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 2nd Floor South,
 Jacobs Well,
 Nelson Street,
 BRADFORD,
 BD1 5RW

Our Ref: HD/P5114/05

Your Ref:

Date: 25 March 2014

Dear Sirs,

Bradford Local Development Framework: Core Strategy: Publication Draft – Sustainability Appraisal Report

Thank you for consulting English Heritage about the above Report.

Given the strategic nature of the document, we would broadly concur with the conclusions reached regarding the likely significant effects which the Policies and proposals of the Publication Draft of the Core Strategy might have upon the historic environment. In the main, where suggested, we would endorse the recommended mitigation measures.

There are, however, a small number of areas where we consider that further thought is necessary:-

Page	Section	Comments
Non-technical summary, Page vii	Table NT2, SA Objective 7 (heritage assets)	<p>Sub-Area Policies - whilst many elements of the sub-Area Policies will have a positive impact against this SA Objective, in several areas the scale of housing proposed could result in harm to important heritage assets. Without any evaluation, it is impossible to assess whether or not the housing strategy for these sub areas is consistent with the SA Objective for the historic environment. Consequently, the effect has to be “uncertain” at this stage.</p> <p>Economy - Without any evaluation, it is impossible to assess whether or not the economic strategy is consistent with the SA Objective for the historic environment. Consequently, the effect has to be “uncertain” at this stage.</p>
Appendix D	Policy BD1, SA Objective 7 (heritage assets)	<p>At this stage, we cannot agree that Policy BD1 would be likely to “move significantly towards” SA Objective 7. Indeed, as currently drafted, we consider that there is potential for the Policy to move significantly away from this Objective.</p> <p>Shipley The proposed level of housing growth for Shipley could harm elements which contribute towards the Outstanding Universal Value of the World Heritage Site at Saltaire.</p>

Page	Section	Comments
		<p>Whilst the allocation of 1250 dwellings is 543 less than the trajectory total given in the SHLAA, 237 of the dwellings identified in the SHLAA are located in areas which the Saltaire World Heritage Site Environmental Capacity Study has identified as being important components in the setting of the World Heritage Site [see Environmental Capacity Study Figure 15 and Appendix B]. One of those sites (Site SH/037, potentially capable of accommodating 109 dwellings) is located in an area which is considered to as being critical to the Site's setting.</p> <p>Assuming that the sites which could harm the significance of the World Heritage Site are not allocated, this means that there would be 306 dwelling difference between the total amount of housing bring put forward in the Core Strategy and the total amount of housing land identified in the SHLAA.</p> <p>Whilst this margin of flexibility is probably sufficient to ensure that there will not be pressure to allocate areas which have been specifically identified in the Environmental Capacity Study as being important components of the setting of the World Heritage Site, nevertheless, a large number of the remaining sites identified in the SHLAA still lie within the World Heritage Site Buffer Zone. This may present a further constraint upon the potential amounts of housing available from the Shipley area.</p> <p><u>Suggested mitigation measure</u> In order to provide a framework for subsequent DPDs and to reduce pressure for the allocation of sites which may harm the setting of the World Heritage Site, Policy BDI should make it clear that housing sites around Saltaire will be required to safeguard its Outstanding Universal Value.</p> <p>Holme Wood The proposed urban extension at Holme Wood (as depicted in the 2012 Holme Wood & Tong Neighbourhood Development Plan Final Report) lies extremely close to the north-western edge of the Registered Battlefield at Adwalton. It could also result in harm to the setting of a number of Listed Buildings in its vicinity including the Grade II* Listed Ryecroft Hall.</p> <p>The NPPF makes it clear that Registered Battlefields and Grade II* Listed Buildings are considered by the Government to be in the category of designated heritage assets of the highest significance where substantial harm or loss should be wholly exceptional.</p> <p>However, there has been no assessment, as part of the evidence base, to evaluate what impact the development of this area might have upon those elements which contribute towards the</p>

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		<p>significance of these assets.</p> <p>In the absence of any assessment of the degree of harm which the Holm Farm development might cause to the historic environment or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the plan cannot demonstrate that the allocation of this area is compatible with its policies for the protection of Bradford's historic environment, especially the Registered Battlefield at Adwalton.</p> <p>Whilst it is recognised that this area may well be important to meet the future housing requirements of Bradford, the Plan should be seeking to ensure that can be and is developed in a manner which safeguards those elements which contribute to the significance of the designated historic assets in its vicinity.</p> <p><u>Suggested mitigation measure</u></p> <p>(1)(i) An assessment needs to be undertaken, as part of the Evidence Base to underpin Sub Area Policy BDI Criterion C.1, of the potential impact which the development of Holme Wood might have upon those elements which contribute towards the significance of the Registered Battlefield at Adwalton and other designated heritage assets in its vicinity.</p> <p>(ii) Where the proposals are considered likely to result in harm to the significance of those assets, the Plan needs to set out the measures by which it is proposed that the harm will be removed or reduced.</p> <p>(iii) If it is not possible to reduce the harm, then the Plan needs to set out why this harm is justified (in line with the guidance in NPPF, Paragraph 133 or 134).</p> <p>(2) Sub Area Policy BDI, Criterion C.1 line 6 amend to read:- <i>"... in sustainable locations, if required. Growth at Holme Wood will be delivered in a manner which safeguards the character and setting of the Registered Battlefield at Adwalton and the other designated heritage assets in its vicinity"</i>.</p>
Appendix D	Policy AD1, SA Objective 7 (heritage assets)	<p>At this stage, we cannot agree that Policy AD1 would be likely to "move significantly towards" SA Objective 7. Indeed, as currently drafted, we consider that there is potential for the Policy to move significantly away from this Objective.</p> <p>Baildon</p> <p>The proposed level of housing growth for Baildon could harm elements which contribute towards the Outstanding Universal Value of the World Heritage Site at Saltaire.</p>

Page	Section	Comments
		<p>Whilst the allocation of 450 dwellings is 433 less than the trajectory total given in the SHLAA, 444 of the dwellings identified in the SHLAA are located in areas which the Saltaire World Heritage Site Environmental Capacity Study has identified as being critical to the setting of the World Heritage Site [see Environmental Capacity Study Figure 15 and Appendix B].</p> <p>Assuming that the sites which could harm the significance of the World Heritage Site are not allocated, this means that even were every other housing site identified in the SHLAA to be allocated, there would still be insufficient identified sites to meet the housing figure for Baildon which is set out in Policy Sub Area Policy AD1.</p> <p>In addition, some 200 or so of the dwellings in the SHLAA are on sites which fall within the World Heritage Site Buffer Zone. This may present a further constraint upon the potential amounts of housing available from the Baildon area.</p> <p><u>Suggested mitigation measure</u></p> <p>(1) Sub Area Policy AD1, Criterion A reduce the number of residential units for Baildon to a level which is likely to be deliverable in a manner which would safeguard the Outstanding Universal Value of the World Heritage Site, and</p> <p>(2) Add the following to the end of that part of Policy AD1, Criterion B which deals with Baildon:- <i>“The new homes around Baildon will be delivered in a manner which will safeguard those elements which contribute to the Outstanding Universal Value of Saltaire”.</i></p>
Appendix D	Policy PNI, SA Objective 7 (heritage assets)	<p>At this stage, we cannot agree that Policy PNI would be likely to “move towards” SA Objective 7. Indeed, as currently drafted, we consider that there is potential for the Policy to move significantly away from this Objective.</p> <p>Howarth The proposed level of housing growth for Howarth could harm the character of this important settlement and its landscape setting.</p> <p>Whilst the allocation of 500 dwellings is 195 dwellings less of the trajectory total given in the SHLAA, nonetheless, one of the largest sites identified in the SHLAA as being potentially suitable for housing (which the SHLAA anticipates could accommodate 112 dwellings) appears poorly related to the form and setting of the village and another of the sites (capable of providing some 38 dwellings) lies within an area identified in the Howarth Conservation Area Assessment as being a Key Open Space.</p>

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		<p>Assuming that the sites which could harm the setting of the village and the character of its Conservation Area are not allocated, this means that even were every other housing site identified in the SHLAA to be allocated, there would only be a margin of flexibility of 45 dwellings between the total amount of housing which could potentially come forward in the SHLAA and the total for Haworth which is set out in Policy Sub Area Policy PNI.</p> <p>In addition, two sites identified in the SHLAA lie within the Haworth Conservation Area. Whilst not on sites specifically identified in the Conservation Area Appraisal as being Key Open Spaces, nonetheless, one includes a Grade II Listed Building and the other a group of trees which the Conservation Area Appraisal has identified as being important. This may present a further constraint upon the potential amounts of housing available from the Haworth area.</p> <p>The margin of flexibility between the total amount of housing identified in the SHLAA and the figure given for Haworth in Policy PNI does not appear to be sufficient to have confidence that the level of housing proposed can be delivered in a manner which is consistent with the Plan's Policies for the conservation of the historic environment.</p> <p><u>Suggested mitigation measure</u></p> <p>(1) Sub Area Policy PNI, Criterion A reduce the number of residential units for Haworth to a level which is likely to be deliverable in a manner which would safeguard the Outstanding Universal Value of the World Heritage Site, and</p> <p>(2) Policy PNI, Criterion B second Paragraph, line 3 amend to read :- <i>"... with some local Green Belt change. The new homes in and around Haworth will be delivered in a manner which will safeguard those elements which contribute to the landscape setting of the village and the character of its Conservation Area".</i></p>

This opinion is based on the information provided by you with your e-mail dated 12th February, 2014. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the SPD) where we consider that, despite the SA/SEA, these would have an adverse effect upon the historic environment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,

 Smith