>• In the Local Growth Centres <del>a minimum of</del> 15%</li> <li>• In the Local Service Centres <del>a minimum of</del> 35%</li> </ul> <p>D. The Council will monitor performance against these targets and will take action if performance slips outside of the defined acceptable ranges as set out in the housing implementation framework.'</p>
MM97	Page 177	Paragraph 5.3.84	<p>Amend paragraph 5.3.84 , as follows:</p> <p>'Policy HO6, together with the implementation strategy included in Appendix 6 therefore sets out the priority that the Council will give to maximising the contribution which previously developed land makes to the provision of new homes, and indicates <del>minimum</del> targets for the proportion of housing completions which should be on previously developed land which reflects the evidence base, in particular the SHLAA. The policy therefore supports both the Core Strategy's place specific vision for Bradford and strategic objective 2.'</p>
MM98	Page 179	Paragraph 5.3.88	<p>Amend paragraph 5.3.88, as follows:</p>

			<p>' The district wide target of 50% of new housing on brownfield land is a realistic one based on the land supply data within the SHLAA. The targets <b><u>though challenging are considered achievable. have also been expressed as minima as the Council believes that there may be limited scope to further increase the proportion of brownfield delivery. For example</u></b> The SHLAA has taken a cautious view of development potential within the City Centre and there are a range of schemes not currently within the trajectory which may well come forward once the economy recovers albeit at lower densities than was the case when permissions were originally granted. Further brownfield supply may also materialise via the recycling of land in the urban areas, particularly within the Bradford and Keighley, and as a result of recent Government changes to allow the conversion of offices to residential use.'</p>
MM99	Page 186	Policy HO8 Paragraph 5.3.116.	<p>Amend paragraph 5.3.116. as follows:</p> <p>'When an appropriate mix of housing on site is being negotiated, decisions should take account of local market demand, the balance between general market supply and demand and evidence of local need to ensure the site contributes to the overall mix of housing in the locality. <b><u>The viability of achieving an appropriate housing mix should also be considered.</u></b> The SHMA, and any more detailed and localised evidence of housing need and demand, such as local or village needs surveys, will form the main basis on which the creation of an appropriate and sustainable mix of house types within larger sites will be judged both at the level of plan making and in considering planning applications.'</p>
MM100  MM100 (Continued)	Page 189	Policy HO9	<p>Amend Policy HO9 as follows:</p> <p>'A. New housing development should be high quality and achieve good design.</p> <p>B. The Council will encourage <b><u>and support all-new housing residential</u></b> developments to <del>meet</del> <b><u>achieve the highest possible</u></b> sustainable design and construction standards. <del>Subject to feasibility and / or viability,</del> The minimum acceptable <b><u>sustainable housing</u></b> standards <b><u>are set out in the building regulations with reference to the Code For Sustainable Homes or any national equivalent will be:</u></b></p>

			<ul style="list-style-type: none"> <li>• <del>Code Level 4 from the date of adoption, and</del></li> <li>• <del>Zero Carbon Housing (or any national equivalent) from 1st April 2016</del></li> </ul> <p>C. <u>Larger housing sites should include a proportion of</u> new homes <u>which are should be</u> designed to be accessible and easily adaptable to support the changing needs of families and individuals over their lifetime, including <u>older people</u> and people with disabilities.</p> <p>D. New development should provide private outdoor space for homes, unless site constraints make this clearly unfeasible and/or unviable.</p> <p>E. New homes should be well laid out internally and should provide suitable space standards appropriate to the type of home. Rooms should receive adequate levels of daylight.</p> <p>F. New development should provide adequate storage for bins, recycling and cycles. These should be located or designed in a way which is both convenient for residents and supports the quality of the street scene.</p> <p>G. Specific guidance on housing quality and design on an area or site basis will be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley &amp; Canal Road AAPs and Neighbourhood Plans. Higher standards of sustainable design and construction may be required for certain sites or areas where it is feasible and viable to do so.'</p>
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MM101	Page 190	Policy HO9	<p>Amend targets table in support of policy HO9, as follows:</p> <table border="1" data-bbox="882 188 1608 1190"> <thead> <tr> <th data-bbox="882 188 1131 233">OUTCOMES</th> <th data-bbox="1131 188 1417 233">INDICATORS</th> <th data-bbox="1417 188 1608 233">TARGETS</th> </tr> </thead> <tbody> <tr> <td data-bbox="882 233 1131 676"> <p>Housing that is high quality and achieves good design</p> <p>Housing that meets high standards of environmental performance as set out by Government</p> </td> <td data-bbox="1131 233 1417 676"> <p>% of major housing schemes achieving no reds in Building for Life 12 Assessments IND23(EV)</p> <p><del>% of new dwellings achieving Code Level 4</del> <b>Operational</b></p> </td> <td data-bbox="1417 233 1608 676"> <p>No planning permissions for a major housing scheme should achieve a 'red' rating against Building for Life 12 assessment</p> </td> </tr> <tr> <td data-bbox="882 676 1131 1120"> <p>Housing that is accessible and easily adaptable which caters for the needs of the district's growing population</p> </td> <td data-bbox="1131 676 1417 1120"> <p>% of new dwellings achieving <del>Lifetime Homes Standard or any national equivalent</del> <u>optional technical standards for accessible and adaptable dwellings and wheelchair user dwellings</u> Operational</p> </td> <td data-bbox="1417 676 1608 1120"></td> </tr> <tr> <td data-bbox="882 1120 1131 1190"></td> <td data-bbox="1131 1120 1417 1190"></td> <td data-bbox="1417 1120 1608 1190"></td> </tr> </tbody> </table>	OUTCOMES	INDICATORS	TARGETS	<p>Housing that is high quality and achieves good design</p> <p>Housing that meets high standards of environmental performance as set out by Government</p>	<p>% of major housing schemes achieving no reds in Building for Life 12 Assessments IND23(EV)</p> <p><del>% of new dwellings achieving Code Level 4</del> <b>Operational</b></p>	<p>No planning permissions for a major housing scheme should achieve a 'red' rating against Building for Life 12 assessment</p>	<p>Housing that is accessible and easily adaptable which caters for the needs of the district's growing population</p>	<p>% of new dwellings achieving <del>Lifetime Homes Standard or any national equivalent</del> <u>optional technical standards for accessible and adaptable dwellings and wheelchair user dwellings</u> Operational</p>				
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MM102	Page 191	Paragraph 5.3.138	<p>Amend paragraph 5.3.138 as follows:</p> <p>'Under Criterion B the council will encourage developers to bring forward proposals which meet <del>the highest possible</del> standards of sustainable <u>design and</u> construction, <u>which should meet at least</u> <del>All new development should</del></p>												

			<p><del>attain a high standard of sustainable construction in line with the prescribed national standards at the time of application. <b><u>New housing should achieve the zero carbon housing standard (or any national equivalent) in line with the timescales set out in the national zero carbon housing policy.</u></b> The council will encourage and support developments which exceed the national minimum standards. All new housing developments of 10 or more dwellings will be expected to meet the Code for Sustainable Homes Level 4, and from 1st April 2016 all new housing must meet the Zero Carbon Homes standard or any national equivalent. If the proposed standards are below those set out in Policy HO9 then the onus will be on applicant to justify why development to these standards cannot be achieved.</del></p>
MM103	Page 191	Paragraph 5.3.139	<p>Amend paragraph 5.3.139 as follows:</p> <p><del>‘This requirement will be assessed through evidence provided by the applicant that the scheme will achieve the standards set out in the policy (or any subsequent revised national standards). The evidence submitted by the applicant should enable easy assessment and applicants are encouraged to undertake a Design Stage Assessment of performance against the Code for Sustainable Homes. A post construction stage certificate confirming that the development has met the required standard will be required prior to occupation. The council will encourage and support developments which exceed the national minimum sustainable housing standards, particularly efficiency standards. The council will also support the use of on site renewable or low carbon energy generation, where appropriate and feasible, to help meet the energy requirements of the development and reduce carbon emissions.’</del></p>
MM104	Page 191	Paragraph 5.3.140	<p>Amend paragraph 5.3.140 as follows:</p> <p><del>‘<b><u>Under Criterion C The council will encourage and support</u></b> all new homes <b><u>should be which are designed to provide enhanced accessibility or adaptability designed to be accessible and easily adaptable. This includes accessible and adaptable dwellings and wheelchair user dwellings, as set out in the national optional technical standards for</u></b></del></p>

			<del>housing. Where feasible and viable the council will encourage new housing to achieve</del> <b>In addition the council will support the Lifetime Homes Standard <u>as a model for building accessible and adaptable homes.</u></b>
MM105	Page 191	Paragraphs 5.3.141. & 5.3.142	<p>Amend paragraph 5.3.141 as follows:</p> <p><del>‘ Under Criteria C larger sites of 10 dwellings or more will be expected to</del> <b><u>should</u></b> include a proportion of accessible homes as part of the overall housing mix. This will be assessed through evidence provided by the applicant that <b><u>a proportion of new homes on a site housing will achieves Lifetime Homes standards, the British Standards for Accessible Housing or any subsequent revised exceed the</u></b> national <b><u>minimum requirement for access.</u></b> <del>accessible housing standard.</del> If these standards are not met, this should be clearly justified and the applicant should demonstrate how the development meets the requirements of Criterion C. <b><u>In considering Criteria C regard will be had to local need and the viability and feasibility of delivering accessible homes on a particular site. Site specific factors such as vulnerability to flooding, the topography of the site or other circumstances which may make a site less suitable for accessible dwellings will also be taken into account, particularly where step free access cannot be achieved or is not viable.</u></b></p> <p>Insert new paragraph to follow:</p> <p><b><u>The council intends to undertake further detailed work in regards to the requirement for accessible, adaptable and wheelchair user dwellings in accordance with the latest National Planning Practice Guidance. The Housing Design Guide will take account of this work and provide further guidance in relation to the proportion of accessible, adaptable and wheelchair user dwellings required in advance of any adopted policy in the Local Plan.</u></b></p>
MM106	191	Paragraph 5.3.143	<p>Before paragraph 5.3.143 insert new paragraph as follows:</p> <p><b><u>5.3.144. The provision of sufficient living space within new homes is an important element of good housing design. Building to suitable space</u></b></p>

			<p><b><u>standards will ensure new homes provide sufficient space for everyday activities. Homes can also be used more flexibly and adapted more easily by their occupants to changing life circumstances.</u></b></p> <p>Amend paragraph 5.3.143, as follows:</p> <p><b><u>'Under Criterion E new homes should provide suitable space standards encourages suitable space standards which will ensure new homes provide sufficient space for everyday activities. Homes can also be used more flexibly and adapted more easily by their occupants to changing life circumstances. Subject to viability and /or feasibility the council will expect all new housing to meet at least the following minimum internal floor areas (or any subsequent national space standards) as follows:</u></b></p> <p><b><u>1 Bed / 2 person dwellings 51 m2</u></b>  <b><u>n 2 Bed / 3 person dwellings 66m2</u></b>  <b><u>n 2 Bed / 4 person dwellings 77 m2</u></b>  <b><u>n 3 Bed / 5 person dwellings 93 m2</u></b>  <b><u>n 4 Bed / 6 person dwellings 106 m2</u></b>  <b><u>(Floor areas shall be measured in line with RICS Gross Internal Floor Area)</u></b></p>
MM107	192	Paragraphs 5.3.144	<p>Insert new paragraphs after paragraph 5.3.143, as follows:</p> <p><b><u>' The Government has developed a national space standard to offer a consistent set of requirements with regard to the size of new homes. The overall objective of this national space standard is to ensure that new homes are highly functional in terms of meeting typical day to day needs at a given level of occupation. The standard is intended to be a minimum standard which developers should exceed where possible.</u></b></p> <p><b><u>For residential developments the council will apply the national space standard as a benchmark for assessing the suitability of the proposed space standards of new homes. This will allow particularly small homes to be identified, and where necessary, the council will seek to understand the reasons for any significant variation from the national space standard.</u></b></p>

			<p><b><u>Where feasible and / or viable new homes should meet at least the minimum internal floor areas as set out in the Nationally Described Space Standard (or any subsequent national space standards) ‘</u></b></p> <p>Amend Paragraph 5.3.144 as follows:</p> <p>‘If the proposed space standards are below those set out <b><u>in the nationally described space standard</u></b> <del>above</del> then the onus will be on applicant to justify why development to these standards cannot be achieved.’</p> <p>Insert new paragraph to follow:</p> <p><b><u>‘The council intend to undertake further detailed work in regards to adopting the national space standard in the District, in accordance with the latest National Planning Practice Guidance, in advance of any policy requirement in the Local Plan.’</u></b></p>
MM108	Pages 196 to 197	Policy HO11	<p>Amend criterion C under Policy HO11 as follows:</p> <p>‘C. Affordable housing will be required on <del>sites-developments</del> of 15 <del>dwelling units</del> <b><u>or more and on sites over 0.4 hectares in size</u></b>. The site size threshold is lowered to <b><u>11 5 dwellings units or more</u></b> in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden, and Cottingley.</p>
MM109	Page 198	Paragraphs 5.3.173 & 5.3.174	<p>Amend paragraph 5.3.173 as follows:</p> <p>The council will seek affordable housing from residential developments in accordance with the stated thresholds and percentages as set out in Policy HO11. Figure HO2 shows the areas that the policy and the thresholds will apply to. This equates the following quotas:</p> <ul style="list-style-type: none"> <li>• Wharfedale up to 30%</li> <li>• Towns, suburbs and villages up to 20%</li> <li>• Inner Bradford and Keighley up to 15%</li> </ul>

			<p><b><u>Within Wharfedale and the villages listed in Part C of Policy HO11 affordable housing contributions will be required on developments of 11 units or more or which have a maximum combined gross floorspace of more than 1000sqm, in accordance with the minimum threshold for affordable housing contributions as set out in the National Planning Practice Guidance.</u></b></p> <p>Amend paragraph 5.3.174 as follows:</p> <p>5.3.174. <del>Irrespective of the thresholds</del>, Policy HO11 will be applied to developments which have been manipulated in size (either in area or yield) in an attempt to avoid the provision of affordable housing, or which constitute piecemeal development. On smaller sites a commuted sum may be appropriate where this is justified by viability issues.</p>
MM110	Pages 200-202	Paragraphs 5.3.179 to 5.3.189	<p>Amend paragraphs 5.3.179 to 5.3.189 as follows:</p> <p><b>Gypsies, Travellers and Travelling Showpeople</b></p> <p>5.3.179 It is clearly established within the <del>recently issued national</del> Government guidance <b><u>contained within ‘Planning policy for traveller sites’</u></b> that the planning system has a crucial role and responsibility to ensure that adequate provision is made for the accommodation needs of travellers. Local planning authorities are required to set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area.</p> <p>5.3.180 The Core Strategy therefore assesses both current supply and future need for accommodation by reference to the <b><u>recently completed Gypsy and Traveller Accommodation Assessment of July 2015</u></b>, <del>2008 West Yorkshire Gypsy and Traveller Accommodation Assessment</del> and provides a framework to ensure that the sites which will be identified in forthcoming DPD’s meet <b><u>in full</u></b> the needs of the community and are in locations which are accessible to key services and facilities such as education thereby enhancing their quality of life.</p>
MM110 (Continued)			

<p>MM110 (Continued)</p>			<p><del>5.3.181 The Council are currently in the process of commissioning an update to the Accommodation Assessment for Bradford and its conclusions where relevant will be used to update Policy HO12 below.</del></p> <p><del>5.3.181</del> <del>5.3.182</del> The <u>Bradford Gypsy and Traveller Accommodation Assessment</u>, <del>West Yorkshire Accommodation Assessment</del>, <del>commissioned by the West Yorkshire Housing Partnership</del>, was completed by <u>consultants arc4</u>, has utilised a variety of <u>CRESR (the Centre for Regional Economic and Social Research at Sheffield University)</u> in <u>May 2008</u>. <del>The study is compliant with Government guidance on such studies and used both</del> <u>primary and secondary data and research to assess the scale and type of need including current unmet need, need from households who currently reside in bricks and mortar accommodation, and need resulting from future household growth which is linked to the age structure of current households and finally need for transit accommodation.</u></p> <p><del>5.3.182</del> <u>Based on the results of the Assessment it appears that there will be a need for a range of site types, tenures and locations including both private and public / social provided accommodation. The Council will therefore work closely with local communities in developing the site allocating elements of the Local Plan to ensure that sites and locations are both sustainable and best meet the needs of travellers and showpersons.</u></p> <p><del>5.3.183</del> <u>Government policy states that Local Planning Authorities should assess the need for transit site accommodation in addition to permanent accommodation. Such provision can support the community's lifestyle by providing temporary places to stop while travelling. Utilising data from past patterns of unauthorised encampments and information from stakeholder and household survey returns, the Gypsy and Traveller Accommodation Assessment has identified the need for 7 transit pitches with total capacity for 14 vehicles / homes. There are a number of models and options for providing for such transit need including that of Negotiated Stopping which is currently used in other parts of the region such as Leeds. The Council will work with local communities and neighbouring authorities to determine the best model and best locations</u></p>
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<p>MM110 (Continued)</p>			<p><u>for transit provision.</u></p> <p><del>5.3.183 The study found that there was already a level of unmet need for accommodation across the sub region with consequent detrimental effects on access to key services. For example, just 41 per cent of Traveller children on the roadside attend school regularly compared to 80 per cent of those on sites and in bricks and mortar housing. While the size of the population has increased the level of authorised provision has not kept pace with this change. This has resulted in a myriad of responses – including rising unauthorised encampments, ‘doubling up’ on sites, forced movements into bricks and mortar housing and overcrowding within trailers and caravans. New provision is therefore essential to address the backlog of unmet need and also meet the needs of new forming households and an expanding population.</del></p> <p><del>5.3.184 Specifically regarding gypsy and traveller accommodation West Yorkshire has a much higher proportion of socially rented provision (81 per cent) compared to the regional (53 per cent) and national (40 per cent) pictures and contains only a small proportion of private provision (4%).</del></p> <p><del>5.3.185 By contrast Travelling Showpeople do not tend to reside on local authority sites. Indeed, virtually all of those households in the survey were resident on Showmen’s yards leased to, or owned by, the Showmen’s Guild or Guild members. Travelling Showpeople also differ from other travelling groups in the sense that their accommodation needs are heavily influenced by their employment practices. They need larger spaces for the storage of heavy machinery and equipment and often need to carry out testing, repairs and maintenance to equipment within their yards.</del></p> <p><del>5.3.186 The Assessment found that there was already an acute shortage of accommodation for the travelling showpeople community and stated that the accommodation that did exist was generally of poor quality.</del></p> <p><del>5.3.187 In addition to specifying the number of pitches which are required the Assessment also makes a number of important points which are relevant to the type of provision and mechanisms for delivery within the District. Firstly based on need generated by patterns of unauthorised</del></p>
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MM110  
(Continued)

~~encampments the study concludes that there is a sub regional requirement for 19 transit pitches. However there was a lack of support towards the idea of transit sites from both stakeholders and the community with concerns related to the management of such sites. The study suggests that a pragmatic approach to accommodating transient households appears more appropriate. This could include short-term pitches on residential sites, the use of appropriate stopping places and short-term ‘doubling up’ on the pitch of a relative.~~

~~5.3.188 Secondly with regards to the ability of communities to make their own provision for sites and facilities there were differing results. Around 45% of Travelling Showpeople who responded to the study questionnaire had some experience of purchasing or pooling land compared to only 6% for other communities. The report suggests that levels of deprivation are higher among gypsy and Irish traveller groups – for these groups the purchase of land is simply not an option. The clear implication is that the local authority and other social housing providers will need to provide or facilitate the majority of accommodation needed for the gypsy and traveller community.~~

~~5.3.184 5.3.189~~ Table HO8 sets out the requirement for accommodation in the district based on the results of the study Assessment. ~~The study compares current and planned supply with current unmet need and future need which will result from the growth in households. Similar methodologies were used for assessing the needs of both Travelling Showpeople and Gypsies and Travellers. As the study only covered the period to 2026 Policy HO12 adds further pitches on a pro rata basis equivalent to the 2016-26 rates of the study.~~

Table HO8: Pitch and Plot Requirements In Bradford District based on the Bradford Gypsy & Traveller West Yorkshire Accommodation Assessment 2015 2008

Delete existing table HO8 and replace with the following table:

<u>Gypsy’s and Travellers</u>	<u>Need (2014-19)</u>	<u>82 Pitches</u>
	<u>Supply of</u>	<u>52 pitches</u>

MM110 (Continued)				<b><u>authorised pitches</u></b>	
				<b><u>Shortfall / additional supply needed 2014-19</u></b>	<b><u>30 pitches</u></b>
				<b><u>Longer Term Need (to 2030)</u></b>	<b><u>9 Pitches</u></b>
				<b><u>Total Additional Supply Needed</u></b>	<b><u>39 pitches</u></b>
			<b><u>Transit Provision</u></b>	<b><u>Total Additional Supply Needed</u></b>	<b><u>7 pitches</u></b>
			<b><u>Showpersons</u></b>	<b><u>Need (2014-19)</u></b>	<b><u>68 plots</u></b>
				<b><u>Supply of authorised plots</u></b>	<b><u>36 plots</u></b>
				<b><u>Shortfall / additional supply needed 2014-19</u></b>	<b><u>32 plots</u></b>
				<b><u>Longer Term Need (to 2030)</u></b>	<b><u>13 plots</u></b>
				<b><u>Total Additional Supply Needed</u></b>	<b><u>45 plots</u></b>
MM111	Pages 202-203	Policy HO12	<p>Amend Policy HO12 as follows:</p> <p>Policy HO12: Sites For Travellers and Travelling Showpeople</p> <p>A. The Council will make provision via policies and site allocations to deliver <b><u>at least</u></b> the following number of additional pitches for Gypsies and Travellers <b><u>and plots</u></b> for Travelling Showpeople for the period <b><u>to 2030</u></b> <del>2008-30</del>:</p> <ul style="list-style-type: none"> <li>• <b><u>39</u></b> <del>74</del> pitches for the gypsy and traveller communities; and</li> <li>• <b><u>7 pitches for transit accommodation</u></b></li> <li>• <b><u>45</u></b> <del>22</del> pitches for travelling showpeople</li> </ul> <p>B. The Allocations DPD and Shipley &amp; Canal Road AAP will <b><u>in combination</u></b></p>		

			<p><b>allocate identify</b> sufficient sites to deliver this requirement in sustainable and accessible locations which meet the needs of local communities;</p> <p><b><u>C. The Council will work closely and constructively with the neighbouring councils, the traveller and showperson’s communities and the settled community to identify the most appropriate sites which will offer locations and accommodation which are both sustainable and meet the needs of the travellers and showpeople;</u></b></p> <p><b><u>D</u></b> <del>C</del>. All sites which are developed or proposed for allocation for the gypsy and traveller and travelling showpeople communities should be assessed against criteria relating to:</p> <ul style="list-style-type: none"> <li>• Safe and appropriate access to the highway network;</li> <li>• Whether they are or can be served by utilities or infrastructure;</li> <li>• Whether they are accessible to services, amenities and public transport;</li> <li>• The avoidance of significant adverse affects on the environment and adjacent land uses; and</li> <li>• Incorporating appropriate design and landscaping standards.</li> <li>• Avoiding areas at high risk of flooding;</li> </ul> <p><b><del>D. Temporary planning permission may be granted for sites where they would help meet local need ahead of the development of permanent sites and where they would accord with the criteria above.</del></b></p> <p>E. Consideration will be given to allocating rural exception sites within specific rural settlements in the Allocations DPD and in Neighbourhood Plans where sufficient affordable sites to meet local need cannot otherwise be delivered.</p> <p>F. The criteria for assessing speculative proposals for rural exceptions via planning applications will be set out in the Allocations DPD and will give priority to protecting the most sensitive sites and those areas of land where development would significantly undermine the openness of the green belt.</p>			
MM112	Page 203-204	Table of outcomes, lead roles and	<p>Amend the paragraphs as follows:</p> <table border="1" data-bbox="880 1362 1644 1398"> <thead> <tr> <th data-bbox="880 1362 1140 1398">OUTCOMES</th> <th data-bbox="1140 1362 1393 1398">INDICATORS</th> <th data-bbox="1393 1362 1644 1398">TARGETS</th> </tr> </thead> </table>	OUTCOMES	INDICATORS	TARGETS
OUTCOMES	INDICATORS	TARGETS				

MM112 (Continued)		paragraphs 5.3.90 and 5.3.91				
			Sufficient new accommodation for Gypsies and Travellers and Travelling Showpeople of the right size, type and tenure has been provided to meet the needs of local communities as set out in the <b><u>Bradford Gypsy and Traveller Accommodation Assessment West Yorkshire Accommodation Assessment.</u></b>	The land supply of sites for Travellers and Travelling Showpeople IND7(H)  Annual gross pitch completions – district wide split between G&T pitches and pitches for Travelling Showpeople <b>Operational</b>	A deliverable five year land supply of sites for Travellers and Travelling Showpeople	
			<table border="1"> <thead> <tr> <th>LEAD ROLES</th> <th>DELIVERY MECHANISMS</th> </tr> </thead> <tbody> <tr> <td>CBMDC Developers – market housing InCommunities Other RSL's – social housing HCA Government <b><u>Local Community Groups including Leeds GATE</u></b></td> <td>Strategic Policy via Core Strategy Local policy and allocations <b>Householder SPD</b> Development Management Decisions Gypsy &amp; traveller Accommodation Assessment <b>SHMA</b></td> </tr> </tbody> </table>	LEAD ROLES	DELIVERY MECHANISMS	CBMDC Developers – market housing InCommunities Other RSL's – social housing HCA Government <b><u>Local Community Groups including Leeds GATE</u></b>
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CBMDC Developers – market housing InCommunities Other RSL's – social housing HCA Government <b><u>Local Community Groups including Leeds GATE</u></b>	Strategic Policy via Core Strategy Local policy and allocations <b>Householder SPD</b> Development Management Decisions Gypsy & traveller Accommodation Assessment <b>SHMA</b>					

			AMR
			<p><b>5.3.185</b> <del>5.3.190</del> The policy as proposed gives sufficient guidance to other site specific Local Plan documents and could be easily updated should new or updated evidence on accommodation needs be produced in the future. By identifying criteria which could be equally applied to applications for planning permission as for the Local Plan site selection and allocation process, the preferred policy would enable the Council to respond to any proposals for site developments which might come forward in the short term.</p> <p><b>5.3.186</b> <del>5.3.191</del> The policy allows for the inclusion within the Local Plan, should the evidence justify it, of rural exception sites and policies.</p>

## Section 5.4 Environment

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text <del>strike through</del>
MM113	Page 210	Policy EN1 Paragraph 5.3.17	<p>Amend paragraph as follows:</p> <p>Data has been collected from surveys about visits to areas of the South Pennine Moors that lie within Bradford. The visitor data relates to key factors such as frequency of visit, timing, access point, range of activities, mode of transport and distance travelled. Once this has been fully analysed, it will help to assess how potential impacts from an increasing number of visitors can be managed and the extent to which alternative areas of natural greenspace can divert pressure to less sensitive areas. <b><u>An SPD will be produced to identify contributions and secure mitigation measures, in relation to provision of natural greenspace, where this is required to mitigate the effects of increased recreation pressure upon the South Pennine Moors SPA/SAC</u></b></p>
MM114	Page 211	Amend text to policy EN1 Add section between section headed: Provision of Open Space and Recreation Facilities and Local Greenspace.	<p>Add new criterion, as follows:</p> <p><b><u>Mitigating Recreational Pressure on the South Pennine Moors SPA and SAC</u></b></p> <p><b><u>C. Residential developments which contribute to recreational pressure upon the South Pennine Moors SPA and SAC will be required to mitigate these effects through provision of new recreational natural greenspaces or improvements to existing open spaces.</u></b></p>
MM115	Page 215	Biodiversity and Geological Conservation – paragraph 5.4.32	<p>Add new text to end of paragraph 5.4.32, as follows:</p> <p>‘Policy EN2 seeks to protect biodiversity and geodiversity within the District and to identify principles for enhancing the overall biodiversity resource and stemming losses. It identifies a range of factors that need to be taken into account in identifying potential land for development, in taking into account</p>

			impacts on the districts biodiversity resource in decision-making and in making an assessment and managing proposals that come forward. <b><u>One of the most important principles in relation to conserving and enhancing biodiversity identified in the NPPF is that where ‘significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.’ It will therefore only be acceptable to consider compensation as a last resort and under circumstances where this can be carried out in accordance with best practice and guidance, such as that produced by the Chartered Institute of Ecology and Environmental Management.’</u></b>
MM116	Page 220	Policy EN2 Biodiversity and Geodiversity  Criterion A North and South Pennine Moors	Amend criterion policy sub title and criterion A, as follows:  <b><u>‘The North and South Pennine Moors SPAs and SACs</u></b>  A. Any development that would be likely to have a significant effect on a European Site either alone or in combination with other plans or projects will be subject to assessment under the Habitat Regulations at project application stage. If it cannot be ascertained that there will be no adverse effects on site integrity then the project will have to be refused <b><u>unless the derogation tests of Article 6(4) Habitats Directive can be met.’</u></b>
MM117	Page 220	Policy EN2 Biodiversity and Geodiversity – insert new criterion B, after A and before Locally Designated Sites	Insert new criterion B and sub title as follows:  <b><u>‘Sites of Special Scientific Interest</u></b>  <b><u>B Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.’</u></b>

MM118	Page 220 - 221	EN2 Criterion B	<p>Amend criterion reference to reflect new Criterion B and amend text as follows:</p> <p>‘Locally Designated Sites</p> <p><b>BC.</b> Development likely to have <del>an direct or indirect</del> adverse effect on a site of ecological/geological importance (SEGIs and RIGS) or a site of local nature conservation value (Bradford Wildlife Areas) will not be permitted unless it can be clearly demonstrated that there are reasons for the proposal which outweigh the need to safeguard the substantive nature conservation value of the site. Proposals that are likely to have an impact on such sites will be assessed according to the following criteria;</p> <ol style="list-style-type: none"> <li>1. Whether works are necessary for management of the site in the interests of conservation.</li> <li>2. Whether <del>adequate buffer strips and other</del> <b>appropriate</b> mitigation <b>measures, which could include adequate buffer strips, have</b> <del>has</del> been incorporated into the proposals to protect species and habitats for which the Locally <b>Designated</b> Site has been designated.</li> <li>3. The development would be expected to result in no overall loss of habitat, <b>through avoidance, adequate mitigation or, as a last resort, the provision of and mitigation could be expected to include</b> compensatory habitats adjacent to or within the vicinity of any losses proposed. Existing habitats and proposed mitigation <b>or compensatory measures</b> should be quantified.’</li> </ol>
MM119	Page 221	Policy EN2 Criterion C	<p>Amend criterion reference to reflect new Criterion B and amend text as follows:</p> <p>‘Habitats and Species outside Designated Sites</p> <p><del>C-D</del> Proposals that may have an adverse impact on important habitats and species outside designated sites need to be assessed according to the following criteria:-</p>

			<p>1. The potential for adverse impact on important/priority habitats that occur outside designated sites</p> <p>2. The potential for adverse impact on species of international, national and local importance</p> <p>3. The extent to which appropriate measures to mitigate any potentially harmful impacts can be identified and carried out.</p> <p><b><u>4 As a last resort, the extent to which appropriate measures to compensate any potentially harmful impacts can be identified and carried out.'</u></b></p> <p>The assessment needs to take account of:</p> <p>West Yorkshire Site Selection Criteria and Where relevant developers will be expected to submit (European) Protected Species surveys and other ecological assessment related information with their application.</p> <p><b><del>Development which would cause serious fragmentation of habitats, wildlife corridors or have a significantly adverse impact on biodiversity networks or connectivity will be resisted'</del></b></p>
MM120	Page 221	Policy EN2	<p>Amend criterion reference to reflect new Criterion B and amend text as follows</p> <p>'Enhancement</p> <p><b><del>D E.</del></b> Plans, policies and proposals should contribute positively towards the overall enhancement of the District's biodiversity resource.</p> <p>They should seek to protect and enhance species of local, national and international importance and to reverse the decline in these species.</p> <p>The Council will seek to promote the creation, expansion and improved management of important habitats within the district and more ecologically connected patchworks of grasslands, woodlands and wetlands. Opportunities for specific habitat creation within development proposals will be sought,</p>

			<p>including provision for future management.</p> <p><b><u>The Council will seek to establish coherent ecological networks that are resilient to current and future pressures. Development which would cause serious fragmentation of habitats, wildlife corridors or have a significantly adverse impact on biodiversity networks or connectivity will be resisted.</u></b></p> <p>Habitats of the moorland will be enhanced and landowners or occupiers will be actively encouraged to manage important areas for bird foraging to ensure continued provision of suitable habitat.</p> <p><b><u>Where supported by evidence</u></b> <del>T</del>the Council will recognise <del>the importance of</del> foraging/ commuting areas for protected and SPA/<b><u>SSSI species qualifying features</u></b> outside the statutory designated area as a material consideration in the preparation of development plans and in the determination of planning applications. Where <b><u>supported by evidence</u></b>, foraging sites, currently outside the SPA/SAC <b><u>and SSSI</u></b> will be considered for designation <b><u>as a Locally Designated Site.</u></b></p>
MM121	Page 224	Paragraph 5.4.66	<p>Amend paragraph 5.4.66, as follows:</p> <p>The historic environment faces a number of challenges resulting from minor, incremental alterations to significant and damaging changes which can affect the nature and authenticity of the structure or space. In most cases these changes are controlled by the Council through planning consents; however, <b><u>some changes which occur are unauthorised and unsympathetic harm to the significance of heritage assets can also occur through neglect, lack of maintenance or small incremental changes which can, over time erode the character of these assets.</u></b></p>
MM122	Page 238	Policy EN6 Energy Paragraph 5.4.125	<p>Amend paragraph 5.4.125 as follows:</p> <p>‘The regional study recognised commercial wind as having the potential to make a significant contribution to the renewable energy resource. There are a number of factors that influence a districts capacity to accommodate groups of</p>

			commercial scale wind turbines; wind speeds, the extent of the urban area and outlying settlements and landscape, environmental and ecological constraints. <b><u>Two strategic constraints that have an influence on the potential for wind energy in Bradford District were identified in previous work at a regional level; the South Pennine Moors Special Protection Area (also a Special Area of Conservation) and the consultation zone around Leeds/Bradford Airport. The study recognised that further work needed to be done at a district level. National planning guidance identifies in some detail particular planning considerations that relate to wind turbines.'</u></b>
MM123	Page 238	Paragraph 5.4.126	<p>Delete paragraph 5.4.126:</p> <p><del>'The findings of the latest regional study provides an evidence base to assist local authorities in developing a strategic approach to renewable and low carbon energy. The study recognised that further work needed to be done at a district level, particularly relating to evaluating the relationship between wind energy, landscape character and the natural environment. There is also a need to consider in association with the airport authority, whether advancements in technology would allow mitigation of the constraints associated with the airport.</del></p> <p>Replace Paragraph with the following:</p> <p><b><u>National planning guidance advises that in identifying suitable areas for renewable and low carbon energy 'local planning authorities will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts.'</u></b> The views of local communities likely to be affected are also considered to be important. <b><u>When identifying suitable areas it is important to set out the factors that will be taken into account when considering individual proposals in these areas, which may be dependent on investigatory work underpinning the identified area. Recent ministerial statements have emphasised the importance of addressing planning impacts identified by affected local communities and the benefits of identifying suitable areas through the plan-making process.</u></b></p>

MM124	Page 239	Paragraph 5.4.127	<p>Amend paragraph 5.4.127 as follows:</p> <p>‘Proposals will need to have an assessment of environmental, economic and social impacts. In relation to environmental impacts, some parts of the upland moorland areas are particularly unspoilt and are valued for tranquillity and wilderness appeal or are of historic importance because of their archaeology or other historic importance. <b><u>Landscape character areas are supported in national guidance as a tool for assessment.</u></b> Within Bradford open moorland provides the backdrop to the wide shallow valleys of the rivers Aire and Wharfe, where locations along the moorland edge offer long extensive views. Within such an open landscape, in areas where there are few other structures, vertical elements, such as wind turbines, can be prominent features, whereas smaller scale turbines are less intrusive when viewed in close conjunction with existing built and natural features. <b><u>West Yorkshire Ecology have produced guidance for ornithological information required to support small wind turbine developments.</u></b>’</p>
MM125	Page 239	Policy EN6 Criterion A (1)	<p>Amend criterion A (1)</p> <p>1. Identifying <b><u>suitable strategic areas and opportunities for</u></b> low carbon and renewable energy <b><u>opportunities.</u></b></p>
MM126	Page 240	Paragraph 5.4.130	<p>Delete paragraph 5.4.130 and renumber subsequent paragraphs:</p> <p><b><del>It is recognised that further work still needs to be carried out in order to achieve an assessment of strategic opportunities to secure decentralised energy. This will use as a starting point the recent study of Low Carbon and Renewable Energy Capacity in Yorkshire and the Humber. It will investigate the potential for larger scale low carbon schemes to serve new development and existing communities.</del></b></p>
MM127	Page 240	EN7 Flood Risk paragraph 5.4.132	<p>Add additional sentence at end of paragraph:</p> <p>‘The overall objectives are to appraise, manage and reduce the risk of flooding. Policy EN7, set out below, identifies principles to guide the process of</p>

			identifying locations for future development while seeking to reduce flood risk, assess proposals that come forward and adopt a positive approach to water management. <b><u>The NPPF defines flood risk as: ‘a combination of the probability and the potential consequences of flooding from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.’</u></b>
MM128	Page 242	EN7 Flood Risk paragraph 5.4.143	<p>Add additional sentence at end of paragraph:</p> <p>‘This approach reflects that in the NPPF, which requires Local Plans to take account of climate change over the longer term and plan new development to avoid increased vulnerability to the range of impacts arising from climate change. The sequential testing approach is supported and Technical Guidance has been produced setting out how this policy should be implemented. Key principles identified are; safeguarding land from development that is required for current and future flood management, using opportunities offered by new development to reduce the causes and impacts of flooding and developing policies to manage flood risk from all sources. <b><u>When applying sequential testing principles to the choice of sites for future development, where data exists, all sources of flood risk will be taken into account, including those associated with ground water flooding.</u></b>’</p>
MM129	Page 249	Policy EN8 Criterion B	<p>Amend criterion B, as follows:</p> <p>‘Proposals for development of land which may be contaminated or unstable must incorporate appropriate investigation into the quality of the land. Where there is evidence of contamination <b><u>or instability</u></b>, remedial measures must be identified to ensure that the development will not pose a risk to human health, public safety and the environment. Investigation of land quality must be carried out in accordance with the principles of best practice.’</p>

MM130	Page 251	EN8 Insert new paragraph following existing paragraph 4.5.181 and before existing paragraph 4.5.182	<p>Add new paragraph as follows:</p> <p><b><u>The Council will undertake a programme of modelling to assess the air quality effects of proposed allocations on areas where air quality is a matter of concern, including European Sites designated for nature conservation importance. The programme will assess air quality effects from local roads in the vicinity of proposed allocations on nearby European Sites (including those from increased traffic, construction of new roads and up[grading of existing roads), as recommended in work carried out on Habitats Regulations Assessment. The impacts on vulnerable locations from air quality effects of increased traffic on the wider road network will also be tested using traffic projections and distance criterion. This will be followed by local air quality modelling where required at the pre-allocations testing stage and the development of any mitigation measures required to ensure that there are no adverse effects on the European Sites.</u></b></p>
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## Section 5.5 Minerals

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text <del>strike through</del>
MM131	Page 255	Policy EN9 Criterion A	<p>Add additional criteria to A to be numbered 1 and re-number the existing criteria 1, 2, 3 and 4 as 2, 3, 4 and 5. New Criterion 1 to read:</p> <p><b>1. <u>For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence.</u></b></p>
MM132	Page 256	Policy EN9 Criterion B	<p>Add additional criteria to B to be numbered 1 and re-number the existing criteria 1, 2, 3 and 4 as 2, 3, 4 and 5. New Criterion to read:</p> <p><b>1. <u>For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence.</u></b></p>
MM133  MM133 (Continued)	Pages 258 – 259	Paragraph 5.5.14	<p>Insert four new paragraphs to follow paragraph 5.5.13, as follows:</p> <p><b><u>5.5.14 The Local Aggregates Assessment for West Yorkshire 2012 (WY LAA) confirms that the sub-region is heavily dependant upon higher specification crushed rock aggregate imports from neighbouring authorities, and in particular Derbyshire and North Yorkshire. Substantial crushed rock aggregate reserves exist within West Yorkshire; however the majority of these reserves do not comprise concreting or road stone grade materials and the quality of the sub-region's stone resources is such that any significant future reduction in the reliance of West Yorkshire on high specification aggregate imports from neighbouring authorities is considered to be unlikely.</u></b></p>

**Table: TABEN10**

<b>West Yorkshire Crushed Rock (CR) Aggregate Landbank Figures</b>				
<u>Estimated CR Consumption 2009 (tonnes)</u>	<u>Estimated CR Imports from Neighbouring Authorities 2009 (tonnes)</u>	<u>Ten Year Average Annual CR Sales (2003-2012) (tonnes)</u>	<u>CR Reserves as of 31 Dec 2012 (tonnes)</u>	<u>Landbank (Reserves/ Avg Sales)</u>
<u>2,330,000</u>	<u>1,499,505</u>	<u>1,000,000</u>	<u>28,500,000</u>	<u>28.5 Years</u>

Note: Above Figures are taken from The Local Aggregate Assessment for West Yorkshire 2012, wherein full details of how these figures have been derived can be found.

**5.5.15 The landbank calculation set out in the LAA, as repeated in table TABEN10 above, represents a calculation of the length of time it would take to exhaust current permitted reserves of Crushed Rock within West Yorkshire if average annual sales continue at historic average levels. However the fact that this figure is in excess of the 10 year minimum recommended within the NPPF in no way implies that sufficient crushed rock reserves exist within West Yorkshire to meet West Yorkshire’s construction aggregate needs. In fact the figures set out in the WY LAA imply that the level of aggregate product within West Yorkshire could satisfy, at most, 40% of demand, with imports from neighbouring authorities estimated to be almost 50% higher than indigenous production.**

**5.5.16 In order to secure continuity of supply of crushed rock the West Yorkshire Authorities have engaged with neighbouring authorities, in particular Derbyshire and North Yorkshire, through the Aggregates Working Party and through the production of the WYLAA. This has resulted in the adoption of LAAs by those neighbouring authorities which provide for the continuation of levels of extraction which are sufficient to allow for the continued supply of aggregates into West Yorkshire.**

**5.5.17 Although Bradford is not a significant aggregate producer the small quantities of crushed sandstone aggregate by-product which are produced do contribute towards redressing the trade imbalance highlighted above and absorbing some local demand for lower specification bulk aggregates and building sand. Therefore, notwithstanding the fact that the West Yorkshire landbank calculated in the 2012 WYLAA (based upon historic average sales)**

			<b><u>is substantially in excess of the 10 year minimum it is considered inappropriate to adopt a strongly negative policy position towards the extraction of crushed rock aggregates in the District.</u></b>
MM134	Pages 263 – 264	Paragraph 5.5.20	<p>Delete paragraph 5.5.20 and replace with four new paragraphs, as follows:</p> <p><del>5.5.20 Research undertaken at a regional level and the emerging Local Aggregates Assessments of neighbouring authorities have identified a potential future shortfall in meeting the demand for sand and gravel within West Yorkshire from local land won extraction. Therefore policy EN11 confirms the Council's commitment to taking any appropriate opportunities to contribute towards the provision of a 7 year sand and gravel landbank level within West Yorkshire by supporting sand and gravel extraction within an area of search constrained by specified environmental criteria.</del></p> <p><b><u>5.5.20 The Local Aggregates Assessment for West Yorkshire 2012 (WYLAA) identifies that the sub-region is heavily dependant upon sand and gravel imports from neighbouring authorities, and in particular 18 March 2015 North Yorkshire. Very limited sand and gravel reserves exist within West Yorkshire, with only two relatively small sites reported in the WYLAA (located in Kirklees and Wakefield), possessing reserves totalling 1.6 million tonnes. No reserves of sand and gravel exist within the Bradford District. British Geological Survey (BGS) resource maps indicate that some potentially viable sand and gravel resources may remain within West Yorkshire, including river terrace deposits along the Wharfe and Aire Valleys in the Bradford District. However previous BGS research has identified minerals extraction industry scepticism that the remaining resource would be economically viable to exploit due to the constrained nature of the remaining deposits.</u></b></p>
MM134 (Continued)			

**Table: TABEN11**

<b>West Yorkshire Sand and Gravel (S&amp;G) Landbank Figures</b>				
<u>Estimated S&amp;G Consumption 2009 (tonnes)</u>	<u>Estimated S&amp;G Imports from Neighbouring Authorities 2009 (tonnes)</u>	<u>Ten Year Average Annual S&amp;G Sales (2003-2012) (tonnes)</u>	<u>S&amp;G Reserves as of 31 Dec 2012 (tonnes)</u>	<u>Landbank (Reserves/ Avg Sales)</u>
810,000	490,000	130,000	1,600,000	12.3 Years

Note: Above Figures are taken from The Local Aggregate Assessment for West Yorkshire 2012, wherein full details of how these figures have been derived can be found.

**5.5.21 The landbank calculation set out in the LAA, as repeated in table TABEN11 above, represents a calculation of the length of time it would take to exhaust current permitted reserves of Sand and Gravel within West Yorkshire if average annual sales continue at historic average levels. However the fact that this figure is in excess of the 7 year minimum recommended within the NPPF in no way implies that sufficient sand and gravel reserves exist within West Yorkshire to meet West Yorkshire’s construction aggregate needs. In fact the figures set out in the WY LAA imply that West Yorkshire historic production could satisfy, at most, 16% of demand, with imports from neighbouring authorities estimated to be almost 4 times higher than indigenous production.**

**5.5.22 In order to secure continuity of supply of sand and gravel the West Yorkshire Authorities have engaged with neighbouring authorities, in particularly Derbyshire and North Yorkshire, through the Aggregates Working Party and through the production of the WYLAA. This has resulted in the adoption of LAAs by those neighbouring authorities which provide for the continuation of levels of extraction which are sufficient to allow for the continued supply of aggregates into West Yorkshire.**

**5.5.23 Notwithstanding the fact that the West Yorkshire landbank calculated in the 2012 LAA, based upon historic average sales, is in excess of the 7 year minimum, given West Yorkshire’s reliance on 18 March 2015 imports from neighbouring authorities, it is considered inappropriate and unsustainable to adopt a policy position that would not be supportive of any environmentally acceptable proposals for the extraction of sand and gravel**

			<b><u>resources within the District which may come forward within the plan period. Therefore policy EN11 is supportive in principle of proposals for sand and gravel extraction, within an area of search constrained by specified environmental criteria, except in the unlikely event that the LAA indicates that no additional permitted reserves of sand and gravel are required.</u></b>
MM135	Pages 263 – 265	Policy EN11 criterion D (1) and D (2)	<p>Amend section title as follows:</p> <p>‘Section Title: Sand, Gravel, Fireclay, <b><u>Coal</u></b> and Hydrocarbons <b><u>(oil &amp; gas)</u></b>’</p> <p>Amend Policy Title as follows:</p> <p>‘Policy Title: Policy EN11: Sand, Gravel, Fireclay, <b><u>Coal</u></b> and Hydrocarbons <b><u>(oil &amp; gas)</u></b>’</p> <p>Amend criterion D1 and D2 as follows:</p> <p>‘D.1. Proposals associated with the exploration and appraisal of <b><u>hydrocarbons (oil &amp; gas)</u></b> resources will be supported in principle providing that the proposal accords with other policies within the Local Development Plan and all of the following criteria are met:</p> <p>D.2. Proposals for the commercial production of <b><u>hydrocarbons (oil &amp; gas)</u></b> will be supported in principle providing that the proposal accords with other policies within the Local Development Plan and all of the following criteria are met:</p>
MM136	Page 264	Policy EN11 Criterion C	<p>Amend criterion C as follows:</p> <p>‘C. Proposals for coal extraction will not be permitted unless the coal resource would otherwise be sterilised by another form of development or all of the following criteria are met:</p> <p>1. Any viable fireclay resources will also be recovered, and;</p> <p><b><del>2. The applicant can demonstrate that the quality of the coal resource proposed to be extracted is such that it is suitable for use as an energy mineral, and;</del></b></p> <p><b><del>3.</del> 2. One of the following circumstances applies:</b></p>

			<p>i. The proposals are environmentally acceptable, or can be made so by planning conditions or obligations, or;</p> <p>ii. The proposal provides national, local or community benefits which clearly outweigh the likely impacts of the development'</p>
MM137	Page 270	Policy EN12 Criterion B (4)	<p>Amend criterion B (4) as follows:</p> <p>4. The applicant has demonstrated that non of the sandstone resource beneath the site could be extracted without prejudicing the development of the site <b><u>due to ground level or engineering issues, or;</u></b></p>

## Section 5.6 Waste

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification
			New text: <b><u>underlined</u></b> Deleted text <del>strike through</del>
MM138	Page 276	Policy WM1 paragraphs 5.6.1 – 5.6.3	<p>Amend paragraphs 5.6.1 to 5.6.3, as follows:</p> <p>Waste is often seen as a by-product of living, to be disposed of by the cheapest possible method. Bradford has traditionally been reliant upon sending waste to landfill sites outside the District and there is limited <b><u>waste management</u></b> infrastructure <del>to deal with waste within the Bradford District to deal with certain types of waste, in particular Local Authority Collected Waste (LACW) and Commercial and Industrial Waste</del> by any other means.</p> <p>However, the policy direction for waste management <del>is changing</del> <b><u>has changed over the years.</u></b> The European Waste Framework Directive <b>2008</b> requires appropriate measures to prevent or reduce of waste production and its harmfulness and secondly the recovery of waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials, or the use of waste as a source of energy.</p> <p>This European guidance is subsequently delegated to a national level through the Waste (England and Wales) Regulations 2011, <b><u>National Planning Policy for Waste (NPPW) Oct 2014</u></b></p>

			<p><del>and the Waste Management Plan for England Dec 2013, and planning policy Statement 10,</del> National Planning Policy for Waste (NPPW) Oct 2014 and the Waste Management Plan for England Dec 2013, which set out how England will meet the European directives on waste and deliver a shift towards a more sustainable management of waste at a local level.</p> <p>In an effort to achieve greater sustainability and <u>net</u> self sufficiency, the <b>current</b> approach to waste management <del>is no longer acceptable</del> <b><u>needs to improve and change further</u></b>. It is essential that greater emphasis is placed on avoiding waste production and managing waste produced in the most sustainable way, making use of waste as a resource and only disposing of the residue that has no value.</p> <p>And amend paragraph 5.6.7, as follows:</p> <p>Policy WM1 creates a strategic planning framework to minimise the negative effects of the generation and management of waste on human health and the environment. It further states that waste policy should encourage a reduced use of resources, and favours the practical application of the waste hierarchy. One of the primary mechanisms of applying this application is the delivery of an adequate range of waste management facilities to ensure waste is treated and disposed of in a sustainable and environmentally acceptable way, balancing the economic, social and environmental needs of the District. A range of new facilities shall be needed to deal with tonnages of Commercial and Industrial (C&amp;I) and <del>Solid Municipal Waste (MSW – Council collected waste)</del> <b><u>Local Authority Collected Waste (LACW)</u></b> arisings.</p>
MM139	Page 276	Paragraph 5.6.8 – 5.6.14	<p>Insert new text setting and sub section title to follow paragraph 5.6.9, as follows:</p> <p><b><u>Evidence</u></b></p> <p><b><u>5.6.9 Information relating to the specific details of this evidence base can be found within the Waste Management DPD and the supporting Waste Needs Assessment, Capacity Gap Analysis and Requirement Study (2014).</u></b></p> <p><b><u>WASTE ARISING - CURRENT POSITION</u></b></p> <p><b><u>5.6.10 The future scale of waste arisings and the waste management facilities which need to be planned for in Bradford District is critical. This section considers the need for new waste management facilities.</u></b></p>
MM139 (Continued)			

**5.6.11** Analysis is based on the Council’s Waste Data Forecasting Model. For a full explanation of the methodology and sources used to calculate waste arisings and forecasts please refer to Bradford Waste Needs Assessment, Capacity Gap Analysis and Requirement Study.

**5.6.12** The majority of current waste arisings within Bradford District come from Commercial and Industrial Waste (C&I), Construction, Demolition and Excavation Waste (CDEW) and Local Authority Collected Waste (LACW) which combined equate to just under ¾ of the total arisings. Agricultural waste has increased significantly from previous figures, mainly due to the new legislation coming into force in 2010. Table 1 sets out the current waste arisings for Bradford.

**Table WM1: Summary Total Waste Arisings in Bradford (2012)**

<u>Type of Waste Arising</u>	<u>Arisings (Tonnes)</u>	<u>%</u>
<u>Agricultural Waste</u>	<u>283,132</u>	<u>20.20</u>
<u>Commercial Waste</u>	<u>254,314</u>	<u>18.20</u>
<u>Industrial Waste</u>	<u>219,773</u>	<u>15.71</u>
<u>Construction Demolition and Excavation</u>	<u>350,000</u>	<u>25.02</u>
<u>Hazardous Waste</u>	<u>19,155</u>	<u>1.37</u>
<u>Local Authority (Including Calderdale</u>	<u>272, 668</u>	<u>19.50</u>
<u>Total***</u>	<u>1,399,042</u>	<u>100</u>
<u>Waste Water**</u>	<u>1,024,568</u>	

**Source: Environment Agency Waste Data Interrogator (WDI) 2012\*. Yorkshire Water 2014\*\*.**

**Total Being Planned for in the Waste Management DPD through either planning policy or site allocations or a combination of both\*\*\***

**5.6.13** The projected forecast waste arisings for Bradford District draws on the most reliable and robust data available for each waste stream. The Council are taking forward a ‘Growth’ based scenario, which follows a growth rate of 33% estimated Gross Value Added (GVA) for all the waste streams of Commercial, Industrial, Agricultural, CDEW and Hazardous. A separate growth rate has been applied to Local Authority Collected Waste to ensure alignment with the Municipal Waste Minimisation and Management Strategy, and zero static growth rate applied to

MM139  
(Continued)

**Agricultural waste.**

**Table WM2: Forecast Waste Arisings in Bradford (2013–30) using Bradford Waste Forecasting Model**

<b><u>Waste Stream</u></b>	<b><u>2013</u></b>	<b><u>2018</u></b>	<b><u>2022</u></b>	<b><u>2026</u></b>	<b><u>2030</u></b>
<b><u>Agricultural Waste*</u></b>	<b><u>283,133</u></b>	<b><u>283,133</u></b>	<b><u>283,133</u></b>	<b><u>283,133</u></b>	<b><u>283,133</u></b>
<b><u>Commercial and Industrial Waste*</u></b>	<b><u>513,830</u></b>	<b><u>538,326</u></b>	<b><u>558,882</u></b>	<b><u>580,329</u></b>	<b><u>602,721</u></b>
<b><u>CDEW<sup>f</sup></u></b>	<b><u>447,604</u></b>	<b><u>461,194</u></b>	<b><u>472,360</u></b>	<b><u>483,800</u></b>	<b><u>495,515</u></b>
<b><u>Hazardous Waste*</u></b>	<b><u>19,153</u></b>	<b><u>19,764</u></b>	<b><u>20,267</u></b>	<b><u>20,782</u></b>	<b><u>21,311</u></b>
<b><u>Local Authority Collected Waste**</u></b>	<b><u>306,148</u></b>	<b><u>338,736</u></b>	<b><u>358,179</u></b>	<b><u>369,852</u></b>	<b><u>381,188</u></b>
<b><u>Total Tonnes</u></b>	<b><u>1,569,868</u></b>	<b><u>1,641,153</u></b>	<b><u>1,692,821</u></b>	<b><u>1,737,896</u></b>	<b><u>1,783,868</u></b>

**Source: \*Bradford Council Waste Data Forecasting Model, \*\*Bradford Council Waste Strategy Team**

**5.6.14 While these levels should be planned for in terms of the provision of expanded and new facilities, the Waste Management DPD policies will also ensure that opportunities to reduce, re-use and recycle waste will be maximised and that some flexibility and contingency in the levels of future waste management facilities**

			<b><u>provision will be made on a, monitor and manage basis.</u></b>
MM140	Page 276	Paragraph 5.6.8	<p>Insert new paragraphs to follow from new paragraph 5.6.14 above, as follows:</p> <p><b><u>CROSS-BOUNDARY WORKING</u></b></p> <p><b><u>5.6.15 The Local Plan must give consideration to cross-boundary issues when setting spatial policy and waste management allocations.</u></b></p> <p><b><u>5.6.16 Bradford Council will continue to work collaboratively with neighbouring local authorities and other local authorities where waste import / export relationships exist now and are recognised to likely continue in to the future recognising the importance of the duty to cooperate in achieving net self sufficiency for Bradford. This will ensure a collaborative cross-boundary approach to waste management is established and maintained. In addition to the continued active participation in the Yorkshire and Humber Waste Technical Advisory Body, the Council will:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Share with neighbouring authorities and statutory bodies all relevant information, data and its analysis relating to current and future waste arisings across all waste streams, technologies and performance in reducing, re-using, recycling and disposing of waste;</u></b></li> <li>• <b><u>Work collaboratively on emerging Local Plans and their future updates where appropriate and practical;</u></b></li> <li>• <b><u>Provide comment on waste related planning applications where appropriate to do so;</u></b></li> <li>• <b><u>Support the commissioning of joint monitoring reviews, data updates and specific waste related studies to support regional and sub-regional waste management and future policy development where appropriate and practical.</u></b></li> </ul> <p><b><u>Attend and contribute to any groups, bodies or meetings to support cross boundary working on waste.'</u></b></p>
MM141	Page 277	Policy MW1 supporting text	<p>Insert new paragraphs and section title to follow from new paragraph 5.6.16 above, as follows:</p>

			<p><b><u>'Policy WM1</u></b></p> <p><b><u>5.6.17 There is a need to consider how waste management policy developed within the Local Plan can deliver against the Core Strategy objectives and those within the Waste Management DPD. This includes the extent to which it is suitable to apply a waste management hierarchy within future policy.</u></b></p> <p><b><u>5.6.18 Policies WM1 and WM2 establish the strategic framework and spatial direction for managing waste in the Bradford District. The strategy will be implemented through more detailed policies and related documents as set out in the Waste Management DPD, which also shows specifically how sufficient capacity has been identified and assessed to meet the waste forecasts.'</u></b></p>
MM142	Page 277	Policy WM1	<p>Amend Policy WM1 as follows:</p> <p>'Policy WM1: Waste Management</p> <p>A. The Council will work with its partners and neighbouring authorities to integrate strategies for waste management in Bradford and at the sub-regional and regional levels. All forms of waste will be managed in accordance with the <b><u>principles of the</u></b> waste management hierarchy <b><u>in the following order of priority</u></b> :</p> <ol style="list-style-type: none"> <li><b><u>1. Waste prevention: avoiding the creation of waste in the first instance; then</u></b></li> <li><b><u>2. Preparing for Re-use: making best use of existing and new facilities; then</u></b></li> <li><b><u>3. Recycling and composting: making best use of existing and new facilities; then</u></b></li> <li><b><u>4. Energy Other recovery: making use of technologies that recover energy from waste; then</u></b></li> <li><b><u>5. Disposal: including the use of landfill as a last alternative.</u></b></li> </ol> <p>B. The Council will plan <del>to ensure that sufficient capacity is located within the District to accommodate</del> <b><u>for the most sustainable and environmentally effective management of</u></b> forecast waste arisings of all types of waste ,-reducing the reliance on other authority areas. In identifying waste management sites within the District the Council will give regard to cross boundary issues, including waste movement and location of facilities in adjacent areas; <b><u>working collaboratively with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management and allow the District to become net</u></b></p>

			<u>self-sufficient.'</u>
MM143	Page 277	Policy WM1 Supporting text	<p>Insert new paragraphs after policy MW1, as follows:</p> <p><b><u>5.6.19 The Council's primary delivery mechanism for Policy WM1 will be the allocation of land for an adequate range of waste management facilities through the Waste Management DPD. This should be provided to ensure that waste is treated and disposed of in a sustainable and environmentally acceptable way, balancing the economic, social and environmental needs of the District.</u></b></p> <p><b><u>5.6.20 The Waste Management DPD will also put forward a number of planning policies to support the delivery of allocated and unallocated waste management sites, and safe guard any existing waste management infrastructure vital to the delivery the waste hierarchy.</u></b></p> <p><b><u>5.6.21 The Municipal Waste Minimisation and Management Strategy (and subsequent updates) will also dictate how the Council will directly contribute towards moving waste up the hierarchy through future waste operations.</u></b></p>
MM144	Page 277	Policy MW1 Supporting text	<p>Add new sub section heading and paragraphs following new paragraph 5.5.21 above as follows:</p> <p><b><u>IDENTIFYING WASTE MANAGEMENT SITES</u></b></p> <p><b><u>5.6.22 European and national policy relating to forward planning for waste management requires Waste Planning Authorities to consider the most appropriate locations for waste facilities in the future. This should include the relationship of the site with the waste arisings, minimising the movement of waste, and also the consideration of the potential impact of waste management facilities on their surrounding environs. Consideration is given to the need to identify sites for the principal waste streams</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>LACW – sites will be identified for this waste stream, as the evidence base demonstrates a shortfall in a range of waste management facilities.</u></b></li> <li>• <b><u>Commercial and Industrial – sites will be identified for this waste stream, as the evidence base demonstrates a shortfall in a range of waste management</u></b></li> </ul>
MM144 (Continued)			

<p>MM144 (Continued)</p>			<ul style="list-style-type: none"> <li>• <u>facilities.</u></li> <li>• <u>CDEW - there are number of existing sites transferring and managing this waste stream. On site recycling upon demolition and development will be encouraged to move management of this waste up the hierarchy. Sites will not be specifically identified for this waste stream.</u></li> <li>• <u>Agricultural – the majority of this waste stream will be managed within farm holdings, small amounts of ‘specialised’ agricultural waste can be managed at C&amp;I facilities. Future waste arisings are identified in the evidence base as being very small, therefore this stream will continue on farm holdings, existing sites and identified C&amp;I sites.</u></li> <li>• <u>Hazardous &amp; Low Level Radioactive waste – Both these waste streams generate very low levels of waste arisings. Such low levels do not quantify the allocation of further sites specifically for the management of these waste types, the economies of scale are such that the provision of sites within the Plan area for the very small quantities of arising’s would be unlikely to be viable.</u></li> <li>• <u>Residual Waste for Final Disposal (i.e. Landfill) - the existing sub-regional and regional capacity does not quantify the allocation of a site for a new landfill for the disposal of residual waste following treatment<sup>1</sup>.</u></li> </ul> <p><b><u>5.6.23 Bradford Council will only be seeking to allocate Waste Management Facilities for the treatment of Local Authority Collected Waste (LACW) and Commercial and Industrial Waste. This strategic approach is based on the following factors:</u></b></p> <ul style="list-style-type: none"> <li>• <u>LACW and C&amp;I are consider priority waste streams;</u></li> <li>• <u>Need to reduce biodegradable waste not being managed;</u></li> <li>• <u>Sites will be large scale and of strategic importance;</u></li> <li>• <u>Waste arisings are of a sufficient scale to allow the delivery of viability facilities;</u></li> <li>• <u>Other waste streams are capable of being managed ‘on-site’;</u></li> <li>• <u>Treating other waste streams at facilities with the sub-region / region is the most sustainable and environmentally effective approach.</u></li> </ul> <p><b><u>5.6.24 Through the Waste Needs Assessment, Capacity Gap Analysis and Requirement Study (2014), it has been identified that there is a capacity gap in the waste management facilities based on the current and future waste arisings.</u></b></p>
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<sup>1</sup> Memorandum of Understanding/Minutes/Agreements – Yorkshire and Humber Waste Technical Advisory Body

**5.6.25 Table 3 establishes the current capacity gap, within the Bradford District applying the Growth Scenario with maximised recycling based on the Waste Needs Assessment Capacity Gap Analysis and Requirement Study (2014). This existing capacity gap will be reviewed and updated (if necessary) through the Waste Management DPD. The Waste Management DPD will also assess the future capacity gap for the plan period, ensuring the sufficient allocation of appropriate sites over the plan period.**

**<sup>1</sup> Memorandum of Understanding/Minutes/Agreements – Yorkshire and Humber Waste Technical Advisory Body - [Footnote]**

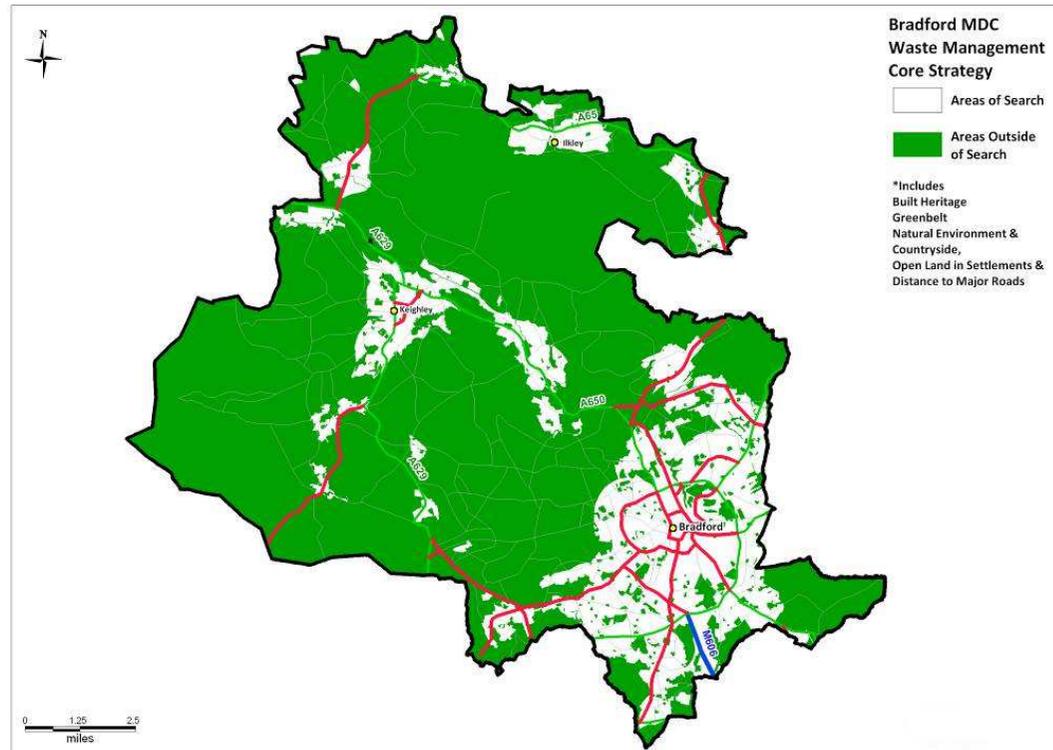
**Table WM3 – Existing Waste Management Capacity Gap (tonnes)**

<u>Waste Management</u>	<u>Existing Capacity Gap (Tonnes)</u>
<u>Landfill (non-hazardous)</u>	<u>59,439</u>
<u>Landfill (hazardous)</u>	<u>74</u>
<u>Landfill (CD&amp;E)</u>	<u>201,200</u>
<u>Energy recovery (LACW &amp; C&amp;I)</u>	<u>203,169</u>
<u>Incineration (Specialist High Temp)</u>	<u>833</u>
<u>Recycling (C&amp;I and LACW)</u>	<u>400,084</u>
<u>Recycling (aggregates CD&amp;E)</u>	<u>112,975</u>
<u>Recycling (specialist materials– including metal recycling, End of Life Vehicles and WEEE)</u>	<u>-1,059</u>
<u>Composting</u>	<u>34,340</u>

				<u>Residual Mechanical Treatment</u> <u>Treatment Plant (including Anaerobic Digestion, specialised treatment of biodegradable liquids and wastes, organic waste treatment by distillation)</u>	<u>109,146</u> <u>-52,376</u>	
MM145	Page 278	Policy WM2 & supporting text	<p>Amend policy WM2 and supporting text as follows:</p> <p><b><u>5.6.26 Policy WM2 establishes the principles of identifying appropriate locations for waste management facilities, establishing a strategic framework for the Waste Management DPD to allocate enough land for recycling and treatment to take place, to ensure that less waste goes to landfill.</u></b></p> <p><b>Policy WM2: Waste Management</b></p> <p>A. Sites for waste management facilities will be identified to deal with all <del>Municipal Solid Waste (MSW)</del> <b><u>Local Authority Collected Waste (LACW)</u></b> and Commercial &amp; Industrial Waste (C&amp;I) arisings within Bradford District. Sites will need to best meet environmental, economic and social needs.</p> <p>B. In identifying and selecting sites for the management of waste, an Area of Search (See Appendix 7) is established as the framework for identifying sites for new and expanded waste management facilities. Within the Area of Search, the following order of priority will be adopted:</p> <ol style="list-style-type: none"> <li>1. The expansion and co-location of waste facilities on existing, operational sites;</li> <li>2. Established and proposed employment and industrial sites where modern facilities can be appropriately developed;</li> <li>3. Other previously developed land within the Area of Search, including mineral extraction and landfill sites;</li> </ol>			

			<p>4. Greenfield, previously undeveloped sites within the Area of Search; 5. Sites within the Green Belt</p> <p>C. All potential waste management sites will be subject to detailed assessment of their individual characteristics, <b><u>cumulative impact, economic viability and the impacts of and the implications of</u></b> any waste development on surrounding areas. The Waste Management DPD will establish the detailed site development criteria using a similar approach to site identification as applied within the development of strategic <b><u>and local</u></b> criteria to include consideration of:</p> <p>1. Policy alignment; 2. Physical constraints to site development; 3. Proximity to waste arisings; 4. Adjacent uses.'</p>
MM146	Page 279	Policy WM2 supporting text	<p>New Supporting text to follow WM2, as follows:</p> <p><b><u>5.6.27 Figure WM1 illustrates the Area of Search – including the application of the Green Belt as a constraint (i.e. the Area of Search excluding areas within the Green Belt)</u></b></p> <p><b><u>Figure WM1 – Identified Area of Search</u></b></p>
MM146			

(continued)



**5.6.28 The Council is of the opinion that taking into account the proximity of facilities to major settlements is a key factor in providing a network of facilities to ensure waste can be disposed of and Local Authority Collected Waste can be recovered in one of the nearest appropriate installations. By limiting the area of search to major settlements within the District, the Council is of the opinion the 'proximity principle' is fully embedded into the policy.**

**5.6.29 The need to avoid detrimental impacts upon the natural environment and countryside, built heritage, open land within settlements, adverse impacts on the South Pennine Moors SAC/SPA and a proximity to 1km of major roads is also considered to be compliant with the latest national guidance set out in the National Planning Policy for Waste when identifying suitable sites and areas for proposed waste management facilities.**

MM146  
(continued)

		<p><b>5.6.30 <u>Further information on the site identification and assessment can be found in the Waste Management DPD and the supporting Site Assessment Report.</u></b></p> <p>Delete paragraphs 5.6.9 and 5.6.10:</p> <p><del><b>Policies WM1 and WM2 set in place the principles of identifying appropriate locations for waste management facilities. These principles are key to ensuring much needed waste management infrastructure is delivered in the most sustainable and effective way for the treatment of waste and the avoidance of potential negative impacts.</b></del></p> <p><del><b>Policies WM1 and WM2 provide the strategic framework for developing the detailed policies in the Waste Management DPD of the Local Plan to achieve sustainable waste management. It will be consistent with the latest national policy guidance and will make provision for the forecast waste tonnages identified within the supporting Evidence Base Report. It will set out a detailed planning strategy and include criteria-based development management policies, as well as sites for new waste management facilities. These will include sites for Municipal Solid Waste and Commercial and Industrial Waste.</b></del></p>
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## Section 5.7 Design

No main modifications

## Section 6 Implementation and Delivery

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification
			New text: <u>underlined</u> Deleted text <del>strike through</del>
MM147	Page 302	Paragraph 6.23	Add to 'the sorts of matters for which planning obligations will be sought' the following additional point:  <b><u>mitigation for impacts to the South Pennine Moors SPA/SAC.</u></b>
MM148	Page 303	Paragraph 6.26	Add additional sentence at end of paragraph 6.26, as follows:  <b><u>A management and mitigation strategy and SPD will be produced which will set out a framework for delivering mitigation measures in relation to impacts on the South Pennine Moors SPA/SAC.</u></b>

## Section 7 Monitoring

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification
			New text: <u>underlined</u> Deleted text <del>strike through</del>
MM149	Page 313	Table MO1. Target for Indicator IND1(EJ)	Annual delivery of <del>2897</del> <u>1600</u> jobs.

## Section: Appendices

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text <del>strike through</del>
MM150	Page 348	Appendix 4: Parking Standards	<p>Insert the following definition:</p> <p><b><u>Minimal Operational Requirement: Parking that is required for a development to operate as set out in the Transport Assessment or Transport Statement, including but not exclusively; Operational parking space for commercial and service vehicles (that provides for manoeuvring space to enable the largest vehicle required to exit the site in forward gear); loading bays and disabled parking. Residential development that requires operational parking, such as residential or care homes, should, as far as possible, make provision within the site. This encompasses servicing, business visitors and employees who require daily access to their vehicles for their jobs. It does not include commuter parking.</u></b></p>
MM151	Page 349	Appendix 4: Parking Standards	<p>Amend standard in relation to C3 City and Town centres as follows:</p> <p>C3 Dwellings (City and Town Centres) – <del>Average of 1 space per unit</del> <b><u>minimal operational requirements</u></b></p>
MM152	Page 356	Appendix 6 Paragraphs 1.3 to 1.5	<p><b>Amend the text as follows:</b></p> <p>‘The Housing Trajectory and Previously Developed Land Scenarios</p> <p>1.3 Paragraph 47 of the NPPF states that Local Planning Authorities should illustrate the expected rate of housing delivery through a housing trajectory covering the plan period. <del>Previous supplementary guidance to PPS3 set out details on housing trajectories and since the Government are yet to finalise the range of technical guidance which will support the NPPF that guidance has, as with the CSFED, been used in the production of the updated housing trajectory in this appendix.</del></p> <p>1.4 Housing trajectories support the ‘plan, monitor and manage’ approach to housing</p>

<p>MM152 (Continued)</p>		<p>delivery by showing past and <del>estimating</del> <b>indicating</b> future performance by considering past rates of housing completions and projected completions to the end of the specified Local Plan period. Housing trajectories are normally developed as part of the supporting evidence base underpinning LDF production but once established they are used to monitor performance and are updated annually via the production of the Council's Annual Monitoring Report. The trajectories are not however policies.</p> <p>1.5 The housing trajectory included at the end of this section has been based on the following elements:</p> <ul style="list-style-type: none"> <li>• Actual completions over the period 2004-13 as assessed and set out within previous Annual Monitoring Reports. These years comprise a period when the overall housing market was initially in a buoyant state and also when there was strong delivery on windfall sites particularly within Bradford City Centre but within which there has been a subsequent period comprising a deep and unprecedented slump in the housing market. Both supply and demand has been severely impacted by recession, toxic debt and its effect on global and national credit, severely restricted mortgage lending to prospective house buyers and severely restricted borrowing to the construction industry reducing its capacity to start new schemes or complete existing ones.</li> <li>• <b><u>Projected completions over the plan period based on Policy HO1 and under an assumption of both significantly improved land supply and significantly improved economic and housing market conditions. Estimated performance over the next few years, within which the effects of the recession are expected to linger and recovery is expected to be sluggish. It is important to stress that while housing completions in some parts of the country are showing signs of increase there is yet to be any significant pick up in completions within Bradford district. A cautious approach has therefore been taken in estimating completions over the first part of the plan period, because of the likely weak state of the local housing market and economy, severe restrictions on public sector spending and also because it will be some years before work on the Local Plan is sufficiently progressed to produce a significant increase to the available land supply.</u></b></li> <li>• <b><u>An assumption that the backlog in past under provision of new homes will be resolved over the full plan period – the 'Liverpool approach'.</u></b></li> <li>• <b><u>A reflection of the addition, in line with the NPPF of an additional 20% to the 5 year land supply requirement which will ensure a wider range and choice of sites and</u></b></li> </ul>
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<p>MM152 (Continued)</p>		<p><b><u>boost delivery in the early part of the plan period:</u></b></p> <ul style="list-style-type: none"> <li>• The housing distribution strategy and settlement hierarchy set out within the Core Strategy and embedded within the Spatial Option. This envisages that delivery will be stimulated by a number of master planning initiatives which will deliver housing growth in different areas at different times. These <b><u>will result in</u></b> major injections into both the land supply and into investment and delivery. <del>will not be spread out evenly over the whole plan period, because of the work necessary to bring them to fruition, to put the necessary infrastructure in place, and to bring forward and test the relevant Development Plan Documents. The combined result of these factors means that the delivery profile within Bradford will be heavily weighted towards the middle and particularly the final phase of the plan period.</del> This will provide a major challenge to house builders as development activity rates over recent years have been substantially below the sort of levels needed to deliver the Core Strategy annual housing requirement of 2200.</li> <li>• <del>The production of a Strategic Housing Land Availability Assessment and examination of its results – although it has a significant and important role to play, the SHLAA delivery trajectory cannot be simply transplanted into the housing trajectory in this chapter. This is because the SHLAA has taken a ‘local policy off’ approach and much of the supply within it is dependent on changes to the statutory development plan. The SHLAA supply is also larger than the housing requirement. The SHLAA has however assisted production of both the policies of the Core Strategy and this appendix by providing a detailed profile of the land supply, including how it is distributed both geographically and by type – for example whether green field or previously developed, and whether deliverable in the short term or longer term. The SHLAA has therefore enabled realistic alternative options to be assessed and can shine a light on the preferred option in terms of its implications in terms of existing planning designations and the challenges of overcoming site related constraints. The SHLAA has also provided input into the creation of realistic but challenging targets for delivery on brownfield land.</del></li> <li>• <del>Scenario building table 1 (overleaf) has attempted, based on the elements above, to set out the scenarios which will show how overall housing completions and the percentage of delivery on PDL will vary across the plan period. This in turn feeds into the risk analysis at the end of this appendix.</del></li> </ul> <p><b><u>The components making up the housing trajectory chart are as follows:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Net housing completions 2004-13</u></b></li> </ul>
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			<ul style="list-style-type: none"> <li>• <b><u>Basic Policy HO1 housing target of 2,200 new homes per annum</u></b></li> <li>• <b><u>NPPF 20% buffer for years 1-5 of 440 dwellings</u></b></li> <li>• <b><u>Backlog of unmet need resolved over the 15 year plan period (7,687 dwellings in total) ‘</u></b></li> </ul>																																																																														
MM153	Page 358	Table 1: Scenarios for Delivery	Delete Table 1 in its entirety.																																																																														
MM154	Page 359-360	Table 2 & Housing Trajectory Charts	<p>Delete Table 2 and delete the 2 housing trajectory diagrams and replace with the following housing trajectory chart:</p> <p><b>Core Strategy Housing Trajectory</b> (Based On Submission Draft Plan &amp; Front Loaded Buffer Scenario)</p> <table border="1"> <caption>Estimated Data from Core Strategy Housing Trajectory Chart</caption> <thead> <tr> <th>Year</th> <th>Past Completions</th> <th>Expected Completions</th> </tr> </thead> <tbody> <tr><td>2004/5</td><td>1350</td><td>0</td></tr> <tr><td>2005/6</td><td>1350</td><td>0</td></tr> <tr><td>2006/7</td><td>1600</td><td>0</td></tr> <tr><td>2007/8</td><td>2200</td><td>0</td></tr> <tr><td>2008/9</td><td>1450</td><td>0</td></tr> <tr><td>2009/10</td><td>1000</td><td>0</td></tr> <tr><td>2010/11</td><td>700</td><td>0</td></tr> <tr><td>2011/12</td><td>700</td><td>0</td></tr> <tr><td>2012/13</td><td>700</td><td>0</td></tr> <tr><td>2013/14</td><td>0</td><td>2200</td></tr> <tr><td>2014/15</td><td>0</td><td>2200</td></tr> <tr><td>2015/16</td><td>0</td><td>3100</td></tr> <tr><td>2016/17</td><td>0</td><td>3100</td></tr> <tr><td>2017/18</td><td>0</td><td>3100</td></tr> <tr><td>2018/19</td><td>0</td><td>3100</td></tr> <tr><td>2019/20</td><td>0</td><td>3100</td></tr> <tr><td>2020/21</td><td>0</td><td>2500</td></tr> <tr><td>2021/22</td><td>0</td><td>2500</td></tr> <tr><td>2022/23</td><td>0</td><td>2500</td></tr> <tr><td>2023/24</td><td>0</td><td>2500</td></tr> <tr><td>2024/25</td><td>0</td><td>2500</td></tr> <tr><td>2025/26</td><td>0</td><td>2500</td></tr> <tr><td>2026/27</td><td>0</td><td>2500</td></tr> <tr><td>2027/28</td><td>0</td><td>2500</td></tr> <tr><td>2028/29</td><td>0</td><td>2500</td></tr> </tbody> </table>	Year	Past Completions	Expected Completions	2004/5	1350	0	2005/6	1350	0	2006/7	1600	0	2007/8	2200	0	2008/9	1450	0	2009/10	1000	0	2010/11	700	0	2011/12	700	0	2012/13	700	0	2013/14	0	2200	2014/15	0	2200	2015/16	0	3100	2016/17	0	3100	2017/18	0	3100	2018/19	0	3100	2019/20	0	3100	2020/21	0	2500	2021/22	0	2500	2022/23	0	2500	2023/24	0	2500	2024/25	0	2500	2025/26	0	2500	2026/27	0	2500	2027/28	0	2500	2028/29	0	2500
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2011/12	700	0																																																																															
2012/13	700	0																																																																															
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2015/16	0	3100																																																																															
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2017/18	0	3100																																																																															
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MM155	Page 361	Appendix 6, paragraph 1.6	<p>Amend paragraph 1.6, as follows:</p> <p>‘1.6 The Council has a program for the delivery of statutory development plan documents which will be fundamental to the delivery of the envisaged housing growth as set out above. This is because the plan making process for the <b>Local Plan LDF</b> needs to facilitate a massive step change in housing delivery which cannot be met either by the existing land supply or by the existing planning framework. Key decisions have to be made which have to be tested via extensive public engagements and by examination in public. The DPD’s involved are:</p> <ul style="list-style-type: none"> <li>• The Shipley and Canal Road Corridor DPD - The Shipley and Canal Road Corridor is located within the main urban area of Bradford between the city centre and Shipley town centre. In support of Bradford’s regeneration priorities it is one of the key locations identified to deliver housing and economic growth in the district. <b>Up to <del>3200</del> 3,100</b> new homes are planned to be located in the CRC and the area has been identified as one of four Urban Eco Settlements in the Leeds City Region. In line with the sub area policies in the Core Strategy, the AAP will set out planning policies to guide development proposals in the area, along with details of how these proposals will be delivered. Issues and Options stage consultation took place between March and May 2013 <b><u>with consultation on the Publication Draft expected to take place in the Autumn of 2015</u></b> with plan adoption expected in <b><u>late</u></b> 2016.</li> <li>• The Bradford City Centre Area Action Plan DPD - The City Centre AAP will set the vision and spatial strategy in support of the regeneration of Bradford City Centre. It will provide the statutory basis for the implementation of the City Centre Masterplan and associated four Neighborhood Development Frameworks and help deliver developments on the identified sites and in areas of change and constraint. <b>Up to</b> 3500 new homes are planned to be delivered within the City Centre during the plan period. Public consultation on the City Centre AAP Further Issues and Options took place between March and May 2013 with <b><u>Publication draft consultation expected in late 2015 and</u></b> adoption expected in <b><u>late</u></b> 2016.</li> <li>• The Allocations Development Plan Document - this DPD will cover all other areas of the district outside of the 2 area action plans and will set out the approach to housing and employment development, the green belt, and the provision for sport and formal and informal recreational and open space. It will bring forward land allocations within the majority of the Bradford urban area, within the Principal Towns of Keighley, Ilkley and Bingley, together with the local growth centres and local service centres. Issues and Options stage consultation is scheduled for late <b><u>2015 2014.</u></b>’</li> </ul>
MM155 (Continued)			

MM156	Page 365	Appendix 6, Table 3	<p>Modify the following text within the first line of the 'scenario':</p> <p><b><u>If the PDL delivery falls to levels which threaten the delivery of the targets and objectives set out within Policy HO6 consistently (for more than 3 consecutive years) and significantly below the expected levels as set out in the scenarios above and Policy HO6:</u></b></p> <ul style="list-style-type: none"> <li>• The Council will consider intervention measures to assist the delivery of PDL sites including – land assembly by assisting occupiers to find alternative sites, bringing forward Council owners land, and use of CPO powers.</li> <li>• The Council will advance previously developed sites into the 5 year supply</li> </ul>
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