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 Jacobs Well,  
 Nelson Street,  
 BRADFORD,  
 BD1 5RW

Our Ref: HD/P5114/04

Your Ref:

Date: 25 March 2014

Dear Sirs,

**Bradford Local Development Framework: Core Strategy: Publication Draft**

Thank you for consulting English Heritage about the latest iteration of the Core Strategy. We have the following comments to make regarding its contents:-

Page	Section	Sound/ Unsound	Comments	Suggested Change
21	Paragraphs 2.63 to 2.65	Sound	This Section provides a good general introduction to the wealth of heritage assets within Bradford, some of the challenges that these face, and the important contribution that they make to the character of the area, to the quality of life of its communities, and to the economic well-being of the District.	-
22	Paragraphs 2.66 to 2.67	Sound	This Section provides a good summary of cultural and tourist attractions of the Plan area. We would endorse the acknowledgement that the tourism industry is underachieving and of the need to lift the appeal and quality of some of its attractions.	-
24	Paragraph 3.3 Vision	Sound	We support the proposed Vision for Bradford District in 2030 particularly the intention that the District's unique landscapes and heritage will have played a vital role in making places that encapsulate what makes Bradford so special.	-

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			This reflects the intention within the Community Strategy that the built heritage of Bradford should be protected and nurtured.	
25	Paragraph 3.9	Sound	<p>We welcome the proposals outlined in this Paragraph particularly:-</p> <ul style="list-style-type: none"> <li>• The intention to protect and enhance the unique diverse landscapes and heritage of the District.</li> <li>• The intention that the landscapes and heritage of the District will play a key part in Bradford's transformation as a place where people want to live, work and visit.</li> <li>• The recognition that the built heritage is key to the District's identity and distinctive sense of place.</li> <li>• The intention to ensure that new developments continue to maintain the District's identity and sense of place.</li> </ul>	-
25	Paragraph 3.10	Sound	<p>We welcome the initiatives set out in this Paragraph particularly the intention that:-</p> <ul style="list-style-type: none"> <li>• Saltaire, Ilkley and Haworth will have been strengthened as tourist destinations and that their distinctive character will have been protected and enhanced.</li> <li>• The heritage assets of Little Germany and Goitside will have contributed to Bradford City Centre becoming a major visitor and tourist destination.</li> </ul>	-
27	Paragraph 3.15,	Unsound	Tourism makes an important contribution to the economy of	Paragraph 3.15, Strategic Objective 6

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	Strategic Objective 6		the District. However, as Paragraph 2.67 notes, this sector of the economy is underachieving. The Strategic Objective for the economy should also include specific reference to the intention to realise the full potential which tourism can make to the economy of the District.	add the following to the end of the current Objective:-  <i>"... and by maximising the contribution which its tourist assets can make to the economy of the area".</i>
28	Paragraph 3.15, Strategic Objective 12	Sound	We support this Objective. This will assist in the delivery of the Core Strategy Vision that the District's heritage will have played a vital role in making places that encapsulate what makes Bradford so special.	-
31	Strategic Core Policy I (SC1), Criterion B.7	Sound	We support the requirement that plans, programmes and other strategies should protect and enhance the District's environmental resources including its heritage assets and the intention to maximise the contribution that these assets can make towards the delivery of wider social and economic objectives.  This will assist in the delivery of the Vision that the District's unique landscapes and heritage will have played a vital role in making places that encapsulate what makes Bradford so special.	-
31	Strategic Core Policy I (SC1), Criterion B.11	Sound	We support the requirement that plans, programmes and other strategies should ensure that developments are of a high quality, that they protect and enhance local settings and heritage, and help to reinforce or create a sense of local character and distinctiveness.	-

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			This will assist in the delivery of that part of the Core Strategy Vision relating to making great places that encapsulate what makes Bradford so special.	
32	Paragraph 3.22	Sound	We would endorse the recognition that a good quality environment is critical to the social, economic and environmental well-being of the District and that positive environmental management will be vital if it is to be safeguard and improved.	-
33	Paragraph 3.28	Sound	<p>We welcome the recognition of the need to protect and enhance the character and qualities of the District's public parks and its countryside. Several of these areas are either designated heritage assets in their own right or contribute to the setting of its historic buildings and structures.</p> <p>The protection and effective management of this resource will not only help to safeguard many elements which contribute to the distinctive character of Bradford but also to deliver the plan's Objectives for its historic environment.</p>	-
41	Strategic Core Policy 4 (SC4), Regional City, Criterion B.2	Sound	<p>We welcome the requirement that proposals for development in the Regional City of Bradford should develop a strong sense of place which reinforces the distinct local identity of the area with a high-quality public realm and well-designed buildings.</p> <p>This will assist in the delivery of</p>	-

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			the Vision and its related Objectives relating to making great places that encapsulate what makes Bradford so special.	
42	Strategic Core Policy 4 (SC4), Principal Towns, Criterion C	Sound	<p>We welcome the acknowledgement that the character and setting of these settlements is defined by their biodiversity, landscape and heritage assets and the requirement that, in identifying their potential for growth, this will be informed by the existing scale of the settlement and the contribution made by, and importance of, its environmental assets.</p> <p>This will assist in the delivery of the Vision and its related Objectives relating to making great places that encapsulate what makes Bradford so special and the conservation of the District's heritage assets.</p>	-
42	Strategic Core Policy 4 (SC4), Local Growth Centres, Criterion B	Unsound	<p>The Vision and Objectives recognise the need for the plan to safeguard and reinforce those elements which contribute to the distinct character of Bradford's communities.</p> <p>In the case of Local Growth Centres, Paragraph 3.73 sets out an intention that growth and change within these settlements should not detract from their character and distinctiveness. It identifies particular aspects of these settlements that should be protected wherever possible including their valued open spaces, together with their historic</p>	<p>Policy SC4, Local Growth Centres insert an additional Criterion to the requirements on planning decisions which are set out under Criterion B along the following lines:-</p> <p><i>“Achieve a high standard of design that reinforces the distinct identity of these settlements and safeguards their character and</i></p>

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			<p>buildings and their settings.</p> <p>However, this requirement is not included within this part of Policy SC4.</p>	<i>landscape setting</i>
43	Strategic Core Policy 4 (SC4), Local Service Centres and Rural Areas	Sound	<p>We support the intention that, in these settlements, the emphasis will be on smaller-scale developments which meet local needs together with the protection and enhancement of those centres as attractive, vibrant places which provide quality of place and excellent environmental conditions.</p> <p>We also support the requirement, in Criterion 1, that proposals for development within these settlements should achieve a high standard of design that protects and enhances settlement and landscape diversity and character.</p> <p>This will assist in the delivery of the Vision and its related Objectives relating to making great places that encapsulate what makes Bradford so special and the conservation of the District's heritage assets.</p>	-
45	Paragraph 3.65, line 4	Unsound	<p>The use of the term "<i>unwelcome</i>" could, possibly, be used to justify removal of buildings which contributed to the character of the District but were "<i>unwelcome</i>" to that particular applicant simply because they prevented them achieving what they wanted to do to the building.</p> <p>In addition, the statement about these older buildings being unable</p>	<p>Paragraph 3.65 line 4 amend to read:-</p> <p><i>"... there are many less attractive housing areas and industrial buildings which do not contribute to the distinctive character of the District and which are difficult to adapt to modern needs"</i></p>

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			<p>to be adapted to modern needs is somewhat sweeping. Many of these buildings can be adapted but it might be more challenging than simply demolishing them and redeveloping the site.</p> <p>Consequently, it might be preferable to reword this part of the Paragraph</p>	
45	Paragraph 3.66	Sound	We support the recognition that greater emphasis needs to be placed on the design and management of the public realm. A high-quality public realm is an essential component in creating attractive successful places.	
47	Paragraph 3.70	Sound	We would endorse the need for development within the three Principal Towns to ensure that their distinctive character is protected and enhanced.	-
47	Paragraph 3.73	Sound	We would endorse the need for development within the Local Growth Centres to ensure that their distinctive character is retained. This requirement also needs to be reflected in the respective section of Policy SC4.	-
48	Paragraph 3.78	Sound	We would endorse the need for development within the Local Service Centres and rural areas to ensure that their distinctive character is retained. This is especially important in places such as Haworth whose economic welfare relies on safeguarding those elements which contribute towards its distinctive identity.	-
49	Strategic Core Policy 5 (SC5),	Unsound	In identifying sites as allocations, we fully support the principal of priority being given to those sites which would reuse previous	Policy SC5, Criterion A.1, line 1 amend to read:-

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	Criterion A.1, Line 2		<p>buildings. Given the embodied energy within existing buildings (in terms of the materials used for their construction, the energy that was involved in moving those materials to the site etc) coupled with the energy which would be expended in the demolition of those buildings and the removal of the waste materials, we welcome the intention to encourage the reuse of existing buildings.</p> <p>However, the additional text which has been added to this Criterion since the last iteration of the Core Strategy could, potentially, be interpreted as implying that the reuse of buildings of <i>"high environmental value"</i> is not something which the plan would encourage. As a result, this would mean the Plan would not be encouraging the reuse or adaptation of the District's Listed Buildings (because they are of <i>"high environmental value"</i>). Clearly, such an approach would not accord with the principles set out in the NPPF.</p> <p>In order to avoid any confusion, this Criterion would benefit from a slight amendment to improve its clarity.</p>	<i>"First priority to the re-use of existing buildings and of deliverable previously-developed land provided that it is not of high environmental value ..."</i>
52	Paragraph 3.91	Sound	We support the recognition of the linkages between the District's heritage assets and its Green Infrastructure network. Several elements of Bradford's Green Infrastructure network are either designated heritage assets in their own right or contribute to the	-



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			setting of its historic buildings and structures. The protection and effective management of this resource will not only help to safeguard many elements which contribute to the distinctive character of Bradford but also to deliver the plan's Objectives for its historic environment.	
53	Strategic Core Policy 6 (SC6)	Sound	We support this Policy which should help to safeguard the Green Infrastructure of the District. Several elements of Bradford's Green Infrastructure network are either designated heritage assets in their own right or contribute to the setting of its historic buildings and structures. The protection and effective management of this resource will not only help to safeguard many elements which contribute to the distinctive character of Bradford but also to deliver the plan's Objectives for its historic environment.	-
55	Fig. SS3	Sound	We support the opportunities to improve the Green Infrastructure associated with:- <ul style="list-style-type: none"> <li>• Bradford City Centre and the enhancement of the quality of its public realm</li> <li>• The Leeds Liverpool Canal Corridor, especially the enhancement of the contribution this area makes to heritage and environmental quality within Bradford</li> <li>• Regeneration programmes in the urban core of the Regional City and in Keighley to achieve improvements in their environmental quality.</li> </ul>	-

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			The protection and effective management of the Green Infrastructure within these areas will not only help to safeguard many elements which contribute to the distinctive character of Bradford but also to deliver the plan's Objectives for its historic environment.	
57	Strategic Core Policy 7 (SC7), Criterion C	Unsound	<p>This Criterion does not reflect the advice in Paragraph 83 of the NPPF. This makes it clear that one of the essential characteristics of a Green Belt is its permanence in the long term and that a Green Belt should be capable of enduring beyond the plan period.</p> <p>Assuming the Core Strategy is adopted in 2015, with an end-date of 2030, this gives the Green Belt a permanence which is only as long as the timescale of this DPD.</p>	Policy SC7, either:- (a) Delete Criterion C, or (b) Specify an end-date beyond 2030
63	Strategic Core Policy 9 (SC9)	Sound	<p>We support this Policy which should help to ensure that those elements which contribute to the distinctive local character of the various areas of the District are retained and reinforced. We particularly welcome the requirement that proposals should:-</p> <ul style="list-style-type: none"> <li>• Understand the place and its wider context</li> <li>• Respond to the District's distinctive features and character and be appropriate to the local context, and</li> <li>• Create a strong sense of place through the design of buildings, streets and spaces.</li> </ul>	-

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			This will assist in the delivery of the Vision and its related Objectives relating to making great places that encapsulate what makes Bradford so special and the conservation of the District's heritage assets.	
72	Sub Area Policy BDI, Criterion A, Shipley	Unsound	<p>We have concerns about the potential impact which the proposed level of housing growth for Shipley might have upon elements which contribute towards the Outstanding Universal Value of the World Heritage Site at Saltaire.</p> <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 <i>Saltaire World Heritage Site Environmental Capacity Study</i> has identified as being important components in the setting of the World Heritage Site [see <i>Environmental Capacity Study</i> 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</p>	<p>Add the following to the end Policy BDI, Criterion B.2:-</p> <p><i>"The new homes around Shipley will be delivered in a manner which will safeguard those elements which contribute to the Outstanding Universal Value of Saltaire".</i></p>

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			<p>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 <i>Environmental Capacity Study</i> 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>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 BD I should make it clear that housing sites around Saltaire will be required to safeguard its Outstanding Universal Value.</p>	
72	Sub Area Policy BD I, Criterion B.I.	Sound	<p>As part of the regeneration and renewal priorities for Bradford City Centre, we welcome the intention to:-</p> <ul style="list-style-type: none"> <li>• Deliver new homes in the Regional City through the reuse of existing buildings,</li> <li>• Create a high-quality public realm linked to the City Park, and other open spaces, and</li> <li>• Support effective management and enhancement of the historic environment.</li> </ul>	-

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			These measures will help to safeguard and provide an appropriate setting for its rich legacy of heritage assets, and improve the character and appearance of the City's historic core.	
73	Sub Area Policy BDI, Criterion B.3.	Unsound	<p>Manningham, which is considered to be Bradford's premier Victorian suburb, has three of its Conservation Areas on the 2012 <i>"Heritage at Risk Register"</i>.</p> <p>Given the significance of this area, the strategy should also be using conservation-led regeneration as a means of reinvigorating this part of the City.</p>	<p>Amend the end of Policy BDI, Criterion B.3. along the following lines:-</p> <p><i>"... via the creation of new housing and economic growth, heritage-led regeneration, and community infrastructure"</i>.</p>
73	Sub Area Policy BDI, Criterion C.1.	Unsound	<p>The proposed urban extension at Holme Wood (as depicted in the <i>2012 Holme Wood &amp; Tong Neighbourhood Development Plan Final Report</i>) 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</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</p>

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			<p>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 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. Moreover, the Plan also fails to demonstrate that, as a whole, it is setting out a "positive strategy for the conservation and enjoyment of the historic environment" as is required by Paragraph 126 of the NPPF.</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>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 BD1, Criterion C.1 line 6 amend to read:-</p> <p><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>
74	Sub Area Policy BD1, Criterion	Unsound	Whilst we broadly welcome the proposals for Saltaire which are set out in this Criterion, it should	(a) Delete Policy BD1, Criterion D.5 and replace with:-

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	D.5.		be more explicit about fully-utilising the potential of the World Heritage Site to contribute to the future economic well-being of the District reflecting more closely what is outlined in Paragraph 4.1.10.	<i>“Exploit the full potential which Saltaire can make to the District’s economic well-being by encouraging appropriate leisure and tourism-led mixed use developments, enhancements of the public realm, improved links between the World Heritage Site and with other tourist attractions in the Airedale corridor whilst ensuring that the outstanding universal value of the World Heritage Site is safeguarded for present and future generations”</i>
74	Sub Area Policy BD1, Criterion E.5.	Unsound	Whilst we fully support the intentions behind this Criterion, it is somewhat generic and would benefit from identifying slightly more specifically which particular aspects of the heritage are of especial importance in this part of the District. It is particularly important to include reference to the Registered Battlefield at Adwalton Moor. As the NPPF makes clear, Registered Battlefields are included within the group of designated heritage assets which the Government considers to be of the highest significance where loss or substantial harm should be wholly exceptional. However, despite	Amend Policy 1 (BD1) Criterion E.5 to read:-  <i>“Conserve and enhance the area’s heritage assets especially those in the City Centre, Little Germany, Goitside and Manningham and the Registered Battlefield at Adwalton”.</i>

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			Adwalton being only one of seven Registered Battlefields in Yorkshire, it is not referred to anywhere within the plan's Policies and, potentially, could be affected by the development at Holme Farm.	
76	Figure BDI	Sound	We welcome the intentions that are set out for Saltaire in this diagram	-
77	Paragraph 4.1.2	Unsound	<p>The proposed urban extension at Holme Wood (as depicted in the <i>2012 Holme Wood &amp; Tong Neighbourhood Development Plan Final Report</i>) 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>We have set out, above, our concerns regarding the impact which this development might have upon these assets and the measures which we consider necessary to ensure that this development does not harm the significance of the designated site.</p> <p>One of the Outcomes for the Holme Wood development should be that it has been developed in a manner which has safeguarded those elements which contribute to the significance of the Registered Battlefield and the other heritage assets in its vicinity.</p>	<p>Paragraph 4.1.2 line 5 amend to read:-</p> <p><i>"The urban extension to Holme Wood, whilst safeguarding the setting of the nearby Registered Battlefield at Adwalton and other heritage assets nearby, has allowed for the creation of a sustainable etc..."</i></p>
77	Paragraph 4.1.3 to 4.1.6	Unsound	The City centre has a rich legacy of historic buildings which make a significant contribution to its	Add the following additional Paragraph after Paragraph 4.1.6:-



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			distinct identity. However, in many areas, these buildings are vacant or underused and, as a result, not only detract from the character of their surrounding area, but also are not contributing effectively to the District's economy. By 2030, the intention should be that heritage-led regeneration initiatives have secured a sustainable future for the historic buildings in the area and the reuse and adaptation of these buildings has contributed towards meeting the needs for offices and new homes in the City Centre. This would also better reflect the priority given to the reuse and adaptation of existing buildings that is set out in Strategic Policy 5, Criterion 1 and Policy BDI Criterion B.1.	<i>Heritage-led regeneration initiatives have secured a sustainable future for the historic buildings of the City Centre, especially in Little Germany and Goitside, and the reuse of these buildings has contributed towards meeting the needs for offices and new homes in the City Centre".</i>
78	Paragraph 4.1.10	Sound	We support the proposed outcomes for Saltaire by 2030	-
79	Sub Area Policy BD2, Criterion B.	Sound	We welcome the intention to target public and private sector investment in this area to support the regeneration of Bradford City Centre, to deliver enhancements to the public realm, and to maximise the potential of the area's heritage assets.	-
82	Sub Area Policy ADI, Criterion A, Baildon	Unsound	We have concerns about the potential impact which the proposed level of housing growth for Baildon might have upon elements which contribute towards the Outstanding Universal Value of the World Heritage Site at Saltaire.  Whilst the allocation of 450	(1) Sub Area Policy ADI, 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

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			<p> 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 <i>Saltaire World Heritage Site Environmental Capacity Study</i> has identified as being critical to the setting of the World Heritage Site [see <i>Environmental Capacity Study</i> 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> Consequently, it is considered that the Plan is unsound because it cannot demonstrate that the proposed housing figure for the Baildon is deliverable in a manner which would safeguard those elements which contribute to the Outstanding Universal Value of the Saltaire World Heritage Site.</p>	<p> 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:-</p> <p> <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>
82	Sub Area	Sound	We welcome the proposal for	-

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	Policy ADI, Criterion B, Keighley		heritage-led enhancements within Keighley focussed on historic buildings such as Dalton Mills.	
83	Sub Area Policy ADI, Criterion C.	Unsound	<p>Tourism is recognised as making an important contribution to the economy of the District. However, as Paragraph 2.67 notes, this sector of the economy is underachieving. The heritage tourist attractions along the Airedale corridor could play a greater role in contributing to the tourism economy of the District. However, this potential is not being realised.</p> <p>The international popularity of Haworth as a tourist destination and the other heritage tourist attractions along the Airedale corridor (Saltaire, East Riddlesden Hall, Cliffe Castle and the prehistoric landscapes of Baildon Moor) should be better exploited in order to deliver economic benefits to the District. Such a strategy would complement the heritage-led proposals which are being put forward elsewhere in the Policy and in Paragraph 4.2.2.</p>	<p>Policy ADI, Criterion C add an additional Criterion along the following lines:-</p> <p><i>“Support initiatives which would promote and improve connectivity and linkages between Haworth and the other heritage tourist attractions along the Airedale corridor”</i></p>
83	Sub Area Policy ADI, Criterion D.4.	Sound	We support the intention to protect and enhance the heritage of the river, beck and canal corridors	
84	Sub Area Policy ADI, Criterion E.6.	Unsound	Whilst we fully support the intentions behind this Criterion, it is somewhat generic and would benefit from identifying slightly more specifically which particular aspects of the heritage are of especial importance in this part of	<p>Amend Policy ADI Criterion E.5 to read:-</p> <p><i>“Conserve and enhance the heritage assets of the Airedale Corridor especially</i></p>

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			the District.	<i>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, the buildings and structures associated with the Leeds and Liverpool Canal, and the prehistoric landscapes and rock art of Rombald's Moor".</i>
85	Figure AD1	Sound	We welcome the intention to enhance the heritage and industrial archaeological value of the towns along the Airedale corridor.	
86	Paragraph 4.2.2	Sound	We support the various heritage-led regeneration proposals for Keighley which are set out in this Paragraph.	-
86	Paragraph 4.2.3	Sound	We welcome the intention to better exploit the tourism and recreational potential of the heritage assets along the Leeds and Liverpool Canal	-
87	Sub Area Policy AD2, Criterion B	Sound	We welcome the intention to target public and private sector investment to support the regeneration of Keighley and Bingley town centres and to deliver enhancements to their public realm.	-
87	Sub Area Policy AD2	Unsound	As part of the targeted public and private sector investment measures reference should also be made to the intention to support initiatives which would promote and improve the linkages and connectivity of the heritage tourist	Airedale Sub Area Policy AD2 add the following additional Criterion:-  <i>"To deliver measures which would help to</i>

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			assets along the Airedale corridor	<i>promote and improve connectivity and linkages between Haworth and the other heritage assets along the Airedale corridor”.</i>
91	Sub Area Policy WDI, Criterion D.1	Sound	We support the recognition of the significance of the archaeology of Rombald’s Moor and the contribution which this area makes to the setting and visitor appeal of Ilkley	-
91	Sub Area Policy WDI, Criterion D5.	Unsound	Whilst we fully support the intentions behind this Criterion, it is somewhat generic and would benefit from identifying slightly more specifically which particular aspects of the heritage are of especial importance in this part of the District.	Amend Sub Area Policy WDI Criterion E.5 to read:-  <i>“Conserve and enhance the heritage assets 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”. ”.</i>
92	Figure WDI	Sound	We support the intention to enhance the heritage value of the towns and villages along the Wharfedale Corridor as one of the key elements of the Spatial Vision for this part of the District.	-
94	Sub Area Policy WD2, Criterion B	Sound	We support the proposals for the enhancements to the public realm of Ilkley.	-

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96	Sub Area Policy PNI, Criterion A, Howarth	Unsound	<p>We have concerns about the potential impact which the proposed level of housing growth for Haworth might have upon the character and landscape setting of this important settlement.</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 Haworth Conservation Area Assessment as being a Key Open Space.</p> <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</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 character and landscape setting of the settlement, and</p> <p>(2) Policy PNI, Criterion B second Paragraph, line 3 amend to read:-</p> <p><i>“... with some local Green Belt changes. 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>

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			<p>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>Consequently, it is considered that the Plan is unsound because it cannot demonstrate that the proposed housing figure for Haworth is deliverable in a manner which would safeguard the landscape setting of Haworth and the character of its Conservation Area.</p>	
97	Sub Area Policy PNI, Criterion C.3	Unsound	<p>We support the promotion of sustainable tourism that respects the Bronte heritage of Haworth and Thornton and the importance of the Keighley and Worth Valley Railway</p> <p>However, this should be expanded to try to ensure that that the</p>	<p>Add to the end of Sub Area Policy PNI, Criterion C.3:-</p> <p><i>“... and support initiatives which would help to better promote and improve connectivity and</i></p>

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			economic benefits of the tourist industry at Haworth are spread across the remainder of the heritage tourist attractions along the Airedale corridor.	<i>linkages between Haworth and the other heritage assets along the Airedale corridor</i>
97	Sub Area Policy PNI, Criterion E.1	Sound	The moorland around Haworth, especially the areas to the west of the settlement, makes a significant contribution to the character and landscape setting of the town and to the visitor experience. Consequently we welcome the intention to safeguard this area and the cultural associations with the Brontes.	-
97	Sub Area Policy PNI, Criterion E.2	Sound	The open skylines and wilderness of the South Pennine Moors make a significant contribution to the visitor experience of the Haworth area. Consequently we welcome the intention to safeguard this aspect of the character of the area.	-
97	Sub Area Policy PNI, Criterion E.3	Sound	The historic network of lanes and footpaths are an important component of the visitor experience to this part of the District. Consequently we welcome the recognition of their value and the encouragement of their use.	-
97	Sub Area Policy PNI, Criterion E.4.	Unsound	Whilst we fully support the intentions behind this Criterion, it is somewhat generic and would benefit from identifying slightly more specifically which particular aspects of the heritage are of especial importance in this part of the District.	Amend Policy PNI Criterion E.5 to read:-  <i>“Conserve and enhance the heritage assets of the Pennine towns and villages especially those elements which make a significant contribution to the distinct character of</i>



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				<i>this area including: the mills, chimneys and associated housing of its textile heritage; and the buildings and landscapes associated with the Brontës”</i>
97	Sub Area Policy PNI, Criterion E.5	Sound	The moorland around the settlements in this part of the District makes a significant contribution to their character and landscape setting and to the significance of many heritage assets in this area. Consequently we welcome the requirement that any development in this landscape must be sensitively managed.	-
98	Figure PNI	Sound	We support the identification of the protection and enhancement of the landscape of the Pennine Upland and the development of the tourism and leisure destination role of Haworth and Thornton as two of the key elements of the Spatial Vision for this part of the District.	-
99	Paragraph 4.4.3	Unsound	<p>We welcome the intention that, by 2030, Haworth will continue to function as a widely recognised asset to the District.</p> <p>However, by the end of the plan period not only should the Bronte brand have resulted in a more buoyant and successful Haworth, but that, as part of the group of heritage tourist attractions along the Airedale corridor, it should also have also helped to increase visitor numbers to the District as a whole and, thereby, assisted the contribution which tourism can make to the regeneration of</p>	<p>Paragraph 4.4.3 line 10 amend to read:-</p> <p><i>“... and television productions. The success of Haworth has also helped to increase the numbers of visitors to the other heritage assets along the Airedale corridor. Housing development ..etc”</i></p>

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			Bradford.	
99	Paragraph 4.4.3	Unsound	Whilst we broadly support the need for Haworth to meet the housing needs of the area, this has to be achieved in a manner which safeguards the distinctive character of the town and, just as importantly, its landscape setting.	Paragraph 4.4.3 add to the end:-  <i>"... in a manner which has safeguarded its distinctive character and its landscape setting"</i>
99	Paragraph 4.4.4	Sound	We welcome the intention that, by 2030, Thornton will have continued to exploit its tourism and leisure potential linked to Haworth and Bronte country.	-
99	Paragraph 4.4.5	Sound	We welcome the intention that, by 2030, the villages of Oakworth, Oxenhope, Wilsden and Cullingworth will have retained their individual character and sense of place. All of these have historic cores which have been designated as Conservation Areas.	-
100	Sub Area Policy PN2, Criterion B	Sound	We welcome the intention that investment should focus on supporting developments which are of a scale appropriate to the settlement, that involve re-using existing buildings, and which provide sensitive enhancement of heritage assets or the public realm.	-
100	Sub Area Policy PN2, Criterion E	Sound	We welcome the intention that investment should show respect for and enhancement of the moorland setting, character and integrity of the traditional gritstone buildings and features, routes and viewpoints associated with the Brontes, the early stages of agriculture, and the development of the textile industry.	-
104	Paragraph	Sound	One of the key requirements in	-

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	5.1.1, line 7		<p>creating conditions which will attract inward investment is a high-quality environment. This not only applies to the specific locations to which employment development will be encouraged to locate but also, more widely, in terms of the overall character and appearance of the District's towns, villages and countryside.</p> <p>Consequently, we support the recognition of this fact within this introductory Paragraph to the Section on the Economy.</p>	
106	Policy EC1, Criterion F	Sound	We support the intention to encourage economic enterprises which develop or enhance the viability of the tourism and cultural sector.	-
106	Policy EC1, Criterion J	Sound	We support the intention to encourage economic enterprises which develop or enhance the viability of the tourism sector.	-
106	Policy EC1, Criterion K	Sound	We support the recognition of the potential of the District's environmental assets.	-
140	Policy TR4	Sound	<p>We support this Policy which seeks to improve access by sustainable modes of transport to the main tourist destinations of the District. We particularly endorse:-</p> <ul style="list-style-type: none"> <li>• Criterion A which seeks to ensure that areas of tourist, cultural and heritage significance are not adversely affected by the impact of transport</li> <li>• Criterion D which supports the maintenance and development of "transport-based" leisure attractions and</li> </ul>	-

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			the intention to protect opportunities for the development of such facilities.	
153	Figure HO1, Principle 2	Sound	We welcome the Plans intention of prioritising, wherever possible, the re-use of previously developed land and buildings.	-
164	Paragraph 5.3.45	Sound	<p>We support the intention that, as far as is possible and practicable, a general principle that the distribution of development will assist the retention and conservations of the District's environmental assets.</p> <p>This will assist in the delivery of the Vision that the District's unique landscapes and heritage will have played a vital role in making places that encapsulate what makes Bradford so special.</p>	-
171	Policy HO3	Unsound	<p>We have set out in our response to Sub Area Policy ADI (in respect of Baildon), Sub Area Policy PNI A (in respect of Haworth) and Sub Area Policy BDI (in respect of Holme Wood) our concerns about the levels of housing growth proposed in these areas and the potential impact which this might have upon the historic environment.</p> <p>At present, the plan fails to demonstrate that the scale of housing proposed for these areas is consistent with its Policies for safeguarding the significance of its heritage assets or with the requirements set out in NPPF Paragraph 126 to set out a positive strategy for the conservation of the historic</p>	We have set out in our responses to the respective Policies the changes that need to be made to the Plan in order to address our concerns.

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			environment.	
175	Policy HO5, Criterion C	Sound	We welcome the need for densities to take account of their surroundings and those areas where local character would warrant lower densities. This will ensure that the densities of new residential developments reflect the character of the area in which they are located.	-
178	Policy HO6, Criterion A	Sound	We support the intention to give priority to development which will involve the re-use of previously developed land and buildings.	
181	Policy HO7 Criterion G.4	Sound	We support the requirement that potential housing sites should relate well to the settlement's form and landscape setting. This will assist in safeguarding the distinctive character of the towns and villages in the plan area.	
203	Policy HO12, Criterion C, fourth bullet-point	Sound	We support the requirement that proposals for sites for gypsy and travellers should avoid significant adverse effects upon the environment.	-
211	Policy EN1	Sound	<p>We support this Policy. Several of the District's open spaces are either designated as heritage assets in their own right or contribute to the character or setting of Bradford's historic buildings, structures or areas.</p> <p>We particularly welcome:-</p> <ul style="list-style-type: none"> <li>• Criterion C.3 - Where there are open spaces in the vicinity of development sites, then, instead of automatically requiring the provision of open space on the development itself, there may well be wider public benefits through the</li> </ul>	-

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			<p>enhancement/restoration of existing open spaces. This is particularly the case where there is clear evidence that an existing open space is likely to be regularly used by the occupants of a new development.</p> <ul style="list-style-type: none"> <li>• Criterion D where the Council will work with local communities to identify areas of Local Green Space and the protection that this Criterion provides for these spaces.</li> </ul> <p>The protection and enhancement of these areas will contribute to the delivery of that aspect of the Vision which relates to the creation of an attractive District and the protection and enhancement of its environmental assets.</p>	
223	Paragraph 5.3.65 to 5.3.67	Sound	Subject to the changes set out below, we support this Section which sets out a good outline of the considerable wealth of heritage assets of the District, the contribution which they make towards the distinctive character of Bradford, to its economic well-being, and to the quality of life of its communities, together with some of the challenges these assets are likely to face in the future.	-
224	Paragraph 5.4.66, line 4	Unsound	Rather than referring to unauthorised changes, it might be preferable to, instead,	<p>Paragraph 5.4.66, line 4 amend to read:-</p> <p><i>“however, harm to the significance of heritage assets can also occur through neglect, lack</i></p>

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				<i>of maintenance or small incremental changes which can, over time erode the character of these assets”.</i>
224	Paragraph 5.4.67, line 4	Unsound	The wording of this Paragraph implies that the conservation and enjoyment of the historic environment is something which is separate to that of achieving sustainable development. The NPPF makes it clear that protecting and enhancing the historic environment is part environmental dimension of sustainable development and has to be sought jointly and simultaneously with economic and social gains.	Paragraph 5.4.67, line 4 amend to read:-  <i>“... strategy for the historic environment since protecting and enhancing the historic environment is one of the Government’s Core objectives in the promotion of sustainable development”</i>
224	Policy EN3	Sound	Given the number of heritage assets and the importance of Bradford’s historic environment, it is essential that the Core Strategy sets out a robust framework for the conservation and management of this resource.  This Policy will help to deliver that aspect of the Vision which relates to maintaining Bradford’s unique sense of place and Objective 12 regarding the protection and enhancement of the distinctive historic features of the District.  It also helps to meet the requirement in the NPPF that Local Plans should set out <i>“a positive strategy for the conservation and enjoyment of the historic environment”</i>	-

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			However, whilst we warmly welcome the inclusion of this Policy for the historic environment, it would benefit from the amendment, set out below, in order to clarify the approach to development proposals affecting archaeological remains.	
224	Policy EN3	Unsound	<p>Once this plan is adopted, Policy EN3 will be the only one against which proposals affecting the historic environment will be assessed. With the consequential replacement of the RUDP Policies by Policy EN3, there will be no policy framework in the Local Plan (or for that matter in the NPPF) about the approach which will be taken to applications affecting non-designated archaeological remains.</p> <p>In order to provide a clear indication of how a decision maker should react to a development proposals affecting non-designated archaeology, the Local Plan needs to set out the approach which the Council will adopt when considering such proposals.</p> <p>This will require an additional Criterion to Policy EN3 and some consequential amendments to the justification.</p>	<p>(1) Policy EN3, add the following additional Criterion to the Policy:-</p> <p><i>“1. Development which would result in harm to elements which contribute to the significance of a Scheduled Monument or other nationally-important archaeological site will be permitted only where this harm is outweighed by the public benefits of the proposal. Proposals affecting archaeological sites of less than national importance should conserve those elements which contribute to their significance in line with the importance of the remains. In those cases where development affecting such sites is acceptable in principle, mitigation of damage will be ensured through preservation</i></p>



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				<p><i>of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before or during development"</i></p> <p>(2) Paragraph 5.4.76 add to the end:-  <i>"The approach to non-designated archaeological remains is set out in Criterion 1".</i></p>
225	Policy EN3, Criterion D	Typographic error	This should read:- <i>"use of a Listed Building <u>should be retained</u>"</i>	Amend accordingly
225	Policy EN3, Criterion E	Typographic error	This should read:- <i>"The alteration, extension..""</i>	Amend accordingly
226	Outcomes	Unsound	<p>In view of the requirement in Paragraph 126 of the NPPF that plans should set out a positive strategy for the historic environment including heritage assets most at risk, there should be an Outcome relating to an intention to secure a reduction in the numbers of heritage assets at risk from neglect or decay.</p> <p>This would also provide a rationale for the inclusion of Indicators monitoring the numbers of assets at risk.</p>	<p>Inset an additional Outcome along the following lines:-</p> <p><i>"Overall reduction in the number of designated heritage assets at risk from neglect or decay"</i></p>
226	Indicators	Unsound	It would be preferable if this Plan used the English Heritage annual <i>"Heritage at Risk Register"</i> . This	Amend the third Indicator to read:-

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			includes details of all the designated heritage assets at risk within Bradford (with the exception of Grade II Listed Buildings).	<i>"Number and % of each type of designated heritage asset deemed to be at risk"</i>
227	Paragraph 5.4.72	Factual correction	This Paragraph relates to the World Heritage Site and should be included as part of the previous section	Amend accordingly
227	Paragraph 5.4.70 to 5.4.72	Sound	We support this Section which sets out a good summary of the significance of Saltaire. We particularly welcome the requirement that development proposals should have regard to the World Heritage Site Management Plan, the World Heritage Site Environmental Capacity study and the Saltaire Conservation Area Appraisal.	-
229	Paragraph 5.4.79, line 4, final sentence	Unsound	The meaning of this final sentence is not at all clear.	Amend accordingly
232	Policy EN4	Sound	We support this Policy particularly Criterion B.2. It is especially important given the character of the District that the landscape setting of its settlements and heritage assets is fully taken into account in determining the appropriateness of development proposals.	-
239	Policy EN6	Sound	We support the requirement in Criterion B for all proposals for renewable and low carbon generation to include a full assessment of the environmental impacts including cumulative landscape and visual impacts.  Given the character of the plan area, such proposals could harm	-

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			elements which contribute to the distinctive character of the District.	
255	Policy EN9, Criterion A.2, line 3	Unsound	Whilst this Criterion makes reference to the need to ensure that the setting of heritage assets are not adversely affected, it should also include mention of the need to ensure that any assets themselves are not harmed.	Policy EN9, Criterion A.2, line 3 amend to read:- <i>"... to amenity, heritage assets or their settings, or the character etc"</i>
256	Policy EN9, Criterion B.2, line 3	Unsound	Whilst this Criterion makes reference to the need to ensure that the setting of heritage assets are not adversely affected, it should also include mention of the need to ensure that any assets themselves are not harmed.	Policy EN9, Criterion B.2, line 3 amend to read:- <i>"... to amenity, heritage assets or their settings, or the character etc"</i>
259	Policy EN10	Sound	Bradford is a major supplier of high-quality building stone. Consequently, we welcome this Policy which will help to ensure that a steady supply of building stone is available for the repair of historic buildings in Bradford and elsewhere and for new development in sensitive areas. We also welcome the proposal to ensure that sandstone reserves are used primarily for the supply of building stone and not for use as aggregates.	-
270	Policy EN12	Sound	Subject to the change set out below, we support this Policy insofar as it relates to sandstone particularly Criteria B. and E. Bradford is a major supplier of high-quality building stone and it is important that the availability of this resource is not compromised by other developments.	-
270	Policy EN12, Criterion	Unsound	Paragraph 5.5.36 explains that the purpose of Criterion B.4 is to cover those situations where	Policy EN12, Criterion B.4 amend to read:-

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	B.4		<p>there is a viable sandstone resource but which cannot be extracted without effecting such significant changes to the site levels that the proposed surface development becomes unviable.</p> <p>However, the Policy wording is less clear and appears to imply that if the extraction of the sandstone prejudiced the site's development for whatever reason, this would be sufficient to override the safeguarding of the mineral resource. Criterion B.4 needs to be amended to more clearly state its intentions.</p>	<p><i>"The applicant has demonstrated that the extraction of the sandstone would result in such significant changes to the ground levels that the proposed surface development would not be able to take place"</i></p>
283	Policy DS1	Sound	We support this Policy which should help to ensure that development within the District is of the highest standard and that it is appropriate to its context.	-
288	Policy DS3	Sound	We support this Policy which will help in ensuring that development proposals respond sensitively to their context and, where appropriate, help to reinforce the distinctive character of the area.	-

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

Yours faithfully,

Smith