

Local Plan for the Bradford District

Core Strategy DPD Proposed Main Modifications

Statement of Consultation & Summary of Representations

March 2016

CONTENTS

Chapter	Page
1. Introduction	1
2. Proposed Main Modifications Consultation	2
3. Summary of Representations	7

LIST OF APPENDICES

1. Statement of the Representation Procedure
2. List of Organisations and Bodies Consulted
3. Consultation Letter
4. Extracts from local news articles relating to the consultation
5. Extract from the E-Newsletter – Plan-it Bradford (November 2015)
6. Summary of Comments Received to the Proposed Main Modifications and Council Response.
 - MM1 – 37 - Section 3: Vision, Objectives and Core Policies
 - MM38 – 62 - Section 4: Sub Area Policies
 - MM63 – 71 - Section 5.1: Economy & Jobs
 - MM72 – 112 - Section 5.3: Housing
 - MM113 – 130 - Section 5.4: Environment
 - MM131 – 137 - Section 5.5: Minerals
 - MM138 - 146 - Section 5.6: Waste
 - MM147 – 148 - Section 6: Implementation & Delivery
 - MM149 – Section 7: Monitoring (**No comments**)
 - MM150 – 156 – Appendix

1.0 INTRODUCTION

- 1.1 The City of Bradford Metropolitan District Council (CBMDC) submitted its Core Strategy Publication Draft to the Secretary of State for Independent Examination on Friday 12th December 2014.
- 1.2 The Examination of the Core Strategy has been the responsibility Planning Inspector Stephen Pratt BA (Hons) MRTPI.
- 1.3 The Examination process involved a series of public hearings which took place between 4th until 20th March 2015 in Victoria Hall, Saltaire.
- 1.4 Following the Examination hearing sessions the Council:
- considered selected soundness issues raised by the Inspector and participants at the sessions;
 - reviewed the implications of changes to national policy, with regard to Affordable Housing Guidance Revocation of Thresholds and the Definition of Gypsy and Travellers, and relevant High Court Judgements;
 - completed a Gypsy and Traveller Accommodation Assessment; and
 - completed a Habitats Regulations Assessment Review.
 - Completed and published its third Strategic Housing Land Availability Assessment.
- 1.5 As a result of the above, the Council proposed a number of modifications to the Core Strategy - Publication Draft. These proposed modifications were set out in a schedule of Proposed Main Modifications and Additional Modifications, which were the subject of this public consultation during the Examination process.
- 1.6 The purpose of this Statement of Consultation is to set out how the City of Bradford Metropolitan District Council has consulted the public on the Core Strategy Development Plan Document (DPD): Proposed Main Modifications in accordance with the Town & Country Planning (Local Development) (England) Regulations 2012. This report will also provide a summary of the representations which were received during this consultation.
- 1.7 This report should be read as an addendum to the Submission Statement of Consultation (December, 2014).

2.0 CORE STRATEGY - PROPOSED MAIN MODIFICATIONS

- 2.1 The Council carried out the consultation on the Proposed Main Modifications in accordance with Regulations 17, 18, 19, 20, 22 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.2 The Council published its Proposed Main Modifications to the Core Strategy Publication Draft document for public consultation over an eight week period commencing Wednesday 25th November 2015 and ending at 4.00pm on Wednesday 20th January 2016.

Consultation documents and key supporting documents

- 2.3 The Core Strategy Proposed Main Modifications (2015) was the key consultation document which was published and made available for inspection at deposit locations.
- 2.4 Table 1 below provides a list of key supporting documents which were made available for inspection alongside the consultation document:

Table 1:

NATURE OF DOCUMENTS	CORE STRATEGY - SUPPORTING CONSULTATION DOCUMENTS
CONSULTATION DOCUMENT	<ul style="list-style-type: none"> • Proposed Main Modifications (PMM) (2015)
SUPPORTING DOCUMENT	<ul style="list-style-type: none"> • Proposed Additional Modifications (2015)
IMPACT ASSESSMENTS	<ul style="list-style-type: none"> • PMM - Sustainability Appraisal (2015) • PMM - Habitat Regulations Assessment Review (2015) • PMM - Equalities Impact Assessment (2015) • PMM - Health Impact Assessment (2015)
UPDATED EVIDENCE BASE DOCUMENTS	<ul style="list-style-type: none"> ▪ Gypsy & Traveller Accommodation Assessment (July 2015) ▪ Habitats Regulation Assessment Review (2015) ▪ Strategic Housing Land Availability Assessment 2015

	<i>A list of all Local Plan evidence base documents can be found on the Council's Core Strategy website.</i>
ENGAGEMENT MATERIAL	<ul style="list-style-type: none"> • Engagement Plan (2015) • Statement of the Representation Procedure (2015) • Representation Form • Guidance Note to accompany the Representation Form

2.5 In accordance with Regulation 17 the Council published a Statement of the Representation Procedure and a statement detailing the fact that proposed submission documents were available for inspection, including the places and times they were available for viewing. This document was also sent to specific and general consultation bodies. A copy of this document can be found in Appendix 1.

Who was consulted?

2.6 A total of 2,370 stakeholders, organisations, partnerships, members, groups and individuals held on the Local Plan consultee database were invited to make representations on the Proposed Main Modifications. These included statutory and other specific / general consultation bodies in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the CBMDC Statement of Community Involvement (SCI) (2008). A list of all those consulted can be found in Appendix 2.

How these bodies were invited to make representations?

2.7 The Proposed Main Modifications Engagement Plan (2015) outlined how statutory, general, other bodies and organisations, including members of the public on the Local Plan database would be notified of the issuing of the consultation documents document for formal representations under Regulation 20.

2.8 A total of 980 **postal notifications** (letters) were issued on Monday 23rd November 2015, and 1,390 **E-mail notifications** were sent on Wednesday 25th November 2015 to all those persons and organisations listed in Appendix 2, notifying them of the consultation. The notification included details of how to view the documents and inviting them to make representations by the set deadline. A sample of the letter can be found in Appendix 3.

2.9 Table 2 below provides an SCI breakdown and summary of how many consultees were notified of the consultation and by which method.

Table 2:

Local Plan Consultee Database	Total Number of Consultees	No. Informed by Letter (via Post)	No. Informed by E-mail
SCI 1 - Statutory	91	9	82
SCI 2 - General	315	186	129
SCI 3 - Other	378	111	267
SCI 3 - Other Minerals & Waste	40	36	4
SCI 4 - Councillors & MPs	95	0	95
SCI 4 - Notification Request – Email	1,521	638	883
Internal CBMDC Staff	25	0	25
TOTAL	2,370	980	1,390

Availability of the Consultation Documents

2.10 Electronic copies of the consultation document, key supporting documents (as listed in paragraph 2.3 and 2.4) and representation forms were available to view and download from the Council's Local Plan **Planning Policy website**.

(www.bradford.gov.uk/planningpolicy).

2.11 Hard copies of the consultation document and key supporting documents were placed for inspection at the following ten **deposit locations** listed below.

Notifications of these locations were given in the consultation letter, representation form guidance note, Statement of the Representation Procedure and on the Local Plan website.

- Council's Principal Planning Office in Bradford (Jacobs Well)
- Council One Stop Shops at Shipley and Keighley & Ilkley Town Hall.
- Main local libraries in the Bradford District: Bradford City Library, Bradford Local Studies Library, Bingley, Keighley and Ilkley.

(N.b. Shipley Library was closed for refurbishment during this consultation)

Methods of Consultation

2.12 The Council utilised **local press and media coverage** to provide information to the general public and publish details of the consultation and where to find the consultation information. The following newspapers specifically published notice of the consultation period to residents across the District. Copies of these can be found in Appendix 4.

- Telegraph and Argus on Tuesday 1st December 2015
- Keighley News on Thursday 3rd December 2015
- Ilkley Gazette on Thursday 3rd December 2015
- Craven Herald on Thursday 26th November 2015

2.13 The **Council's Local Plan website**, in particular the Core Strategy webpage, was used to facilitate communication of the consultation and the time period. Details of how people could comment on the consultation documents, along with a representation form, guidance note and an FAQ sheet were clearly provided to help people engage in the representation process.

2.14 **Issue 24 of the e-Newsletter - *Plan-It Bradford*** included details of the consultation. The newsletter was distributed via email to 1,379 subscribers in November 2015. This newsletter along with past editions is available to view on the Council's website. An extract of this newsletter can be found in Appendix 5.

Written Representations

2.15 The Council received a total of 118 duly made written representations within the eight week consultation period.

2.16 A total of 11 written representations were received by the council following the close of the formal deadline at 4pm on Wednesday 25th January 2016 and therefore are considered by the Council to be 'not duly made' representations.

2.17 The Council recorded the initial method of submission. The Council received 120 representations by E-mail and 9 representations by post.

2.18 The duly made representations included a range of statutory bodies, neighbouring local authorities, Town and Parish Councils, amenity and interest groups, developers, infrastructure providers, various under-represented groups and members of the

general public. The table 2 below provides a breakdown of consultation responses by consultee category.

Table 3:

Category of Respondent	No. of Responses Received
Statutory Bodies	10
Town & Parish Councils	5
Bradford MDC Councillors / MPs	5
Community Groups / Organisations	17
Agents	15
Individuals	66

3.0 SUMMARY OF CONSULTATION RESPONSES

3.1 The following sets out a summary of the main issues which were raised in relation to the Proposed Main Modifications. A full summary of these issues and the Council's response can be found in Appendix 6.

3.2 In the main the responses did not raise any significant new issues which had not been considered already as part of the examination process to date. The Council has identified the following main issues and sets out its high level response. Each issue is considered in turn below.

Issue 1: Duty to Cooperate

3.3 Concerns are raised by a number of respondents at the lack of evidence of the Council meeting the 'Duty to Cooperate' in particular in terms of the scale and location of new development, green belt change and impact on and future investment in infrastructure specifically within Wharfedale and also at Holme Wood.

3.4 Leeds City Council notes the main modifications which change the scale and distribution of development in particular in Wharfedale. They do not raise objection but restate the approach set out in the agreed LCR duty to cooperate table which identifies how cross boundary issues will be addressed going forward as part of the detailed allocation of land and green belt review in the allocations DPD.

Councils Response

3.5 The Council has set out in the Duty to Cooperate Statement (SD/006) how the Core Strategy preparation has met the legal duty in terms of on-going positive engagement with key bodies as relevant to their role and matters dealt with in the Core Strategy. The Statement also sets out how the work on the key strategic issues has evolved and how bodies have been engaged and to what effect in terms of the approach in the submitted Core Strategy.

3.6 The Statement sets out the agreed approach across the Leeds City Region (LCR) including the approved Statement of Cooperation and the template of strategic issues and how they have been dealt with and any mitigation or further / on-going work linked to subsequent plans, which was approved by the LCR Portfolio Holders in October 2014.

- 3.7 Many of the issues raised by those making representations will be picked up under the more detailed subsequent Development Plan Documents linked to allocations which will be subject to further work with duty to cooperate bodies as relevant to those plans. The compliance with the Duty to cooperate was the subject of the first hearing in March 2015 where the legal compliance was considered.
- 3.8 The representation from Leeds CC does not raise objection to the modifications but rather restates the agreed approach for addressing cross boundary impacts as set out in the Duty to Cooperate Statement (SD/006), see in particular Appendix 4 which sets out the issues and agreed approach.
- 3.9 No new duty to cooperate arise from modifications as already a recognised need to work through allocations on detailed cross boundary matters on both green belt change and infrastructure within these locations.

Issue 2: Housing requirement

- 3.10 While the main modifications did not propose a change to the overall housing requirements several representations from the development sector, have been made re-stating their earlier Publication Draft stage views that the housing requirement set out in the plan (Policy HO1) should be higher.
- .
- 3.11 Other representations re-state concerns that the housing requirement is too high and should be reduced based on various grounds including the ability of the market to deliver the housing and the main modification which changed employment projections.

Council's Response

- 3.12 The housing requirement has been informed by robust evidence. The approach is set out in the Background Paper 2 (SD/016) and the subsequent response to the Inspectors Matters and questions. The initial hearings fully considered the Councils approach. No new substantive evidence has arisen.
- 3.13 The Councils approach is based on robust and up to date evidence and accords with national guidance. No new evidence has arisen or further issues been raised through the representations which makes the Councils approach sound.

- 3.14 The conclusions of the further update report (EB/033) carried out by consultant Edge Analytics as part of joint working among Leeds City Region Local Authorities, confirm the robustness of the approach to objectively assessed housing need work which has informed the housing requirement.

Issue 3: Settlement Hierarchy

- 3.15 Several representations object to the change to the status of Burley and Menston from Local Service Centres to Local Growth centres under policy SC4 which raise concerns around the scale of development and impact on current infrastructure and services which are not considered adequate or sustainable for the proposed level of growth. Several representations restate the objection to the identification of Ilkley as a Principal town.

Council Response

- 3.16 The settlement hierarchy was based on robust evidence including the settlement study (EB/040 to EB/042) and the Bradford Growth Assessment (EB/037). The Council sets out further background to the settlement hierarchy in its response statement to the Inspectors matter 3.2 (PS/E003).
- 3.17 The evidence supported the categorisation of Ilkley as a Principal Town. The role of Ilkley and its place in the hierarchy was fully discussed at the initial examination hearings and the representations do not raise any new issues.
- 3.18 Paragraphs 3.56 to 3.60 of the Core Strategy explain the role and derivation of the Settlement Hierarchy. They explain that the Local Growth Centres tier was created partly due to land supply constraints in the upper two tiers and partly due to the fact there are significant differences in the characteristic of the settlements below the Principal Towns level (some having better accessibility and /or better ranges of services and facilities).It also reflected their ability to grow in a sustainable way.
- 3.19 Burley and Menston were identified in the CSFED as Local Growth Centres, informed by the Council's Settlement Study, in recognition of their location and accessibility to key transport links and their range of shops, services and community facilities.
- 3.20 Their status was changed within the CSPD as a result of the HRA which indicated the need for restrictions of the amount of housing development in the areas within

2.5km of the S Pennines SPA & SAC. Burley and Menston were at that point no longer considered settlements where significant growth could be accommodated so were placed in the bottom tier of the settlement hierarchy.

- 3.21 However the subsequent revisions to the HRA have removed the need to take a highly precautionary approach in limiting development within the 2.5km zone and Burley and Menston have been re-classified as a Local Growth Centres accordingly.

Issue 4: Housing Distribution

- 3.22 Concern has been raised in relation to the change to housing distribution (Policy HO3) and consequential changes to the text and tables within the Core Strategy's Housing chapter, in particular to proposed increases in housing within settlements within Wharfedale as well as Silsden in Airedale and the related upgrade to the status of Burley and Menston to Local Growth Centres in the settlement hierarchy (Policy SC4). Concern is raised in terms of impact of increased level of development on infrastructure, flooding, landscape, green belt and local character.
- 3.23 Other representations object to the lack of an increase within several settlements including Addingham and objections to reductions in Baildon and Haworth based upon the concerns of Historic England which those respondents suggest are not considered to be based on robust evidence.
- 3.24 Objections have been made to the lack of a change to the housing target for the Bradford South East area linked to the proposed urban extension at Holme Wood. Many of these respondents propose that a reduction is made in the housing target for Bradford South East and that this is facilitated by reversing the proposed reductions within the main modifications for certain parts of the Regional City combined or in combination with increases of a greater scale than that proposed within the main modifications elsewhere including Wharfedale.

Council's response

- 3.25 The Core Strategy is seeking to positively plan to meet its objectively assessed housing need. It is proposing to release land for over 42,100 new homes and planning to do so via the creation of new growth areas, most notably within the Shipley and Canal Road Corridor and via the regeneration of the City Centre and also through the creation of a new urban extension at Holme Wood. Positively planning for need involves not only providing for the right number of new homes but

as far as possible locating those homes in or close to the areas of greatest need. Within the District, those housing needs are most acutely focused in the areas which are likely to see the greatest levels of population change which are in the larger urban centres and not in the smaller villages. Following the main modifications the Council's proposed distribution of housing reflects these patterns of need and is still overwhelmingly focusing development within the main urban centres. The proposed distribution as amended represents a sustainable development strategy in line with NPPF Core Planning Principles. The amendments to the housing distribution are necessary in the light of the updated evidence base and the revised HRA. They also reflect specific concerns raised by Historic England which have been considered carefully by the Council. They are therefore a modest but reasonable and justified amendment to the approach within the CSPD.

- 3.26 The supporting text to Policy HO3 sets out the approach adopted with regards to housing distribution. The distribution is based upon the Core Policies in particular SC4 which sets out the settlement hierarchy. Further information on the approach to distribution is set out in Background Paper 2 Housing Part 1 (SD/016) published in support of the Publication Draft.

Issue 5: Green Belt review

- 3.27 The main concerns raised relate to the exceptional circumstances necessitating green belt change. Objections challenge and question whether there is a need and/or exceptional circumstances for green belt release to meet housing needs. This came mainly from respondents concerned about the level of development being proposed and also concern broadly from developers as to the scope and nature of green belt review proposed which is set out in Policy SC7.
- 3.28 Related concerns have been raised as to the need for urban extensions in particular the identification of Holme Wood in this respect.
- 3.29 Several representations restate earlier objections which raised concern that the reviewed green belt will not meet NPPF requirements to last well beyond the plan period and in this respect suggest that the Core Strategy should seek to set out the need to designate safeguarded land in the Allocations DPD. Other responses raised the issue of the nature of the green belt review (full partial) and its relationship with any strategic review of green belt across the LCR and its relationship with the allocations DPD.

Council's Response

- 3.30 Policy HO2 together with the Council's Housing Background Paper clearly set out the evidence which indicates that there are exceptional circumstances which justify releasing green belt to meet the objectively assessed needs for new homes in the District. This was supplemented in the Council's response to the Inspectors' Matters and questions under matter 3.4 (PS/E003) and fully considered at the relevant examination hearing. As a result of the discussions at the hearing the Council prepared a further statement which elaborated on the exceptional circumstances (PS/F067). This was published for comment. A further document was prepared by the Council in response to the further issues raised by participants (PS/F086b).
- 3.31 In addition, Policy HO7 seeks to ensure that in the site selection process the use of green belt land is minimised. The Housing Requirement for the plan period cannot be met in full without the use of land currently designated as Green Belt. Based upon the SHLAA update 2013 there may be a need for up to 11,000 dwellings to be delivered on land formerly Green Belt.
- 3.32 Having established that the land supply in non-green belt locations is not available to meet the District's needs the Council commissioned a District Wide Growth Assessment. This has confirmed both that there are sustainable locations within the green belt for growth and that there are areas where the green belt can be changed without leading to the undermining of the role of the green belt either locally or strategically. NPPF paragraph 47 makes clear that Local Plans should meet their objectively assessed housing need in full. Paragraph 83 allows for the review of Green Belt boundaries under exceptional circumstances through the preparation of the Local Plan.
- 3.33 Policy SC7 has been drafted to ensure that the key purposes of green belt as well as any strategic role it performs are considerations in any changes to the boundaries. The detailed changes will be undertaken in the Allocations DPD. It is also noted that land supply indicates change is required to Green Belt in most settlements.
- 3.34 In terms of safeguarded land the representations restate previous arguments which were fully discussed at the examination.

Issue 6: Other Housing Policies

- 3.35 A number of representations have been received relating to the proposed changes to Policy HO4 which deals with the phased release of housing sites (main modifications MM89 - MM92). Some representations repeat earlier CSPD stage objections based on alleged non-compliance with the NPPF. Others offer a qualified or unqualified support to new criterion D which allows for the early release of large of complex sites and new criterion E which relates to maintaining a 5 year land supply of deliverable sites. A number of representations are received advocating minor changes or additional text to clarify certain points. Some respondents suggest that greater certainty should be given on which sites would be phased and which sites would be considered for early release under criterion D. A small number of objections re-iterate earlier made representations in support of the 'Sedgefield method' for resolving any backlog of housing delivery.
- 3.36 A small number of representations have been received to Main Modification MM93-95 which deals with Policy HO5 and the issue of density. Some comments support the change, others request further clarification or repeat earlier concerns that 30dph density target is not achievable.
- 3.37 A small number of objections have been received to main modifications MM96 and MM97 which make minor changes to Policy HO6 (Previously Developed land). The concerns are that the removal of the words 'minimum' and 'at least' weaken the policy.
- 3.38 Representations were received in support of the changes to policy HO9 (Housing Quality) and supporting text) but also objections to the approach taken to accessible and space standard standards in light of new national housing standards.
- 3.39 Objection is made to the thresholds and targets under policy HO11 (Affordable Housing)
- 3.40 A small number of representations have been received relating to Main Modification MM110 which relates to Policy HO12. Policy HO12 deals with provision and need for new accommodation for travellers and travelling showpeople. The policy has been updated in the light of a new Accommodation Assessment and also changed to add clarity and emphasise the role of constructively working with the local community and

other stakeholders. Some of the representations support the modifications while a few raise concerns that the study may have under estimated need.

Council's Response

- 3.41 With regards to Policy HO4, the Council considers that the representations raise no new substantive issues and is encouraged that some respondents who have objected to Policy HO4 nonetheless consider the proposed amendments helpful. The Council considers that it has already demonstrated that the policy would not conflict with the NPPF and would assist in managing growth in a sustainable way. It has previously demonstrated that the policy would not undermine or hold back delivery. The Council does not consider that any further changes or clarifications are necessary and any detailed matters can be adequately dealt with as part of the Allocations DPD.
- 3.42 With regards to Policy HO5 the Council considers that no further changes are required and that the policy as drafted is clear and now incorporates the right balance between the guidance it gives while still retaining flexibility.
- 3.43 With regards to Policy HO6 the Council does not agree that the modifications weaken the policy and consider the changes necessary to underline the fact that the percentages quoted in the policy are targets and not requirements and also necessary to ensure that they are realistic given the nature of the land supply.
- 3.44 With regards to policy HO9 (Housing Quality) the Council consider that the policy as proposed to be modified is justified with regards to evidence and is in line with national policy and guidance including the new national housing standards.
- 3.45 With regards to the thresholds and targets under policy HO11 (Affordable Housing) the council consider them to be fully justified, effective and consistent with national planning policy in regards to meeting affordable housing need and consideration of economic viability as set out in PS/E004f - Council Further Statement Matter 4F Affordable Housing and oral comments upon Matter 4F of the examination hearing sessions.
- 3.46 The Council considers the changes to Policy HO12 are justified and that the new Gypsy and Traveller Accommodation is robust and has not under estimated need.

Issue 7: Flood Risk

- 3.47 A large number of representations raised concerns over the approach to flood risk which in the main was prompted by recent flooding events over the Christmas period. Concerns are raised to the deliverability of the scale of development in particular housing given increased flooding events and areas impacted by flood waters. Other concerns are raised as to the adequacy of policy EN7 in particular with regards to surface water and adequacy of sustainable drainage.

Council Response

- 3.48 The Council acknowledges that December 2015 saw a significant flood event which had severe impacts on a number of areas within the district. However the potential for severe flood events is not a new issue which was not apparent or considered as part of the development of the Core Strategy Publication Draft. The assessment of flood risk and the production of a strategy which distributes development in a way which minimizes the use of areas at risk of flooding is an important and significant issue which the Core Strategy has addressed.
- 3.49 The Council's approach to flood risk, both in terms of its policies and in terms of the evidence underpinning those policies is considered to sound, robust and in accordance with Government policy within the NPPF. The Council notes that since the initial examination hearings there have been no changes in the NPPF relating to flood risk and there have been no objections raised to the original or the revised housing distribution by the statutory agency the Environment Agency.
- 3.50 The Council has gathered evidence in the form of a Strategic Flood Risk Assessment (EB/048), worked constructively and co-operatively with the Environment Agency and has adopted a sequential approach to the distribution of the district wide housing requirement. In doing so it has demonstrated that the vast majority of development in the district will be accommodated on areas within flood risk zone 1, the area with the lowest risk of flooding from fluvial sources. It is able to guarantee this because the SHLAA has identified sufficient sites in flood zone 1 and had discounted as unsuitable sites which fall within flood zone 3b (this is the functional flood plain).
- 3.51 The Council has revised and updated the flood risk sequential background paper using the proposed slightly modified housing distribution and updated land supply data in SHLAA 3. The results actually show an improvement in that the need for flood zone 2 and 3a land which was already only a tiny proportion of the overall housing

requirement has actually reduced. This is largely due to the increased capacity of sites within the Bradford City centre Area.

- 3.52 Policy, EN7, which embeds the sequential approach within the whole of the Local Plan making process and will ensure that the site selection process within the Allocations DPD focuses on sites which minimise flood risk, and includes proposals to manage and mitigate the impacts of new development taking account of all sources of flooding including ground water flooding.

Issue 8: South Pennine Moors and Habitats Regulation Assessment (HRA)

- 3.53 Natural England supported the further work on the HRA and the associated changes to Policies SC8, EN2 and relevant sub area policies. Issues have been raised in the representations received relating to data, the use of information in the assessment, the effectiveness of mitigation measures and the re-drafting of SC8 and accompanying text. In relation to the accompanying text, it was considered that individual clauses taken directly from elements in the Regulations and more technical definitions needed to be inserted into the language of the general planning text in a number of instances.
- 3.54 Several respondents raised concerns with the approach to the HRA and consistency with other work in adjoining areas such as Harrogate and approach taken to consideration of the designated areas in North Yorkshire.

Council Response

- 3.55 The Council has confidence in the HRA Report of November 2015, which includes an element of technical review and assesses the proposed modifications and that the issues raised in the representations have been adequately addressed. This has been produced by consultants Urban Edge who are experienced in carrying out HRA work. Natural England have agreed with the assessment approach and conclusions, provided that all mitigations measures are appropriately developed and secured.
- 3.56 The context for the substance of the modifications proposed by the Council is the HRA Report of November 2015, advice from Natural England and modifications to policy SC8. The further changes proposed are not considered appropriate or required to make the plan sound.

Issue 9: Sustainability Appraisal

- 3.57 Several respondents make comments on the adequacy of the Sustainability Appraisal published in support of the Main Modifications.

Council Response

- 3.58 The Council published a supporting updated SA in line with national requirements which assessed the main modifications proposed. This was in line with the approach and methodology undertaken throughout the preparation process and in line with national guidance and good practice. The approach was appropriate to the level of the local plan document being proposed which deals with strategic matters.
- 3.59 The Council did not receive any comments on the Additional Modifications document.

Appendix 1: Statement of Representation Procedure

**City of Bradford Metropolitan District Council
Bradford District Local Plan**

**Planning and Compulsory Purchase Act 2004;
The Town and Country Planning (Local Development) (England) Regulations 2012.**

**NOTICE OF PUBLICATION OF PROPOSED MAIN MODIFICATIONS TO THE CORE
STRATEGY DEVELOPMENT PLAN DOCUMENT (DPD) - PUBLICATION DRAFT AND
STATEMENT OF REPRESENTATIONS PROCEDURE**

Notice is hereby given in accordance with the above Regulations that the City of Bradford Metropolitan District Council has published the afore-mentioned Development Plan Document and that following consultation it proposes to submit those documents to the Secretary of State for independent examination.

The following details accompany consultation on the Core Strategy Publication Draft document, as required by Regulation 19 and 20 of the above Regulations 2012.

Title of documents	Core Strategy DPD – Proposed Main Modifications Schedule
Subject Matter	<p>The Core Strategy DPD sets out the spatial vision for land use across the Bradford District until 2030, setting out strategic policies to guide the delivery of development, prioritising sustainable development in planning for population growth, economic prosperity, social equality, securing regeneration and planning for infrastructure whilst maintaining, protecting and enhancing environmental quality and respecting local character and distinctiveness.</p> <p>The Council submitted its Core Strategy Publication Draft to the Secretary of State on Friday 12th December 2014.</p> <p>The examination of the plan involved a series of public hearings which took place between 4th until 20th March 2015.</p> <p>The Council is now proposing Main Modifications to the Core Strategy - Publication Draft consequent upon;</p> <ul style="list-style-type: none">▪ Consideration of selected soundness issues raised by the Inspector and participants at these sessions,▪ Review of the implications of recent changes to national policy, with regard to Affordable Housing Guidance Revocation of Thresholds and the Definition of Gypsy and Travellers, and relevant recent High Court Judgements,▪ Completion of a Gypsy and Traveller Accommodation Assessment,▪ Completion of a Habitats Regulations Assessment Review.
Area covered	City of Bradford Metropolitan District
Consultation period	Written representations are invited during the 8 week consultation period commencing on Wednesday 25 th November 2015 and concluding at 4pm on Wednesday 20 th January 2016.
Address for representations	Representations must be made in writing and are strongly encouraged to be submitted on the provided Representation Form.



	<p>Representations may be submitted electronically via E-mail to:</p> <p>planning.policy@bradford.gov.uk.</p> <p>Local Plan Group City of Bradford Metropolitan District Council 2nd Floor South Jacobs Well Nelson Street Bradford BD1 5RW</p>
Notification of Examination	<p>Any representation may be accompanied by a request to be notified of these stages at a specified address when:</p> <p>i.) the report of the Inspector (appointed by Government to carry out an independent examination into the DPD) is published;</p> <p>ii.) the Core Strategy DPD has been adopted.</p>

PUBLICATION

The Council's Core Strategy Proposed Main Modifications Schedule will be published for representations on **Wednesday 25th November 2015**. Representations are invited and encouraged on the Representation Form provided.

This is your last opportunity to comment on the Plan. At this stage we are only inviting views on the Proposed Main Modifications in relation to the legal compliance, soundness and compliance with the duty to co-operate.

More information about legal compliance, soundness and the duty to co-operate can be found in the Council's 'Guidance Note to accompany the Representation Form' and the guidance from the Planning Inspectorate entitled 'Examining Local Plans Procedural Practice' (December, 2013), available from <http://www.planning-inspectorate.gov.uk>.

Representations must be received by via the methods outlined above by **4pm on Wednesday 20th January 2016**.

Group Responses - Where there are groups who share a common view on how they wish to see the Plan changed, it would be very helpful for that group to submit a single representation which represents the view of the group, rather than separate individual representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Inspection

The Proposed Main Modifications to the Core Strategy Publication Draft and relevant support documents are available to view on the Council's website at: www.bradford.gov.uk/ldf from Wednesday 25th November 2015.

These documents will also be available for inspection at the following **Council Offices** (Mon-Thurs 9am-5pm; Fri 9am-4.30pm) and at the main **local libraries** (Mon-Fri 9am-7pm; Sat 9am-5pm):

Main Council Offices

- Planning Reception, Jacobs Well, Nelson Street, Bradford, BD1 5RW
- Shipley Town Hall, Kirkgate, Shipley, BD18 3EJ
- Keighley One Stop Shop, Town Hall, Bow Street, Keighley, BD21 3SX
- Ilkley Town Hall, Station Road, Ilkley, LS29 8HA (**By appointment only – First Thursday of the month*)

Main Local Libraries

- Bradford City Library, Centenary Square, Bradford, BD1 1NN
- Bradford Local Studies, Princes Way, Bradford, BD1 1SD (Access off Sharpe Street)
- Bingley Library, Myrtle Walk, Bingley, BD16 1AW
- Keighley Library, North Street, Keighley, BD21 3SX
- Ilkley Library, Station Road, Ilkley, LS29 8HA

FURTHER INFORMATION

For further information please contact the Local Plan Group by phone on (01274) 433679 or by E-mail at: planning.policy@bradford.gov.uk.

Appendix 2: List of Organisations and Bodies Consulted

APPENDIX 2:

LIST OF ORGANISATIONS AND BODIES CONSULTED ON PROPOSED MAIN MODIFICATIONS (2015) REGULATION 18(1) AND 19

SCI 1 - Statutory Consultation Bodies

- Airedale NHS Foundation Trust
- Bradford & Airedale Teaching Primary Care Trust
- Bradford Hospitals NHS Trust
- Bradford Community Health Trust
- British Telecom
- EE
- Historic England
- C/o National Grid
- Environment Agency
- Highways England
- Natural England
- Natural England
- Network Rail
- NHS Airedale, Wharfedale and Craven Clinical Commissioning Group
- NHS Bradford City and Bradford Districts Clinical Commissioning Group
- NHS Property Services Ltd
- Telewest Communications
- The Coal Authority
- Three
- Vodafone & O2
- West Yorkshire Police Crime Prevention
- West Yorkshire Police
- Yorkshire Water
- West Yorkshire Police

SCI 1 - Statutory Consultation Bodies – Adjoining Local Planning Authorities

- Calderdale Metropolitan Borough Council
- Craven District Council
- Harrogate District Council
- Kirklees Metropolitan Council
- Lancashire County Council
- Leeds City Council
- North Yorkshire County Council
- Pendle Borough Council
- Wakefield District Council

SCI 1 - Statutory Consultation Bodies – Town and Parish Councils in the Bradford District

- Addingham Parish Council
- Baildon Parish Council
- Bradford Trident Community Council
- Burley Parish Council
- Clayton Parish Council
- Cullingworth Parish Council
- Denholme Town Council

- Harden Parish Council
- Haworth, Cross Roads & Stanbury Parish Council
- Ilkley Parish Council
- Keighley Town Council
- Menston Parish Council
- Oxenhope Parish Council
- Sandy Lane Parish Council
- Silsden Town Council
- Steeton with Eastburn Parish Council
- Wilsden Parish Council
- Wrose Parish Council

SCI 1 - Statutory Consultation Bodies – Town & Parish Councils in Neighbouring Authorities

- Bradleys Both Parish Council
- Cononley Parish Council
- Cowling Parish Council
- Denton Parish Council
- Draughton Parish Council
- Drighlington Parish Council
- Farnhill Parish Council
- Gildersome Parish Council
- Glusburn Parish Council
- Laneshaw Bridge Parish Council
- Middleton Parish Council
- Nesfield with Langbar Parish Council
- Otley Town Council
- Sutton-in-Craven Parish Council
- Trawden Forest Parish Council
- Wadsworth Parish Council
- Weston Parish Council

SCI 2 - General Consultation Bodies (Postal Notification)

- Activity and Recreation Centre Association - Bradford
- Aldersgate Parent / Toddler Group
- All Saints Landmark Centre
- Allerton Community Association
- Anand Milan Centre
- Anchor Housing Association
- Apperley Bridge Development Residents Association
- Asian Business Forum
- Asian Trades Link
- Attock Community Association
- Baildon Community Council
- Baildon Community Link
- Bangladeshi Community
- Bangladeshi Community Association - Keighley
- Bankfoot Partnership
- Bedale Centre
- Bierley Community Centre
- Bingley CVS
- Bingley Labour Party
- Black Mountain Millennium Green/Brunel Community Association
- Black Women's Support Project
- Bolton Villas HUB Project

- Bolton Woods Community Association
- Bracken Bank & District Community Association (Sue Belcher Centre)
- Bradford & District Coalition of Disabled People
- Bradford & Ilkley College
- Bradford & Northern Housing Association
- Bradford and District Association of Deaf People
- Bradford Association of Visually Impaired People & Centre for Deaf People
- Bradford Botany Group
- Bradford Cathedral
- Bradford City Farm Association Ltd
- Bradford Community Environment Project
- Bradford Community Health Trust
- Bradford CVS
- Bradford East Area Federation
- Bradford Joint Training Board
- Bradford Khalifa Muslim Society (Heaton Community Centre)
- Bradford Lesbian and Gay Youth
- Bradford Night Stop
- Bradford Older People's Alliance
- Bradford Ornithological Group
- Bradford Ramblers Association Group
- Bradford Retail Action Group
- Bradford Urban Wildlife Group
- Bradford Youth Africa
- Braithwaite People's Association
- Brunel Support Works
- Buttershaw Christian Family Centre
- Cafe West
- Canterbury Youth and Community Centre
- Cathedral Centre Project
- Checkpoint / Bradford West Indian Community Centre Association
- Claremont Community Trust
- Clarke Foley Centre
- Clayton Village Hall Community Centre
- CNet
- Community Service Volunteers
- Community Team Learning Disabilities
- Communityworks
- Cottingley Cornerstone
- Crossflats Village Society
- DDA Task Team
- Delius Arts and Cultural Centre
- Denholme Community Association
- Denholme Residents Action Group
- Denholme Residents Action Group (DRAG)
- Dial Bradford
- Disability Support (DS)
- Drovers Way Residents Group
- Eccleshill Youth And Community Association Ltd
- Eldwick & Gilstead Horticultural Society
- Eldwick Village Society

- Fagley Lane Action Committee Group
- Fagley Youth and Community Centre
- Friends of The Gateway
- Frizinghall Community Centre
- Girdlington Action Partnership
- Girdlington Community Association
- Goitside Regeneration Partnership
- Grange Interlink Community Centre
- Greenhill Action Group
- Hainworth Wood Community Centre
- Harden Village Society
- Haworth & Oxenhope District
Bridleways Group
- Haworth Community Centre
- Hazel Beck Action Group
- Heaton St Barnabas Village Hall
- Heaton Woods Trust
- Highfield Community Centre
- Hopes Centre
- Idle Cricket Field Company Ltd
- Ilkley Design Statement Group
- Lyss Localities West
- KADAL
- Karmand Community Centre
- Keighley Association Women's and
Children's Centre
- Keighley College
- Keighley Disabled People's Centre
- Kirkland Community Centre
- Labrys Trust
- Laisterdyke Trinity Community Centre
- Leeds Bradford 20-30's Ramblers
- Lidget Green Community Partnership
- Light of The World Community Centre
- Long Lee Village Hall
- Manningham & Girdlington SRB
- Manningham Community
Development Centre
- Manningham Mills Community
Association
- Margaret McMillan Adventure
Playground Association
- Marshfield Community Association
- Masts
- Menston Community Association
- Micklethwaite Village Society
- Millan Centre
- National Media Museum
- Newton Street Day Centre
- North Community Centre
- North East Windhill Community
Association
- Oakdale Residents Association
- Oakworth Village Society
- Oxenhope Social Club
- PACT
- Pakistan Community Neighbourhood
Association
- Pan African Arts and Cultural Group
- Parkside Community Centre
- Plevna Area Resident's Association
- Polish Community Centre - Friday
Group

- Princeville Community Association
- Queensbury Community Centre
- Queensbury Community Programme
- Ravenscliffe & Greengates Community Forum
- Ravenscliffe Community Association
- Ravenscliffe Youth Centre
- Rockwell Centre
- Royds Advice Service
- Royds Community Association
- Ryecroft Community Centre
- St John's Luncheon Club
- St Christopher's Youth Project
- St Francis Village Hall / St Peters PCC
- St Mary's New Horizons Care in the Community
- St Oswald's West End Centre
- Salvation Army - Holmewood
- Sangat Community Association
- Save Us Pub
- Scholemoor Community Association
- Shipley and Bingley Voluntary Services - Bingley branch
- Shipley Constituency Area Panel Advisory Group (SCAPAG)
- Shipley CVS
- Shop Mobility
- Shree Krishna Community Centre
- Silsden Town Action Group
- Sleningford Area Residents Association
- South Square Centre
- Springfield Youth And Community Centre
- Stockbridge Neighbourhood Development Group
- The Bradford City Centre Project
- The Diamond Community Cafe
- The Girlington Centre
- The Khidmat Centre
- The Kirkgate Centre
- The Kirkgate Centre
- The St Hugh's Centre
- The Vine Trust
- Thornbury Centre
- Thornbury Youth Association
- Thornton Community Partnership
- Thorpe Edge Community Forum & RCDP
- Thorpe Edge Community Project
- Throstle Nest RDA Group
- Tong .& Holme Wood Parochial Church Council
- Touchstone Project
- Transport 2000
- Transport 2000
- University of Bradford
- Visual Disability Services
- West Central Area District Federation Tenants & Residents
- Wilsden Village Hall
- Woodhouse & Springbank NF
- Woodlands Cricket Club - Oakenshaw
- Woodside Action Group
- Wyke Armature Rugby League Club
- Wyke Christian Fellowship

- Wyke Community And Children's Centre Ltd
- Wyke Manor Community Centre

SCI 2 - General Consultation Bodies (Email Notification)

- Able All
- Advocacy Peer Support Group for Disabled People
- Aire Rivers Trust
- Airedale Partnership
- Airedale Partnership
- Arrowsmith Associates
- Baildon Friends of the Earth
- Baildon Moravian Church
- Baildon Residents Against Inappropriate Development
- BANDAG
- Barton Willmore
- Ben Rhydding Action Group / Save Us Pub
- Ben Rhydding Green Belt Protection Group
- Bierley Community Association & Bethel Community Church
- Bingley Branch Labour Party
- Bolton Woods Community Centre
- Bradford Breakthrough Ltd
- Bradford City Centre Residents Association
- Bradford Disability Services
- Bradford District Senior Power
- Bradford Friends of the Earth
- Bradford South & West Live at Home Scheme
- Braithwaite & North Dean Action Group
- Burnett Planning
- Carlisle Business Centre
- Carter Jonas LLP
- CBMDC - Environment Partnership
- CBMDC - Strategic Disability Partnership
- CNet
- Colin Appleyard
- Cottingley Community Association
- Denholme Community Association
- Disabled Peoples Forum
- DPP
- East Bierley Village Association
- Eldwick Memorial Hall Trust
- Equity Partnership - Bradford LGB Strategic Partnership
- Fagley Tenants & Residents Association
- Forster Community College
- Friends of Buck Wood
- Friends of Ilkley Moor
- Friends of Pitty Beck
- George Wright
- Gilstead Village Society
- Greenhill Action Group
- Greenwood Youth and Community

- Association
- Haworth Village Trust
- Highfield Healthy Lifestyle
- Holme Christian Community
- Holme Church / Holme Christian Community
- Holme Wood & Tong Partnership Board
- How Planning
- Iain Bath Planning
- ID Planning
- Ilkley CVS
- Ilkley Design Statement Group
- Ilkley Grammar School
- Incommunities
- Inspired Neighbourhoods
- Jane Dickman Associates
- Johnson Brook Planning & Development Ltd
- Johnson Brook Planning & Development Ltd
- Keighley & Worth Valley Railway Preservation Society
- Let Wyke Breathe
- Low Moor Local History Group
- Lowerfields Primary School
- Menston Action Group
- Menston Cares
- Menston Community Association
- Mobility Planning Group
- Nathaniel Lichfield & Partners
- Nathaniel Lichfield & Partners
- Nexus Planning Ltd
- Oakenshaw Residents' Association
- Odsal Residents Association
- Rural Solutions
- Saltaire Village Society
- Scholemoor Beacon
- SDS Land Ltd
- Sedbergh Youth & Community Centre
- Sensory Needs Services
- Shipley College Library
- Shipley Golf Club
- South Bradford Community Network
- Southmere Primary School
- Spawforths
- St John the Evangelist Church
- Stride Works Consultancy
- Sutton Community Association
- Tesco Stores Ltd
- The Bronte Society
- Thornton Moor Windfarm Action Group
- Tong & Fulneck Valley Association
- Tong Village Community Association
- Turley
- Turley Associates
- Univeristy of Bradford
- Walker Morris
- Walton & Co
- Wharfedale & Airedale Review Development
- Windhill Community Centre
- WYG
- YMCA - City of Bradford

SCI 3 – General Consultation Bodies - Other Consultees (Postal Notification)

- A A Planning Services
- A Furness
- Aireborough Planning Services
- Al-Farouq Associates
- Alzheimers Society
- Ancient Monuments Society
- B K Designs
- Baildon Civic Society
- Banks Long & Co
- Barrat Homes (Northern)
- Bingley Civic Trust
- BJ Design Services
- Blue Room Properties
- Brooke Properties
- Burnett Planning & Development
- CABE
- Caddick Development
- Calder Architectural Services Limited
- Carter Jonas
- Chris Thomas Ltd
- Clear Designs
- Commercial Estates Group
- Contract Services
- Council for British Archaeology
- Countryside Properties (Northern) Ltd
- CPRE West Yorkshire
- Dales Design And Developments
- Depol Associates
- Diocesan Board of Finance
- DPDS Consulting Group
- Dr H Salman
- E&M Batley Chartered Architects & Surveyor
- Eddisons Commercial
- Eddisons Commercial
- F And W Drawing Services
- F M Lister & Son
- Farrell and Clark
- First
- First
- Four Square Drawing Services
- G R Morris Town Planning Consultant
- G Sutton
- George Wimpey Northern Yorkshire Ltd
- Goldfinch Estates Ltd
- GP Planning And Building Services
- Hackney Carriage Proprietors Association
- Ham Group
- Hartley Planning Consultants
- How Planning
- Hurstwood Group
- Islamic Relief
- J G Nolan
- J R Wharton Architect
- J S Wright
- J Slater
- Joseph Rowntree Charitable Trust
- Keighley Community Transport
- Keighley Voluntary Services
- Kelly Architectural Design

Core Strategy DPD: Proposed Main Modifications

Statement of Consultation (2016)

- Leeds / Bradford International Airport
- Littman Robeson
- Martin Smith Designs
- Michael Beaumont
- Michael Hudson
- Morley Borough Independents
- National Farmers Union
- New Horizons
- North Country Homes Group Ltd
- Npower Renewables
- Oltergraft Planning Services
- P J Draughting Services Ltd
- Parkgate Design
- Parkgate Design
- Planning And Design
- Planning Inspectorate
- Plot of Gold Ltd
- Prince's Foundation
- Purearth PLC
- Ramblers Association
- Robinson Architects
- Rosedale Draughting Services
- Royal Mail Property Holdings
- Rural Action Yorkshire
- Safer City – Bradford & District
- Society for the Protection of Ancient Buildings
- South Pennines Association
- South Pennines Packhorse Trail Trust
- Star Keys Estate Agents, Valuers & Surveyors
- Stephen F Walker
- SWG Planning Services
- The Abbeyfield Society
- The British Horse Society
- The Emerson Group
- The Georgian Group
- The Moravian Manse
- The Twentieth Century Society
- The Victorian Society
- Turner Associates
- Urban Splash
- Vincent and Gorbing Ltd
- VJ Associates
- Webb Seeger Moorhouse Partnership Limited
- West Yorkshire Ecology
- West Yorkshire Passenger Transport Executive & Authority
- Westfield Shoppingtown Ltd
- William Walker Partnership
- Working Architects Co-Op Limited
- Yorkshire Gardens Trust
- Yorkshire Gardens Trust
- Yorkshire Riding Centre
- Yorkshire Union of Golf Clubs
- Aggregate Industries UK
- ASHLAR stone products
- M & M Stone
- Birks Royd Stone Ltd
- Bradley Natural Stone Products
- CEMEX UK Operations
- Clayax Yorkstone Ltd
- Colas Ltd

- Combined Masonry Supplies
- Darrington Quarries Ltd
- Dolmens
- Ennstone Johnstone
- Hainworth Shaw Quarries
- Hard York Quarries Ltd
- Lafarge Aggregates & Concrete UK
- M & G Stone Ltd
- Midgeham Cliff End Quarry Ltd
- Myers Group
- Naylor Hill Quarry
- New Close Farm
- P Casey (Enviro) Limited
- Parkinson Spencer Refractories Ltd
- Phillip Summers Groundworks Ltd
- Quarry Products Association
- Russell Stone Merchants
- S M Building Products
- Shipley Stone Sales
- Sibelco UK
- Stone Federation Great Britain
- The British Aggregates Association
- The Green Mineral Company
- Vista Environmental Limited

SCI 3 – General Consultation Bodies - Other Consultees (Email Notification)

- Addingham Civic Society
- Age Concern
- Ainscough Strategic Land
- Airedale Enterprise Services
- Allison & MacRae Ltd
- Alyn Nicholls and Associates
- Archi-Structure - A Al-Samarraie
- Architectural Design
- Arrowsmith Associates
- Arts Team
- Aspinall Verdi
- Associated Waste Management Limited
- Banks Renewables
- Barker & Jordan Architects
- Barratt & David Wilson Homes Yorkshire West
- Barton Wilmore
- Beckwith Design Associates
- Bellway
- Belmont Design Services
- Bilfinger GVA
- Bowman Riley Partnership
- Bradford Chamber of Commerce & Industry
- Bradford Civic Society
- Bradford District Chamber of Trade
- Bradley Stankler Planning
- Brewster Bye Architects
- Brookhouse Group
- Brother Investments (Yorkshire) Ltd
- Butterfield Signs Limited
- Cala Homes Yorkshire
- Campaign for Real Ale
- Canal River Trust
- Carter Jonas
- Chatsworth Settlement Trustees - Bolton Abbey
- Checkley Planning
- Chris Eyres Design
- CJS Designs
- CLR Architects

Core Strategy DPD: Proposed Main Modifications

Statement of Consultation (2016)

- Commercial Developments Projects Limited
- Council For Mosques
- CPRE Bradford District
- Craven Design Partnership
- Cunningham Planning
- Dacres
- David Hill LLP
- David R Bamford & Associates
- Deloitte
- Design Council Cabe
- Design Studio North
- Dev Plan
- Dev Plan
- Dickman Associates Ltd
- Directions Planning Consultancy
- DJ Richards
- DLP Planning Consultants
- Drivers Jonas
- DTZ
- EnergieKontor
- Eric Breare Design
- Eye 4 Design
- F S K Architectural Services
- Fairhurst
- Firebird Homes
- First Bradford
- Firstplan
- Forestry Commission
- Foresight Bradford
- Forward Planning & Design
- Fox Land & Property
- G L Hearn Property Consultants
- G W P Architects
- GA Sorsby - Graphic Architecture
- George E Wright
- George F White
- George Wimpey
- George Wimpey West Yorkshire Ltd
- George Wright
- GL Hearn
- Gladman Developments
- Hallam Land Management Limited
- Halliday Clark
- Halton Homes
- Hanson UK
- Hartley Planning Consultants
- Healy Associates
- Heritage Planning Design
- Holdgate Consulting
- Home Builders Federation
- Husband and Brown Limited
- ID Planning
- IHC Planning
- Ilkley Civic Society
- Indigo Planning
- Inland Waterways Association
- J C Redmile
- J O Steel Consulting
- Jacobs
- Janus Architecture
- Jeff McQuillan Consulting
- Jeff Redmile
- Jefferson Sheard Architects
- Jennings Nicholson Associates
- John Thornton Chartered Architect
- Jones Day
- Jones Lang LaSalle
- Just West Yorkshire
- JWPC Limited
- KeyLand Developments

Core Strategy DPD: Proposed Main Modifications
Statement of Consultation (2016)

- Khawaja Planning Services
- Kirkwells - Town Planning & Sustainable Development Consultants
- Lambert Smith Hampton
- Leeds Friends of the Earth
- Leeds Gypsy and Traveller Exchange
- Leith Planning Ltd
- Linden Homes
- Malcolm Bayliss
- Malcolm Scott Consultants
- Mark Wogden Architect
- Martin Walsh Associates
- McCarthy & Stone
- Metro
- Michael Hall Associates
- Miller Homes Limited – Yorkshire
- Mobile Operators Association
- MSS Architectural Design Services
- Nathaniel Lichfield & Partners
- National Farmers Union - North East
- National Federation of Gypsy Liason Groups
- National Trust
- Nature After Minerals (RSPB)
- Newmason Properties
- Nexus Planning Ltd
- NFU North East
- Nook Cottage
- Northern Trust
- Nuttal Yarwood and Partners
- Nuttall Yarwood And Partners
- Orion Homes
- P M Coote
- P N Bakes Architectural Consultancy
- Patchett Homes Ltd
- PB Planning Ltd
- PDS
- Peacock and Smith
- Permission Homes
- Permission Homes
- Peter Brett Associates
- Planinfo
- Planning Bureau
- Planning Matters
- Planning Potensial
- Planning Prospects Ltd
- Planware
- Provizion First Architecture
- Quod
- Quod
- Ramblers - Lower Wharfedale
- Ramblers Association, Bradford Group
- Rance Booth & Smith
- Randfield Associates
- Rapleys
- Rapleys LLP
- Renaissance Planning
- Rex, Procter & Partners
- Rollinson Planning Consultancy
- Rone Design
- Rone Design
- Royal Town Planning Institute
- Royal Town Planning Institute
- RPS Planning
- RSPB
- RSPB North England Region
- Rural Solutions Consulting
- Rural Yorkshire
- S R Design
- Sanderson Weatherall
- Savills

- Schofield Sweeney Solicitors
- Scott Wilson
- SDS Consultancy
- Sense of Space
- Spawforth Planning Associates
- Spawforths
- Sport England
- Sport England
- SSA Planning Limited
- Stainton Planning
- Steve Hesmond Halgh & Associates
- Stocksfield Construction Ltd
- Strategic Services
- Strutt & Parker
- Taylor Wimpey UK Limited
- The Arley Consulting Company Ltd
- The Courthouse Planning Consultancy
- The Craven Trust
- The Drawing Board (UK) Ltd
- The Garden History Society
- The Lawn Tennis Association
- The Planning Bureau Ltd
- The Salvation Army
- The Theatres Trust
- The Woodlands Trust
- Thomas Eggar
- Tony Plowman
- Turley Associates
- Vernon and Co
- Walker Morris
- Walker Morris
- Waller and Partners
- Walton & Co
- Watson Batty
- West Yorkshire Archaeology Advisory Service
- West Yorkshire Ecology
- White Young Green Planning
- WHP Wilkinson Helsby
- Woodhall Planning & Conservation
- Yorkshire Gardens Trust
- Yorkshire Greenspace Alliance
- Yorkshire Wildlife Trust
- Zero Architecture Ltd

SCI 4 – All Other Consultees and individuals that are not identified in the Planning Regulations (Postal Notification)

- A B Braithwaite
- A Botherway
- A Butters
- A C Heap
- A D Elsegood
- A L Holloway
- A Richardson
- A Waddington
- Adrian & Susan Hepton
- Aelred Monaghan
- Alan Bedggod
- Alan Black
- Alan Bland
- Alan Fearnley
- Alan Ramsey
- Alan S. Ferguson
- Alan Wintersgill
- Albert Edward Smith
- Alice Taylor
- Alison Franks

- Amanda Simmonds
- Andrew & Tracy Purcilue
- Andrew J Lambert
- Andrew Kevin Ibson
- Andrew Thorby
- Andy Hosking
- Anita Hampshire
- Ann Gill
- Ann Pratt
- Anna Barker
- Anne & Phil Harrison
- Anne Ferguson
- Anne Tupholme
- Annette Joyce
- Annette Shepard
- Anthea Fawdry
- Anthie Padden
- Astrid Hansen
- Audrey Brand
- Audrey Hairsine
- Audrey Hall
- B & A Phillips
- B & S Wilson
- B & W Clayton
- B Crowther
- B H Cussons
- Barbara Ann Morley & Phillip
Chinque
- Barbara Butterworth
- Barbara Hawthorne
- Barry Bruce
- Barry Gill
- Barry Hollingshead
- Barry K Gilman
- Berna White
- Brian Dickinson
- Brian Dobson
- Brian Goodal
- Brian Scott
- Brian Walker
- Bryony Page
- C & M.J Harrison
- C A Bycroft
- C Dobson
- C Gale
- C V Barton
- Carol Atkinson
- Carol Hall
- Carol Maufe
- Carole & Martin Woodgate
- Carole Ann Smith
- Carole Fearnley
- Caroline Harbron
- Catherine & Toshi Suzuki
- Catherine Bartle
- CD & KJ Lawn
- Celia Langan
- Charles Colburn
- Charles Thomspn
- Chris Davey
- Chris Morley
- Christine Foster
- Christopher & Susan Lewis
- Christopher Elliff
- Christopher Melville
- Clare Hemming
- Craig McKay
- Cynthia Blackburn
- Cynthia Diane Jowett
- D & PA Owen-Smith

- D C Chapman
- D Cartwright
- D H Robinson
- D P Gregery
- D Taylor
- Dale Cordingley
- Dan Jerwood
- David & Cherry Bartlett
- David & Isabelle Heap
- David & Jane Furness
- David & Margaret Howgate
- David & Mary Clegg
- David & Shelia Davies
- David & Sue Clayton
- David Archer
- David Blackburn
- David Dale
- David Hogg
- David Machin
- David Morton & Joy Wood
- David Slaney
- David Smith
- Denise & Graham Laycock
- Derrick & Dorothy Barker
- Diana Hogg
- Diane Bollen
- Donald & Judith Oliver
- Donald Cowburn
- Donald Wright
- Doreen Haigh
- Dorothea Drew
- Dorothy Ainsworth
- Dorothy Bexton
- Dorothy Buffey
- Dr John Paul Milnes
- Drew Cansfield
- E A Shepperd
- E Allan
- E Armstrong
- E L Scott
- E R Puodzuinas
- E R Waterhouse
- E Trueman
- Elaine Bailey
- Elaine Whitaker
- Elieen White
- Elizabeth & Andrew Milne
- Elizabeth Bennett
- Emma Holme
- Eric & Diane Smith
- Eric & Marjorie Marsh
- Eric & Sandra Robinson
- Eric Stow
- Eva Pinthus
- Evelyn C Miles
- Fiona Powell
- Frank Leonard
- Fred Keery
- G & R Wilkinson
- G & Z Parton
- G Nuttall
- G S Bromley
- G Wyness
- G Young
- Gail Baines
- Gareth Tattersall
- Gary Ware & Deborah Horrocks
- GE & JE Davis
- Geoffrey & Catherine Laycock
- Geoffrey Cawthra

- Geoffrey N Boyes
- Geoffrey Upton
- George Turner
- GI Watson
- Gill & Peter Holmes
- Gillian Rennison
- Glenda Cumberland
- Gordon & Adrienne Coventry
- Gordon Black
- Mrs Firth
- Gordon Wrightson
- Graeme Willson
- Graham Inskip
- Graham Jackson
- Graham Willson
- H Brown & D Pickles
- Hamish & Mavis Currie
- Harry & Moira Varo
- Hazel Grosset
- Helen Etwell
- Helen Rayworth
- Herbert & Joan Dobson
- Herbert Sutcliffe
- Howard Walker
- I D Galbraith
- Ian Howe
- Ian R. Henderson
- Ian Ross
- Ian Smith
- Ian Spafford
- Ian Thackray
- Irene Wheelhouse
- Iris Beyersdorff
- Iris H Westby
- J Botherway
- J Brownson
- J C Flanagan
- J C Wilson
- J Cooke
- J Corbybury
- J Driver
- J Garnsey
- J Hall
- J Petty
- J S Thornton
- J Smith
- J Whiteoak
- J.B.D. Wilcock
- Jacqueline River
- James Barry Somers
- James Ellison
- James Watson
- Jamir Vaddin
- Jane Dresser
- Janet & Paul Lawreniuk
- Janet Foreman & Nick Lightband
- Janet Quinn
- Janet Robershaw
- Jayne Sands
- Jean Morris
- Jean Ainsworth
- Jean Clay
- Jean Hahn
- Jean Holmes
- Jean Ince
- Jean Jones
- Jean Lawn
- Jean Longley
- Jean Mathieson
- Jean Slaney

- Jean Wrightson
- Jeanette Alderman
- Jennifer Nelson
- Jenny Wholley
- Jill Ferguson
- Jill Kealey
- Joan Thomas
- Joan Wright
- Joanna Rodwell
- Joanna Tansley & Philip Calvert
- Joanne Besford & Tony Zacharczuk
- John & Carol Dixon
- John & Jacqueline Devereux
- John Barrett
- John Barry Metcalf
- John Briggs
- John Bromley
- John Grosset
- John Hawthorne
- John Hugh Hawkesworth
- John Hutchinson
- John Pickering
- John Richard Thackray
- John Wheeler
- John Wilkinson
- Jonathan Saynor
- Josephine Vento
- Judith A. Bryan
- Judith Smith
- Julia Gill
- Julia M Thomas
- Julia Smith
- Julian & Christine Holdsworth
- Julian Barnes
- Julie Hart
- Julie Newbould
- Julie Spiller
- June Barker
- K M Pumar
- Karen Taylor
- Kath & Fred Grint
- Katherine Watson
- Kathleen Adams
- Kathleen Balfour
- Kathleen R May
- Keith Bell
- Keith Budd
- Keith Jagger
- Kenneth & Elizabeth Hubbard
- Kenneth Cumberland
- Kym Platts
- L Ashington & M Evans
- Lara Crawford
- Lawrence Butterfield
- Leich Holmes
- Lesley Barnes
- Lesley Hutchinson
- Lesley Latham
- Leslie Wright
- Lilian Brown
- Lillian Knight
- Linda Carter
- Linda Davies
- Lisa Bowden
- Liz Taylor
- Louise Priestley
- Lucy Ingham
- Lynne Burnett
- M E York

- M Forrest
- M Ingleson
- M L Eyres
- M Towler
- M Turner
- Malcolm Grice
- Malcolm Whitehouse
- Mandy Holmes
- Margaret Holmes
- Margaret Polley
- Margot Dalton
- Marilyn Hart
- Marjorie Hickson
- Mark Jagger
- Mark Taylor
- Marlene & Donald Throup
- Martin B Fox
- Martin Fox
- Martin Spiers
- Mary Robinson
- Matthew Dawson
- Matthew Thorp
- Maureen Bradley
- Maureen Green
- Maureen Ingham
- Maureen Smith
- Mavis Thornton
- May Hill
- Megan Steele
- Melvyn Oates
- Michael & Kathryn Forrest
- Michael J Monkman
- Michael Kosschuk
- Michael Ovari
- Michael Richardson
- Michael Timmons
- Mick & Zoe Brook
- Millicent & Jose Foster
- Miss Christine Robertson
- Miss J Birch
- Miss Rebecca Wright
- Miss S L Drinkwater
- Moira Stanhope
- Mollie Summersgill
- Mr & Mrs A Roper
- Mr & Mrs A Sands
- Mr & Mrs A. Charlesworth
- Mr & Mrs Alden
- Mr & Mrs B Tyler
- Mr & Mrs C Bannister
- Mr & Mrs C Green
- Mr & Mrs Coates
- Mr & Mrs Crabtree
- Mr & Mrs D A Robinson
- Mr & Mrs D Burke
- Mr & Mrs D N Foster
- Mr & Mrs El Abdli
- Mr & Mrs F C Rawlings
- Mr & Mrs Filligan
- Mr & Mrs G Long
- Mr & Mrs G Whitaker
- Mr & Mrs Gregory
- Mr & Mrs Hall
- Mr & Mrs Holdsworth
- Mr & Mrs Hopps
- Mr & Mrs Horsfield
- Mr & Mrs Hutchinson
- Mr & Mrs Ive
- Mr & Mrs J Green
- Mr & Mrs J Vincent

- Mr & Mrs JW Smith
- Mr & Mrs K Webster
- Mr & Mrs Lloyd
- Mr & Mrs Lumb
- Mr & Mrs Milne
- Mr & Mrs Murphy
- Mr & Mrs Penn
- Mr & Mrs R Iles
- Mr & Mrs R Ormondroyd
- Mr & Mrs R. Jenkins
- Mr & Mrs Renaldson
- Mr & Mrs S Town
- Mr & Mrs Smith
- Mr & Mrs W Birch
- Mr & Mrs Weatherill
- Mr & Mrs Whitaker
- Mr A B. Bridgen
- Mr A C McKay
- Mr A J Richardson
- Mr A King
- Mr A M Craven
- Mr B Slater
- Mr C Narrainen
- Mr CE & Mrs JM McCaig
- Mr D R Sayers
- Mr Eugene Driver & Mrs IE Barker
- Mr G Rubani
- Mr GW & Mrs KF Best
- Mr J K Clapham
- Mr J Nash
- Mr J P Blackburn
- Mr J Sunderland
- Mr K & Mrs D Burton
- Mr K Walker
- Mr L Clayton
- Mr M Boocock
- Mr Michael Smith
- Mr N. A. Harrison
- Mr P Bower
- Mr P Tallett
- Mr R W Rushforth
- Mr R. S. Watson
- Mr S Carridice
- Mr S J Briggs
- Mr S Snook
- Mr T & Mrs J Matthews
- Mr T Bendrien
- Mr T Waygood
- Mr Vallance & Mrs Gillian Fraser
- Mr W Edmondson
- Mrs & Mrs Lawreniuk
- Mrs A Bennett
- Mrs A Booth
- Mrs A J Bradford
- Mrs A Wasser
- Mrs Anne Turner
- Mrs B Irving
- Mrs B Smith
- Mrs B.M. Hudson
- Mrs C Dibb
- Mrs C J Richardson
- Mrs C Stanley
- Mrs D A Cayhill
- Mrs D Butterworth
- Mrs D Caton
- Mrs D Hilton-Stead
- Mrs D Stallard
- Mrs D Wilson
- Mrs Dorothy Isaac
- Mrs E A Brown

- Mrs E Booth & Ms M Booth
- Mrs E Greenwood
- Mrs E Kershaw
- Mrs F Clapham
- Mrs F E Halsall
- Mrs F Pratt
- Mrs FM Harrison
- Mrs G M Carridice
- Mrs H.E Atkinson
- Mrs J Boundy
- Mrs J Crellin
- Mrs J Crowther
- Mrs J G Ransome
- Mrs J Galbraith
- Mrs J Hamilton
- Mrs J Naylor
- Mrs J P Scurrah
- Mrs J Place
- Mrs J Smithson
- Mrs J. Luxford
- Mrs Jacqueline Yeadon & Mr Alan
Cartwright
- Mrs JM Tetley
- Mrs Joan Parrington
- Mrs K M Kirk
- Mrs K W Carson
- Mrs L Baron
- Mrs L Humphreys
- Mrs L Sayers
- Mrs M Earp
- Mrs M Gadd
- Mrs M Grant
- Mrs M McNamara
- Mrs M Richardson
- Mrs M. Hamflett
- Mrs M. Parish
- Mrs P J Pickles
- Mrs P Kellett
- Mrs P M Faulkner
- Mrs P M Quick
- Mrs P Sykes
- Mrs R Bond
- Mrs S Bunton
- Mrs S Foster
- Mrs S G Baird
- Mrs S Levey
- Mrs S Newbould
- Mrs S Poole
- Mrs S Rhodes
- Mrs S Winter
- Mrs T Charlesworth
- Mrs V Dickinson
- Ms J Reynolds
- Ms J. Wheeler
- N Gammon
- N Moore
- N Wild
- Nicholas & Susan Simpson
- Nicholas Smith
- Nicola Peel
- Nicola Thompson
- Nicola Watson
- Nigel Butterfield
- Nigel Slimming
- Noel & Lisa Stephenson
- O Sharpe
- P Casey
- P Cooke
- P J Lanfranchi
- P M Jodd

- P Stewart
- Pamela Brown
- Pamela Collins
- Pamela Riley
- Patricia M Byrne
- Pat Fisher
- Patricia & Brian Murgatroyd
- Patricia Driver
- Patricia Jewitt
- Patricia McKay
- Patricia Nicholson
- Patricia Waterhouse
- Patrick Watson
- Paul Bexton
- Paul Birch
- Paul Latham
- Paul Smith
- Paul Thirkettle
- Paula Padgett
- Paula Smith
- Pauline Benson
- Pay Eyres
- Penny Thorp
- Penny Trepka
- Peter & Joyce Rossington
- Peter Clayton
- Peter Ferguson
- Peter John Rae
- Peter Wigglesworth
- Philip Dawson
- Philippa Monaghan
- R H Baker
- R H Dinsdale
- R H Jones
- R Marshall
- R Troth
- R Walker
- Rachel Fuller
- Rachel McKay
- Ray Gledhill
- Revd John Nowell
- Richard & Jennie Buckley
- Richard Brook
- Richard Pilsworth
- Richard Rodgers
- Richard Southern
- Richard Walton
- Rita Munton
- Rob Hirst
- Robert & Jackie Taylor
- Robert Malley
- Robert Priestley
- Robert Raisterick
- Robert Wakerley
- Robin Johnson
- Roger Parker
- Roger Slingsby
- Roger Vanham
- Rosalind V Gachson
- Rosemary Jeeps
- Ross McGibbon
- Ruth Shaw
- S M Dickerson
- S Phelps
- S Pickles
- Sally Nicholson
- Sally Varley
- Salma Ahmed
- Samantha Holden
- Sandra Maria Walton

- Sarah Farman
- Sarah Makin
- Shan Veasey
- Sharon McGowan
- Sharon Priestley
- Shauna & Robert Banks
- Shelagh Lumsden
- Sheila & David Brook
- Sheila M Boyes
- Sheila Nurse
- Sheila Wright
- Simon P. Dugdale
- Stephen & Linda Palmer
- Stephen Johnson
- Stephen McNamara
- Stephen Town
- Stephen Wilkinson & Karen Higgins
- Steve Narey
- Stuart & Anne Dawson
- Sue Varley
- Susan Bentham
- Susan Gold
- Susan Watson
- Suzanne F. Atkinson
- Sylvia Mann
- Sylvia May Somers
- T D Ashall
- T. M. Hackett
- Terry Robinson
- Tessa Faulkner
- Theodore Feguson
- Tim Fawdry
- Tom Cockerham
- Tom Jones
- Tony & Ronwell Mitchell
- Trevor Bland
- Trevor Parry
- Trevor Taylor
- Tristina Brown
- V Brown
- V Fisher
- Vanessa Barry
- Vanessa Pheasey
- Vera Nicholson
- Veronica Carrington
- Victoria Cierpiol
- Victoria Smith
- Vivien Burke
- VM Franklin
- W E Evans
- W P Hawkesworth
- W Stephenson
- Wayne Robertshaw
- Wilfred Shaw
- William E Pratt
- William Hammill
- William Horsley
- William K Fisher & Maura Fisher Peake
- William Summersgill
- Y W Cunningham
- Zoe Carroll

SCI 4 – All Other Consultees and individuals that are not identified in the Planning Regulations (Email Notification)

- 5 MPs
- CBMDC Bradford Councillors (2015-2016)
- A E Jones
- AA Wood & E Kendal-Wood
- Adrian & Jackie Heath
- Adrian Hall
- Adrian Long
- Adrian Weatherly
- Alan & Barbara Haigh
- Alan Chandler
- Alan D. Elsegood
- Alan Davies
- Alan Fretwell
- Alan Grange
- Alan Mainwaring
- Alan Sadler
- Alan Scott
- Alan Taylor
- Alan Wilcock
- Alastair Sim
- Albert King
- Alison Charnock
- Alison Clarke
- Alison Jack
- Alison Roe
- Alison Whitehouse
- Alistair Tuxworth
- Alwyn Coar
- Amanda Labbett
- Andrew & Maureen Clark
- Andrew & Jennifer Dean
- Andrew Carey
- Andrew Carter
- Andrew Cawthray & Aimee Coltman
- Andrew Coates
- Andrew Ellison
- Andrew Henderson
- Andrew Ibbotson
- Andrew Lund
- Andrew Robertshaw
- Andrew Stuart
- Andrew Thorlby
- Andrew Whitman
- Andy Eastham
- Andy Marshall
- Andy Stuart
- Andy Taylor
- Angela Moulson
- Anglea Hill
- Ann Driver
- Ann Gadd
- Ann Gill
- Ann Peacock
- Ann Peacock
- Anna Hosking
- Anna Watson
- Anne Eady
- Anne Galloway
- Anne Hodgson
- Anne Jarvis
- Anne Sherriff
- Annette Hattersley

- Annette Mullen
- Anthony Barnet
- Anthony Gallagher
- Anthony Scott
- Anthony Silson
- Anthony Wadsworth
- Anthony Watson
- Anwar Mohammed
- Arie Boerrigter
- Ashley Forsyth
- Audrey Livett
- B D Gill
- B P Briggs
- Barbara Archer
- Barbara Carney
- Barbara Cussons
- Barbara Drake
- Barbara Hartley
- Barbara Howerska -& Mark Guest
- Barbara Thomas
- Barney Lerner
- Barry & Sue Overend
- Bernard Stone
- Betty Jeffrey
- Bev Greenall
- Beverley Roberts
- Beverly Brame
- Bill Ayton
- Bob Sproule
- Bob Watson
- Brenda Doran
- Brett Selby
- Brett Staley
- Brian Bateson
- Brian Brownutt
- Brian Clark
- Brian Hayes-Lewin
- Brian Moeller
- Brian Rhodes
- Brian Sayer
- Brian Walker
- Brian Whitaker
- Bridget Rout
- Bruce Barnes
- Bruce Piper
- Bryan & Susan Collins
- Bryan Rollason
- C & S Handley
- Carl Rodrigues
- Carol Aitken
- Carol Bell
- Carol Chilvers
- Carol Smith
- Carole Flowers
- Carole Krol
- Caroline Hyde
- Caroline Watson
- Caroline Wilson
- Caroline Wilson
- Carolyn Broadbent
- Cath Laycock
- Cath Rose
- Catherine Hall
- Catherine Meredith
- Ceri Lloyd
- Charles Cooper
- Charles Hall
- Charlotte Hobson
- Chas Stansfield
- Cherry Sudall

- Chris Battersby
- Chris Brown
- Chris Flecknoe
- Chris Jelley
- Chris Moore
- Chris O'Neill
- Chris Terry
- Chris Willetts
- Chris Wilson
- Christine Bousfield
- Christine Hardaker
- Christine Jones
- Christine Maden
- Christine Redhead
- Christine Robbins
- Christine Rowland
- Christine Went
- Christopher & Jennifer Solomon
- Christopher & Shirley Burns
- Christopher & Susan Johnson
- Christopher Holmes
- Christopher Kennedy
- Christopher Watson
- Ciaran Sundstrem
- Clare Ravenscroft
- Claudia Rickard
- Clive Nichol
- Clive Springle
- Clive Woods
- Cllr Anne Gillian Hawkesworth
- Cllr Martin Smith
- Cllr Richard Lewis
- Colin & Wendy Neville
- Colin Burn
- Colin Campbell (Cllr)
- Colin Child
- Colin Granby
- Colin Jolleys
- Colin Macdonald
- Colin Rowe
- Colin Shields
- Cora Andrews
- Councillor David Blackburn
- Craig Barnes
- Dan Smith
- Dan Stead
- Daniel Bridgeman
- Daniel Highton
- Daphne Dixon
- Darren Baines
- Dave Jasper
- Dave Rayner
- David & Tracy Sanderson
- David & Ursual Heath
- David Alexis
- David Archer
- David Austin
- David Barrett
- David Blackburn
- David Blackburn
- David Bland
- David Bloy
- David Borley
- David Bretherick
- David Brown
- David Brown
- David Bruce
- David Butler
- David Caswell
- David Colman

- David Craig
- David Downs
- David Garner
- David Griffiths
- David Hemsley
- David Hirst
- David Horne
- David J Hobson
- David J Howe
- David Jarvis
- David Jenkins
- David Kershaw
- David Lonsdale
- David Moncaster
- David Morgan Rees
- David Naylor
- David Newbould
- David Pilsworth
- David Richards
- David Richards
- David Robertshaw
- David Runton
- David Scholefield
- David Shoesmith
- David Smith
- David Starkey
- David Stead
- David Sudall
- David Wadsworth
- David Weatherhead
- David Wilson
- David Winward
- David Wood
- Dean Horsman
- Debbie Davies
- Debbie Ellison
- Debbie Holland
- Debbie Holmes
- Deborah Ingleson
- Deirdre Collier
- Delphine Dorgu
- Denise Ledgerwood
- Denise Taylor
- Denys Hainsworth
- Derek Markham
- Diane Royston
- Dilys Clark
- Dominic Collis
- Dominic Haslam & Anna Ashelford
- Doug Pratt
- Douglas S Brook
- Dr Denise Taylor
- Duncan Garfield
- Edward Harvey
- Elaine Hanson
- Elaine Pearson
- Elaine Sadler
- Elaine Shoesmith
- Elizabeth Edgington
- Elizabeth Nutter
- Elizabeth Whiteside
- Elizabeth Wilson
- Elizabeth Winterburn
- Ellen Macpherson
- Ellen Zito
- Emma Hinkles
- Emma Moscrop
- Ena Mercy
- Eric Beasley

- Eric Jeffrey
- Eric Rawcliffe
- Farid Meleki
- Faye Bland
- Fiona & Andrew Mann
- Frances Griffin
- Frances Horne
- Frances McLachlan
- Frank Kirk
- Frank Ollerenshaw
- Frank Taylor
- Gail Sudall
- Gareth Brown
- Gareth Orchard
- Garry
- Gary Copping
- Gary Creighton
- Gary Robertson
- Gennine Worrallo
- Geoff Best
- Geoff Killock
- Geoff Tupholme
- Geoffrey & Mollie Harrison
- Geoffrey Dean
- Geoffrey Downs
- Geoffrey Hale
- Geoffrey Harrison
- Geoffrey Home
- George Gamble
- George Sharp
- Gerald Barker
- Geraldine Winward
- Geraldine Woodhead
- Gerard Downes
- Gill Bateman
- Gill Cartwright
- Gill Taylor
- Gillian Coughlan
- Gilly Hoyle
- Glenn & Helen Miller
- Glyn Brown
- Glynn Jones
- Glynnis Coates
- Gordon Dey
- Graeme Tiffany
- Graham Peacock
- Graham Smith
- Grahame Hawkings
- Greg Kravtshuk
- Gwendoline Harris
- Gwyn Llewellyn
- Gwyneth Wilcock
- Hannah Cummins
- Harriet Wood
- Harry Ognall
- Harvey Bosomworth
- Harvey Crowther
- Hazel Goulden
- Heather Cook
- Heather Sharp
- Helen Brown
- Helen Jacques
- Helen Kidman
- Helen Miller
- Helen Whitman
- Helen Willetts
- Helena Hunter
- Hilary Boon
- Hilary Finnigan
- Hilary Thomas & Donald Porritt

- Hilary Thorniley-Walker
- Howard Jenson
- Howard Metcalf
- I Ahmed
- Iain Maden
- Ian & Kate Naylor
- Ian & Lisa Dowson
- Ian & Mags Pearson
- Ian Bingham
- Ian Henderson
- Ian Ledgerwood
- Ian Lyle
- Ian Palmer
- Ian Park
- Indy Athwal
- Irfan Siddiqi
- Isabella Roughley
- Isobel Burgess
- J & B Hey
- J M Rix
- J S Blessington
- Jack Dixon
- Jack Rickard
- Jack Soaring
- Jackie Shepherd
- Jacqueline Sedlak
- Jacqueline Thompson
- Jag Picknett
- James Bennett
- James Grimley
- James McCormack
- James Reddington
- James Williams
- Jan & Lennox Towers
- Jan & Steve Pickles
- Jan Hinchcliffe
- Jan Stallworthy
- Jane Cockcroft
- Jane Dobbie
- Jane Harrison
- Jane Leach
- Jane Ogston
- Jane Parkinson
- Jane Pearson
- Janet Cade
- Janet Carter
- Janet Harvey
- Janet Petty
- Janet Warrior
- Jaqueline Ruth MacKenszie
- Jaqueline Ruth MacKenszie
- Jason Aldiss
- Jason Ashworth
- Jason Beckett
- Jason Stowe
- Jason Taylor
- Jayne Bennett
- Jayne Wood
- Jean & Roy Margerison
- Jean Hill
- Jean Holdgate
- Jean Langtry
- Jeffrey Green
- Jeffrey Thelwell
- Jen White
- Jennifer Soloman
- Jeremy & Carole Windle
- Jeremy & Julia Hayhurst
- Jessica J Smith
- Jill Gilholme ·& Mark Kelly

- Jill Hirst
- Jill Taylor
- Jillian Clayton & David Earley
- Jillian Dance
- Jillian Gilpin
- Jim Adams
- Joan Henderson
- Joanna Parker
- Joanne Angus
- Joanne Barran
- Joanne Jackson
- Joe Kemp
- Joe Varga
- John & Barbara Bramley
- John & Dianne Griffiths
- John & Judith Bolland
- John & Judy Bolland
- John & Louise Hobson
- John B Gambles
- John Bradshaw
- John Bray
- John Bretherick
- John C Churchman
- John Christian
- John Clarke
- John Cleland
- John Crosse
- John D. Anderson
- John D. Pratt
- John England
- John Finnigan
- John G Collins
- John Geoff Hill
- John Gilpin
- John Gledhill
- John Hanson
- John Harrison
- John Holmes
- John Huff
- John Hutchinson
- John Huxley
- John Inskip
- John Jewitt
- John Kane
- John McKenzie
- John Morrell
- John Muchlinski
- John Muddiman
- John Naylor
- John Pickersgill
- John Sharrock
- John Sudall
- John Symons
- John Tempest
- John Watmuff
- John Woodhead
- John Wright
- Jonathan Grundy
- Jonathan Cove
- Jonathan Farman
- Jonathan Gadd
- Jonathan Philips
- Jonathan Thacker
- Jonathan White
- Jonathan Wilkinson
- Jordon Ormondroyd
- Josephine Bell
- Joyce Dykes
- Joyce Newton
- Joyce Priestley

- Juanita Fenton
- Judi Sture
- Judith Caunt
- Judith Gibson
- Judith Hartley
- Judith Warner
- Judith Warr
- Judy Cunnington
- Julian Carter
- Julian Green
- Julie Ashworth
- Julie Cooper
- Julie Hodgson
- Julie Rasimowicz
- Julie Tynes
- Juliet Green
- June Naylor
- June Newell
- K Knappett
- KA & CE Willis
- Karen Carney
- Karen Casson
- Karen Greenhough
- Karen Moore
- Karen Pollard
- Karl & Angela Lavery
- Karl Payne
- Kate Bothamley
- Kate Brown
- Kate Brown
- Kate Corby
- Kate Graham
- Kate Langton
- Kate Sewell
- Kath McGee
- Katherine Cullen
- Kathleen Brown
- Kathleen Vann
- Kathryn Hardeman
- Kay Kirkham
- Keith & Tracey Revis
- Kelly Ison
- Ken & Julie Duckworth
- Ken Pearson
- Kerry Watson
- Kester Loy
- Kevin Dixon
- Kevin Smith
- Kevin Waters
- Kirsten Huby
- Kurt Kunz
- Laura Haworth
- Lavinia Nicholls
- Lee Smith
- Leigh East
- Les & Shirley Burrows
- Lesley Beebe
- Lesley Bosomworth
- Linda Hicking
- Linda Marshall-Scurrah
- Lisa Baker
- Liz Johnson
- Lois Skilleter
- Louisa Parry
- Louise Cox
- Louise Larking
- Louise Nash
- Louise Skelton
- Lucia Smith
- Lucy Fox

- Lucy Fox
- Lucy Johnson
- Lucy Lowe
- Lucy Pickard
- Lynda Rollason
- Lynn Airton
- Lynn Asquith
- Lynne Faulkes
- Lynnette Cadamarteri
- M W Rickaby
- Malcolm Balmforth
- Malcolm Bayliss
- Malcolm Bentley
- Mandy Stevens
- Maralynne Clayton
- Margaret Bradshaw
- Margaret Core
- Margaret Waugh
- Maria Solomon
- Marianne Curtis
- Mark & Rebecca Mon-Williams
- Mark & Susan Tyson
- Mark Busby
- Mark Mangano
- Mark Priestley
- Mark Robinson
- Mark Turner
- Martin Bennett
- Martin Page
- Martin Sinclair
- Martin Smith
- Martin Smith
- Mary Hennessey
- Mary Hill
- Mary Robershaw
- Mary Roche
- Matt & Kate Wilde
- Matt Stocks
- Matthew & Emma Yates
- Matthew Brooker
- Matthew Hayball
- Matthew Hydleman
- Matthew Twigger
- Maureen Crossley
- Maureen Harris
- Maurice William
- Melaine Addis
- Melissa Dennison
- Michael Baldwin
- Michael Branford
- Michael Dankowycz
- Michael Goodliffe
- Michael John Emmett
- Michael Long
- Michael Moran
- Michael Ogilvy
- Michael Parkin
- Michael Parsons
- Michael Pilling
- Michael Richardson
- Michael Woodman
- Michelle Victor
- Michelle Ward
- Michelle Whitaker
- Mick
- Mick Thompson
- Mike Dando
- Mike J Taylor
- Mike McQuaid
- Miles Timperley

- Miranda Armitage
- Miranda Armitage
- Mr & Mrs Ashworth
- Mr & Mrs Brook
- Mr & Mrs D Aaron
- Mr & Mrs G.K. Ashworth
- Mr & Mrs Ivor Stevens
- Mr & Mrs Parsons
- Mr H Cusworth
- Mr J Varley
- Mr K Duesbery
- Mrs A M Armstrong
- Mrs E. Morrell
- Mrs Helen Hodgson
- Mrs L Bennett
- Mrs S Lane
- N. Wadie
- Neil Baldwin
- Neil Wells
- Neil Whitaker
- Neil Wrathmell
- Nichola Geale
- Nicholas Briggs
- Nicholas Pennington
- Nick Trenaman
- Nicola Woodman
- Nicolas de Siqueira
- Nicolas Desiqueira
- Nigel Brokker
- Nigel Rabbage
- Nigel Sharp
- Noel & Margaret Bailey
- Norma Scott
- Norman Scarth
- Oliver & Kate Sykes
- Oliver Anderson
- Olivia Gilpin
- Pamela Drury
- Pamela Rae
- Pamela Walker
- Pat Coote
- Pat Limb
- Patricia Smith
- Patrick Hickie
- Patrick Smith
- Paul Avery
- Paul Barratt
- Paul Gott
- Paul Hall
- Paul Kendall
- Paul Kirkman
- Paul Leeming
- Paul Leeming
- Paul Liddle
- Paul Murphy
- Paul Slingsby
- Paul Thackray
- Paul Worthington
- Pauline Wood
- Penny North-Lewis & Richard Coverdale
- Penny Richards
- Pete Thomas
- Peter & Dorothy Wilkinson
- Peter Barton
- Peter Bastow
- Peter Carruthers
- Peter Ford
- Peter Goldsbrough
- Peter Harvey

- Peter Huby
- Peter Jenkins
- Peter Ketley
- Peter Knappett
- Peter Navotni
- Peter Redhead
- Peter Shirt
- Peter Smith
- Peter Wilkinson
- Peter Williams
- Phil Benson
- Phil Whieldon
- Philip Ashton
- Philip Barker
- Philip Garbutt
- Philip Petty
- Philip Read
- Philip Sharp
- Phillipa Taylor
- Pierre Richterich
- Pippa Eastham
- Polly Hosking
- Prudence Bray
- R Dawson
- Rachel Barker
- Rachel Bennett
- Rachel Carter
- Rachel Kerr
- Ralph Pemberton
- Ray Andrews
- Ray Bell
- Ray Graham
- Ray Marshall
- Ray Wilkes
- Rebecca Barron
- Rebecca Taylor
- Rebecca Wheatley
- Rebecca Whitaker
- Richard Askham
- Richard Barran
- Richard Blenkinsop
- Richard Bly
- Richard Eakin
- Richard Fox
- Richard Hayton
- Richard Hedges
- Richard Lowe
- Richard Pinchbeck
- Richard Pollard
- Rita Farmer
- Robert & Elizabeth Willey
- Robert Jackson
- Robert Yorke
- Robin Naylor
- Rodney Brooke
- Rodney Mattock
- Roger & Joanne Wilson
- Roger & Susan Orriss
- Roger Carroll
- Roger Carroll
- Roger Goulden
- Roger Raper
- Roger Varley
- Ronald Smith
- Ronnie Bagdonavicius
- Ros Brown
- Rosalind Dawson
- Ruth Hill
- S Redhead
- Sajid Hussain

- Sam Atkins
- Samantha Borley
- Samuel Greenhough
- Samuel MacDougall
- Sandra Brown
- Santosh Mehmi
- Sara Dawe
- Sharon Callaghan
- Sharon Grundy
- Sheila Carrurthers
- Sheila Robinson
- Sheila Wright
- Shelagh Patrick
- Shirin Borrett
- Shirley Thompson
- Shirley Thompson
- Sima Patel
- Simon & Jane Foers
- Simon Archer
- Simon Balding
- Simon Boon
- Simon Callaghan
- Simon East
- Simon Holdsworth
- Simon Kenyon
- Simon Lewis
- Simon Myres
- Simon Paxford
- Simon Warner
- Ste Drye
- Stef Nykolajczuk
- Stella Casserley
- Stephanie Bryden
- Stephanie Calvert-Smith
- Stephen & Judith Wolstenhulme
- Stephen Blott
- Stephen Butler
- Stephen Corbett
- Stephen Kelly
- Stephen Lewis
- Stephen Mann
- Stephen Wood
- Steve & Donna Harrison
- Steve Davie
- Steve Gambill
- Steve Mould
- Steve Risdon
- Steve Spoerry
- Steve Wortner-Smith
- Steven Haley
- Steven Kellett
- Steven Longstaff
- Stuart Andrew MP
- Stuart Netherwood
- Stuart Perry
- Stuart Robinson
- Sue Baker
- Sue Barker
- Sue Downs
- Sue Grimley
- Sue Maddison
- Sue Priestley
- Sue Rix
- Sue Wright
- Susan & Bruce Honeyman
- Susan Field
- Susan Griffiths
- Susan Ince
- Susan Mitchell
- Susan Moore

Core Strategy DPD: Proposed Main Modifications
Statement of Consultation (2016)

- Susan Piper
- Susan Ryan
- Susan Simpson
- Susan Thornton
- Susan Walker
- Sylvia Hesp
- Sylvia Walker
- Terance Hennessay
- Terence Hainsworth
- Terrence O'Hara
- Terry Brown
- Terry Brown
- Terry Farrer
- Thomas Sergent
- Thomas Smith
- Tim Bennett
- Tim Draper
- Tim Hestletine
- Tom Barrett
- Tom Pollard
- Tony & Eileen Payne
- Tony Caunt
- Tony Dexter
- Tony Holmes
- Tony Kemp
- Tony Mitchell
- Tony Woods
- Tracey Revis
- Trevor Riley
- Trevor Storr
- Trish Lambert
- Trudi Longbottom
- Val Grunwell
- Valerie Degnan
- Valerie Horner
- Valerie James
- Vanessa Wellock
- Vera Swaine
- Vicki Griffith
- Vicky Kaye
- Vicky McGee
- Victor Sedlak
- Victoria Barker
- Victoria Pickering
- Victoria Turland
- Vince Butler
- Vivian Cray
- Wendy Brooke
- Will Martin
- Willaiam Leather
- William Bogaardt
- William Horner
- William Miller
- William Patterson
- Yvette Guy

Appendix 3: Consultation Letter

Department of Regeneration

Development Plans
2nd Floor (South) Jacobs Well
Nelson Street
Bradford
BD1 5RW

Tel: (01274) 433679

Email: planning.policy@bradford.gov.uk

Date: Monday 23rd November 2015

**Local Plan for the Bradford District
Core Strategy Development Plan Document - Proposed Main Modifications**

Dear Sir / Madam,

I am writing to you as a statutory consultee or because of your previous interest in the Local Plan for the Bradford District. As a result of an Examination in Public of the Core Strategy a number of changes are proposed to make the document and its policies "sound". The changes are set out in the Proposed Main Modifications Schedule.

Your comments are invited on these Proposed Main Modifications. The period for consultation runs for 8 weeks until Wednesday 20th January 2016 (4pm).

The Proposed Main Modifications Schedule has been subject to the following assessments: Sustainability Appraisal, and Habitat Regulations Assessment, Equality Impact Assessment and Health Impact Assessment.

Availability of Documents

The Proposed Main Modifications Schedule and supporting documents are available to view on the Council's website at: www.bradford.gov.uk/planningpolicy.

Reference copies of the following documents are available for inspection at the deposit locations listed below:

- **Core Strategy Proposed Main Modifications Schedule** (*Subject of the consultation*)
- Core Strategy Proposed Additional Modifications Schedule
- Sustainability Appraisal
- Habitats Regulations Assessment
- Equality Impact Assessment
- Health Impact Assessment
- Gypsy and Traveller Accommodation Assessment (July 2015)
- Habitats Regulations Assessment Review (November 2015)
- Statement of Representations Procedure
- Frequently Asked Questions sheet



Deposit Locations

- CBMDC Principal Planning Office: Jacob's Well, Bradford, BD1 5RW.
- CBMDC libraries: Bradford Local Studies Library, Bradford City Library, Bingley, Keighley and Ilkley.
- Town Halls & One Stop Shops: Shipley, Keighley and *Ilkley (**By appointment only*).

Should you have any further queries about the Core Strategy or the examination process please contact a member of the Development Plans team by E-mail on planning.policy@bradford.gov.uk or telephone (01274) 433679.

Yours faithfully,



Andrew Marshall
Planning & Transport Strategy Manager

Appendix 4: Extracts from local news relating to the consultation

Infrastructure fears over planned houses

By Herald reporter

news@cravenherald.co.uk

FEARS have been expressed about huge infrastructure costs that could result from an increase in the number of new houses planned for Slisden.

Changes to Bradford Council's Local Plan core strategy, which sets out how the district's land will be used during coming years, are now subject to public consultation.

The number of new houses allocated to Slisden as part of this plan is 1,200, up by 200 from the initial draft of the Local Plan.

People can now have their say on the changes, and the document will guide where houses, businesses and leisure and retail developments are built for the next 10 to 20 years.

But concerns are growing as

to how Slisden can cope with this extra development.

Craven ward councillor Adrian Naylor said: "This will have a massive impact on the town."

"If these new houses are built, Slisden will grow by a bigger percentage than any other place in the district outside the centre of Bradford."

"I'd encourage everyone to comment on the revised plans. But people are being asked to comment on the increased number of houses without knowing where those houses will go."

"Also, what is missing from all of this is detailed analysis of where new infrastructure is needed, who will pay for it and when it will arrive."

"Northern Power Grid has said that if more than 100 houses are built in Slisden, it will need to increase the size of its

electricity substation, which will cost another £5 million.

"Yorkshire Water says the Aire Valley trunk sewer is at capacity and would need to be upgraded to take additional housing."

"Some of these infrastructure projects will only be delivered 10 to 15 years from now, while new housing could be developed a lot sooner than that."

The core strategy of the Local Plan was submitted to the Government almost a year ago, and hearings followed in March resulting in the current changes. Consultation on the changes runs for the next eight weeks.

Documents showing the proposed changes, together with the reasons for them, are available at main council offices and main libraries.

They are also available online at bradford.gov.uk/ldf

Resignation creates vacancy at council

SKIPTON Town Council is likely to hold a by-election following the resignation of Cllr James Paton.

Cllr Paton, who was one of four councillors to represent Skipton North, was the only Green Party member on the council.

He was elected at the May local elections and resigned earlier this month.

His resignation has created a 'casual vacancy' on the council, which will have to be filled through a by-election if a request is received by at least ten people eligible to vote in Skipton North. The deadline for requests was yesterday.

Council leader Cllr Chris Harbon paid tribute to Cllr Paton at last week's full meeting of the council, thanking him for his work.

Plug in with

WAS £679.99
BLACK FRIDAY PRICE ONLY 20% OFF THIS PRICE
£499.99

AEG
L60450VFL
1400rpm Washer
Big Load
Clean Act™



SAVE £100

WAS £399.99
BLACK FRIDAY PRICE ONLY 6 AVAILABLE @ THIS PRICE
£299.99

NEW WORLD
NW601GSTA
8.1m Single
Geo Open
Starline Steel



SAVE £100

WAS £369.99
BLACK FRIDAY PRICE ONLY 6 AVAILABLE @ THIS PRICE
£269.99

WAS £279.99
BLACK FRIDAY PRICE AMAZING PRICE!
£279.99

Boose
SOLO

TV Sound System
For TVs
up to 42cm
Screen Size



SAVE £70

WAS £249.99
BLACK FRIDAY PRICE + MASSIVE SAVINGS ON LIFESTYLE SYSTEMS
£279.99

PURE
Evoko D2
Rob Ryan Design
Bluetooth Portable
Digital Radio
Available in Blue
or Red



SAVE £30

WAS £119.99
BLACK FRIDAY PRICE ONLY 8 IN EACH COLOUR @ THIS PRICE
£89.99

HARRY GARLICK

www.harrygarlick.co.uk



26 High St
Skipton
0800 206 2155

1 Church St
Barnoldswick
0800 206 2150

QSEARCH

REGISTER SIGN IN

Twitter Facebook

Bradford 11.5°C

Telegraph & Argus

NEWS SPORT OPINION BUSINESS WHAT'S ON JOBS PROPERTY ANNOUNCEMENTS CARS

News Local National Crime Education Health Events Behind the News School Awards 2016 Community Stars Broadway Development

Have your say on latest development blueprint for Bradford district



Have your say on latest development blueprint for Bradford district



Claire Wilde, City Hall Reporter // News

Share [Facebook] [Twitter] [Email] [Print]

0 comments

PEOPLE are being urged to have their say on the latest version of a development blueprint for the whole district.

The Local Plan will guide where houses, businesses and leisure and retail developments will be built over the next 15 years.

The overall number of new homes needed in Bradford district by 2030 remains the same at 42,100 in the latest draft, but some areas will have more homes, while others will have fewer.

The plan's Core Strategy was examined by independent Government inspector Stephen Pratt, and Bradford Council has tweaked the proposals as a result of the hearings.

The documents can be viewed online at bradford.gov.uk/ldf or in person at the main libraries in [Keighley](#), [Ilkley](#), [Bingley](#) and Bradford as well as some Council offices, including [Shipley Town Hall](#).

Comments can be submitted online, emailed to planning.policy@bradford.gov.uk or sent by post to: Local Plan Group, City of Bradford Metropolitan District Council, 2nd Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW.

The consultation runs until until Wednesday, January 20.

Share article

[Facebook] [Twitter] [Email] [Print]

Keep in touch with local news

Sign up for email alerts

Send your news, pictures & videos

Most Popular

[More stories](#)


Your local area >

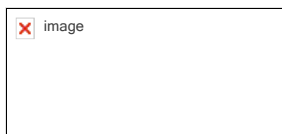
Ads by Google

New LG G4 - Just Launched

Shoot Stunning Photos Like a Pro With The New G4's Incredible Camera
www.lg.com/G4

Promoted Stories

[Mobile site](#) [Contact Us](#) [Subscribe](#) [Photo](#)
[Sales](#) [Advertise](#) [AdChoices](#) 
[Archive and Mart](#) [Topics](#) [Announcements](#) [Site Map](#) [Exchange](#)
[Dating](#)



Have your say on latest development blueprint for Bradford district

[Sign in](#) or [Register](#) to leave a comment and/or receive comment alerts.

[Terms & Conditions](#) [Contributor Terms](#) [Cookie Policy](#) [Privacy Policy](#) ©Copyright 2001-2015
This site is part of Newsquest's audited local newspaper network | A Gannett Company
Newsquest (Yorkshire & North East) Ltd, Loudwater Mill, Station Road, High Wycombe, Buckinghamshire. HP10 9TY [3223515] Registered in England & Wales

IPSO This website and associated newspapers adhere to the Independent Press Standards Organisation's Editors' Code of Practice. If you have a complaint about the editorial content which relates to inaccuracy or intrusion, then please contact the editor here. If you are dissatisfied with the response provided you can contact IPSO here
REGULATED

A trip to the world's edge

RETIRED hospital consultant and lifelong birdwatcher Tom Lawson will be the speaker at the next meeting of Craven and Pendle RSPB. He will give an illustrated talk, *A Last Voyage to St Kilda*, describing a journey to the Outer Hebrides and St Kilda.

The meeting is at Shippton Town Hall at 7.30pm on December 10.

in
brief

keighleynews.co.uk

Christmas lights switch-on

CONHOLEY Singers and Glusburn School Choir will entertain shoppers at Cross Hill's Christmas Family Event this evening. Celebrated around shops on the Main Street, the festivities kick-off at 5.30pm and include a Santa's Grotto outside Willman and Willman, festive donkey rides and a treasure hunt, with sheets available from Forget the Net. And, the Christmas tree lights will be turned on at 6pm. Parking will be available at South Craven School on Holme Lane.

Long-running show returns

THE 1st Kilwick and Farnhill Scout Group is busy preparing for its 74th Gung Show, which is now the longest running in the county.

It will be staged at Glusburn Institute tomorrow and Saturday at 7.15pm.

The Beavers, Cubs, Scouts and Explorers will sing songs from hit musicals as well as a tribute to Abba. There will be the traditional Crest Of A Wave to finish the show.

Tickets are priced at £6.50 for adults and £4 for children. Contact Neil Tillotson on 01535 653511.

Latest housing strategy available for consultation

PLANNING

THE LATEST version of a blueprint setting out future land use across Bradford district can now be seen in Keighley.

The Local Plan Core Strategy sets out where thousands of new houses should go in Keighley and surrounding villages. Bradford Council recently updated the draft strategy and has now put it out for public consultation.

The new version includes 1,200 new houses for Slisden and 400 for Haworth. Residents can examine the updated strategy at Keighley, Bingley, Ilkley and Bradford libraries from Mondays to Fridays from 9am to 7pm, and Saturdays from 9am to 5pm.

The plan can also be studied at council offices, including the One Stop Shop in the Keighley Town Hall, from Mondays to Thursdays from 9am to 5pm, and Fridays from 9am to 4.30pm. Hearings were then held in March

this year by Independent Government Inspector Stephen Pratt, after which the council proposed a number of limited changes to address issues raised at those hearings.

This second period of consultation will last until January 20, and residents can comment on those changes.

The relevant documents are available for inspection during this eight-week period. They set out the policies and highlight the proposed changes together with the reasoning behind them.

The modifications to the Core Strategy and the associated supporting documents can also be downloaded by visiting bradford.gov.uk/LDR.

Representations must be made in writing and are encouraged to be submitted electronically on the official form.

They can be submitted by e-mail to planning.policy@bradford.gov.uk or by post to Jacobs Well, Nelson Street, Bradford BD1 5RU.



The site of the stalled Worth Valley Shopping Centre project, and Cllr Michael Westerman



QSEARCH

REGISTER SIGN IN



Ilkley 5.5°C

Ilkley Gazette

NEWS SPORT FEATURES YOUR SAY WHAT'S ON JOBS PROPERTY ANNOUNCEMENTS CARS

News Local news National News Education Zone Community News Obituaries World War One Tour De France 2014

Civic Society and Ilkley councillors meet over Core Strategy changes



Helen Kidman, chair of Ilkley Civic Society

Keep in touch with local news

Sign up for email alerts

Send your news, pictures & videos

Most Popular

[More stories](#)

Your local area >

Amanda Greaves // News

Share

MEMBERS of Ilkley Civic Society are expected to meet with ward councillors today to establish their position on proposed modifications to the Core Strategy of Bradford's Local Plan.

Bradford Council made changes to its proposed Core Strategy – the central policy document of its new rule book for development in the district – following hearings by a planning inspector in March last year.

The changes included increased house-building targets for Ilkley, Burley-in-Wharfedale and Menston, which have gone up by hundreds of homes.

Bradford Council is currently holding a public consultation on the major modifications to the Core Strategy, ending on January 20.

Ilkley Civic Society chairman, Helen Kidman, said the organisation plans to meet with Ilkley ward councillors today to discuss its position on the changes, and invited members of Ilkley Parish Council to also attend.

A Habitat Regulations Assessment, which had been built into the original Core Strategy to protect green fields near the edge of Rombalds Moor from development, was challenged at the hearings by representatives of a consortium of housing developers.

Share article

Council officers revised housebuilding targets in Wharfedale as a result of this, and redesignated Burley-in-Wharfedale and Menston as Local Growth Centres.



Mobile site Contact Us Subscribe Photo Sales Advertise AdChoices Archive Topics Announcements Site Map Exchange and Mart Dating

Despite opposition from local residents and organisations, the housebuilding target for Ilkley was also increased, from 800 to 1,000 homes.

Promoted Stories



The 15 Best 4x4s on UK Roads Today
(Motoring.co.uk)



Retro Futurism Timepieces : HYT Watches
(TREND HUNTER)

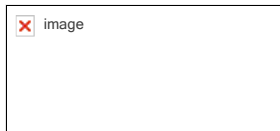


The Little Coupe With Plenty of Bite (Review)
(Parkers)



Top 10 Most Luxurious Cars!
(CarBuyer)

Recommended by



Comments are closed on this article.

Terms & Conditions Contributor Terms Cookie Policy Privacy Policy ©Copyright 2001-2015
This site is part of Newsquest's audited local newspaper network | A Gannett Company
Newsquest (Yorkshire & North East) Ltd, Loudwater Mill, Station Road, High Wycombe, Buckinghamshire. HP10 9TY[3223515]Registered in England & Wales

IPSO REGULATED This website and associated newspapers adhere to the Independent Press Standards Organisation's Editors' Code of Practice. If you have a complaint about the editorial content which relates to inaccuracy or intrusion, then please contact the editor here. If you are dissatisfied with the response provided you can contact IPSO here

Appendix 5: Extract from E-newsletter Plan-it Bradford (November 2015)

Plan-it Bradford

Issue 24

NOVEMBER 2015

Plan-it Bradford is the e-newsletter that keeps you up to date with the latest planning policy news and the progress being made on the Local Plan for the Bradford District.



Core Strategy Update Examination News

Public Consultation on the Proposed Modifications

As part of the ongoing Examination of the Core Strategy DPD, the Council is now proposing a series of main modifications to the Publication Draft version of the plan, following the outcomes of the hearing sessions which were held in March along with further evidence.

The proposed modifications address issues of soundness raised during the initial hearings, along with others resulting from updated evidence base studies and recent changes to Government policy.

The Council has updated two key pieces of evidence, namely the Gypsy and Travellers Accommodation Assessment and the Habitats Regulations Assessment (HRA). These reports will be published alongside the consultation document and will be available to view on our 'Evidence Base' web page.

The Council will shortly be seeking comments on these proposed main modifications to the Core Strategy.

Public consultation on the proposed modifications will commence on Wednesday 25th November 2015 for 8 weeks, ending at 4pm on Wednesday 20th January 2016.

Following the consultation, all representations will be forwarded onto Mr Stephen Pratt, Planning Inspector, for his consideration.

All comments must relate to a main modification identified in the **Proposed Main Modifications** document. Comments which do not relate to a modification may not be taken into consideration by the Inspector at this stage in the process.

It is anticipated that the Inspector will finalise his report by spring 2016. This would allow the Council to consider his report and, subject to his recommendations, move towards legally adopting the Core Strategy later in 2016.

The Core Strategy Proposed Main Modifications and supporting documents will be available at: www.bradford.gov.uk/planningpolicy under 'Core Strategy - Proposed Modifications'.

This issue brings you the latest news on the following Local Plan documents:

- ▶ *The Core Strategy Proposed Modifications Consultation*
- ▶ *Area Actions Plans*
- ▶ *Community Infrastructure Levy*
- ▶ *Waste DPD*
- ▶ *Update on Neighbourhood Planning activities within the District.*

In addition to the main modifications the Council will also make available for information an '**Additional Modifications**' which are of a minor nature.

All those interested parties who are currently on the Local Plan database will automatically receive a notification at the start of this consultation with details of where to find the documents and how to make comments.

Any progress/news updates will continue to be published on the Examination webpage. Please keep checking this webpage for the latest news from the Programme Officer or the Inspector. http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/core_strategy_dpd_examination.

Appendix 6: Summary of Comments Received to the Proposed Main Modifications and Council's Response

		Page
• MM1 – 37	Section 3: Vision, Objectives and Core Policies	1
• MM38 – 62	Section 4: Sub Area Policies	56
• MM63 – 71	Section 5.1: Economy & Jobs	74
• MM72 – 112	Section 5.3: Housing	83
• MM113 – 130	Section 5.4: Environment	183
• MM131 – 137	Section 5.5: Minerals	197
• MM138 - 146	Section 5.6: Waste	198
• MM147 – 148	Section 6: Implementation & Delivery	200
• MM149	Section 7: Monitoring <i>(No comments)</i>	-
• MM150 – 156	Appendix	201

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

The following table summarises the main issues raised in response to the main modifications proposed to the Core Strategy Publication Draft together with the Councils response. Where the issues relate to matters which have already been dealt with as part of the Examination to date this is made clear in the Councils response with reference to where this can be found.

The Proposed Main Modifications relate to the document published November 2015 (Document reference PS/G004a) .
 Policy and paragraph numbers relate to the Core Strategy Publication Draft as submitted (Submission Document reference SD001)

Proposed Modification No.	Policy / Paragraph	Main Issue	Respondent	Council’s Response
Section 3				
MM1	Objective 2	<p>1. Burley In Wharfedale and Menston are not sustainable locations for new development in terms of transport accessibility, lack of services and focus of meeting the needs should be on brownfield land within the City of Bradford and conflicts with Objective.</p>	20 , 103	<p>The comments do not relate to the proposed modification, but rather the applications of the objective in context of other parts of the plan and other main modifications. In this context there is an implied support for the objective.</p> <p>The Objective is appropriate and reasonable in order to set out the key elements against which the spatial vision can be measured and has informed the core approach of the plan. The plan needs to be read as a whole when applying the policies.</p>
		<p>2. Ilkley has limited deliverable and developable brownfield land and minimal sustainable development locations. Ilkley is not a sustainable location and the housing requirement for the settlement conflicts with this objective and should be reduced.</p>	26 , 27, 54, 55, 77	<p>See response 1 above.</p> <p>The Council disagrees. Ilkley is a principal Town and is a sustainable location for the proposed level of growth.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

	Objective 2 (cont.)	3. The change to scale of development in Wharfedale including Ilkley, Menston and Burley does not meet the statement about sustainable locations.	70, 80,	See response 1 above.
		4. Support the inclusion of the words ‘in full’	34, 54 , 55 ,78 , 108, 109, 113	Noted.
		5. Object to the lack of a change to objective as previously requested by the objector which removes reference to prioritisation of use of Previously Developed land.	78	This is not a new issue and was considered as part of initial examination hearings. The prioritisation of the use of previously developed land is appropriate and in line with National Policy. The objective makes clear that this has to be deliverable and developable land. See also responses to related issues under MM96 – MM98 in relation to policy HO6.
MM2	Policy SC1 (Criterion B5)	1. General support for change	91	Noted
		2. Support for the change which recognises the role of Burley in Wharfedale and Menston.as Local Growth Centres as appropriate locations for growth.	16, 34 , 39, 40, 41, 47, 58, 104, 113	Noted.
		3. Object to the inclusion of Burley and Menston as Local Growth Centres and object to Ilkley remaining a Principal Town. Their new status and growth will impact on green belt,	26 , 27 , 38, 46, 51, 54, 55, 70, 71, 75, 77, 80, 92 , 103 ,	The change is a consequential change as a result of main modification 7 / 8 (MM7 /MM8). See below for response to changes to settlement hierarchy.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

		<p>landscape and currently inadequate infrastructure. The approach is not justified by the evidence. Change is based on flawed approach in terms of housing requirement, and HRA work. It will weaken the need for an urban focus.</p> <p>Burley does not meet the criteria for a Local Growth Centre, especially where employment potential is concerned. And is incompatible with the statutory provisions of the Village Design Statement.</p>	114 ,	The Council considers the settlement hierarchy and the housing requirement are sound.
		<p>4. Reiterate the matters and actions identified in the LCR Duty to Cooperate table contained in the Duty to cooperate statement in support of the Core Strategy. This highlights the on-going need to liaise and work on cross boundary issues (green belt and infrastructure) with Leeds CC as the Core Strategy is implemented through the Allocations Development Plan Document</p>	107	<p>The representation does not raise objection to the modifications but rather restates the agreed approach for addressing cross boundary impacts as set out in the Duty to Cooperate Statement (SD/006), see in particular Appendix 4 which sets out the issues and agreed approach.</p> <p>No new duty to cooperate arise from modifications as already a recognised need to work through allocations on detailed cross boundary matters on both green belt change and infrastructure within these locations.</p> <p>The comments are noted.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM3	Policy SC1 (Criterion B6)	1.	Support for change in relation to Local Service Centres	16	Noted.
		2.	Support change to Local Needs	34, 78, 108, 109	Noted
MM4	Paragraph 3.20 In support of Policy SC1	1.	Support for additional text in support of Policy SC1 Criterion B (5).	16	Noted.
		2.	The modification does not provide adequate clarification in particular it suggests principal towns and Local Growth centres are all hubs. This does not reflect the more complex relationships between the settlements. This could be better explained in the sub area policies with cross reference back to policy SC1.	113	In combination the text in policy SC1t within B(5) and within the text within the propose modification clearly defines what is meant by hubs.
		3.	The change to settlement hierarchy increases the hubs within Wharfedale. Local plan should focus on a limited number of hubs which support an urban focus.	114	This is a consequential change linked to MM7 – see related response on change to settlement hierarchy. The plan does have an urban focus in terms of overall scale and distribution of development and by defining settlements in Wharfedale as hubs does not change that focus.
MM5	Policy SC3	1.	Support change which reflects wider range of stakeholders and need to work together	16, 78	Noted.
MM7	Policy SC4 (Local	1.	The statement that Steeton with Eastburn and Silsden are all located	10, 36, 118	The modification is a statement of fact reflecting the settlements do benefit from

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

	Growth Centres)		along key road and public transport corridors is misleading as the roads are congested.		good access to the key road network and public transport including a strategically important rail corridor which links into both Leeds and Bradford.
	Policy SC4 (cont.)	2.	<p>Silsden Is not a sustainable centre and the scale of development cannot be accommodated without significant investment into infrastructure (transport education and utilities)</p> <p>Silsden should be downgraded in the settlement hierarchy to a Local Service Centre.</p>	102, 118	<p>Silsden is a sustainable centre. The settlement hierarchy was based on robust evidence including the settlement study (EB/040 to EB/042) and the Bradford Growth Assessment (EB/037). This demonstrates that Silsden has a good range of facilities and is well located in terms of access to key transport infrastructure.</p> <p>The status in the hierarchy of Silsden was not changed in the main modification. The Council consider that its categorisation as a Local Growth Centre is appropriate and justified.</p> <p>The Council recognise the need for investment in supporting infrastructure which is identified within the Local Infrastructure Plan (EB/044) and key elements are referenced within the sub area policy AD1 and AD2 and supporting text.</p>
		3.	Support for the modification which recognises the role of Burley in Wharfedale and Menston as Local Growth centres as locations that can accommodate sustainable growth.	16, 34, 39, 40, 41, 47, 58, 104	Noted.
		4.	Object to inclusion of Burley and Menston as Local Growth Centres and	27, 46, 51, 54, 55, 70,	The settlement hierarchy was based on robust evidence including the settlement

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

	<p>Policy SC4 (cont.)</p>	<p>Ilkley remaining as Principal Town. Scale of development cannot be accommodated with current infrastructure (Education, Transport and other services) and Employment opportunities and will impact on the landscape which is key to tourism in the area. The plan does not proposed additional changes which recognise the additional pressures on services and infrastructure and how they can be met.</p>	<p>71, 75, 76, 77, 80, 103, 114</p>	<p>study (EB/040 to EB/042) and the Bradford Growth Assessment (EB/037). The Council sets out further background to the settlement hierarchy in its response statement to the Inspectors matter 3.2 (PS/E003).</p> <p>The evidence supported the categorisation of Ilkley as a Principal Town The role of Ilkley and its place in the hierarchy was fully discussed at the initial examination hearings and the representations do not raise any new issues.</p> <p>Paragraphs 3.56 to 3.60 of the CSPD explain the role and derivation of the Settlement Hierarchy. They explain that the Local Growth Centres tier was created partly due to land supply constraints in the upper two tiers and partly due to the fact there are significant differences in the characteristic of the settlements below the Principal Towns level (some having better accessibility and /or better ranges of services and facilities) and their ability to grow in a sustainable way.</p> <p>Burley and Menston were identified in the CSFED as a Local Growth Centre, informed by the Council’s Settlement Study, in recognition of its location and accessibility to key transport links and its range of shops, services and community facilities..</p> <p>Its status was changed within the CSPD as</p>
--	---------------------------	--	-------------------------------------	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

	<p>Policy SC4 (cont.)</p>	<p>The change is also based on a flawed approach to the overall housing /employment requirement.</p> <p>The proposal contradicts national planning policy and also other local and regional strategies.</p>	<p>a result of the HRA which indicated the need for restrictions of the amount of housing development in the areas within 2.5km of the S Pennines SPA & SAC. It was at that point no longer considered a settlement where significant growth could be accommodated so was placed in the bottom tier of the settlement hierarchy.</p> <p>However the subsequent revisions to the HRA have removed the need to take a highly precautionary approach in limiting development within the 2.5km zone and Burley has been re-classified as a Local growth Centre accordingly.</p> <p>The Housing Requirement and the related studies which underpin it are robust and in line with national policy and guidance. The housing requirement and the objections to it were discussed in great detail at the original EIP hearings. See related response to issues raised with regards to the housing requirement under MM72.</p> <p>The Core strategy is supported by an assessment of how the plan as whole complies with the NPPF currently in place. (XXX). Reference is made to several sections of policy in NPPF which are not relevant to Local Plan preparation and relate exclusively to determination of planning applications.</p>
--	-------------------------------	---	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

	Policy SC4 (cont.)				The plan needs to be read as whole. The plan recognises the importance of the wharfedale valley in terms of landscape, heritage and green infrastructure. However this does not place a moratorium on development. The Council believes based on robust evidence that the scale of development proposed can be accommodated. The allocations will look in detail at these considerations as part of the site selection process which will also look at any appropriate mitigation.
		5.	General support for change	91	Noted.
MM8	Policy SC4 (Local Service Centres and Rural Areas)	1.	Settlement targets should reflect local needs assessments. Propose that the reference to local needs is reinstated. Change conflicts with other text which still retains reference to local needs.	26, 69	The Council disagrees. There is no requirement within the NPPF to carry out objective assessments of need at a local settlement by settlement level. The Plan and its housing targets have been informed by a range of relevant evidence and criteria as described in 164-171 of the CSPD including a SHMA.
		2.	Recognises and support consequential deletion of Menston and Burley.	34, 40, 41, 47, 58, 104 , 113	Noted.
		3.	Object to the deletion of Menston and Burley as Local Service Centres and re categorisation as Local Growth Centres. The current infrastructure, in particular	38, 51, 75 , 77	The change is a consequential change as a result of main modification 7 (MM7). See above related response to the changes to settlement hierarchy.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

			transport, is unlikely to be improved to make them sustainable places to grow.		
		4.	Support change which clarifies position on ‘Local Needs’.	108	Noted.
MM9	Outcome table for Policy SC4	1.	Support consequential addition of Menston and Burley to table.	34, 39, 40, 41, 47, 58, 104, 113	Noted.
		2.	Object to inclusion of Menston and Burley as Local Growth Centres.	51, 70, 75, 77, 92, 103, 114	Consequential modification. See response to issue 4 under MM7.
		3.	General support for change	91	Noted.
MM10	Paragraph 3.62	1.	Support ‘Appropriate provision in Local Growth centres and Local Service Centres and improved clarity of approach.	34, 78, 104	Noted.
		2.	The figure of 68% at line 8 of the amended paragraph is incorrect in light of the proposed Main Modifications and should be 65.9%.	39	This is a factual error which can be amended via a minor change on adoption.
MM11	Paragraph 3.71	1.	Support for Menston and Burley to change to Local Growth Centres.	34, 40, 41, 47, 58, 104, 113	Noted.
		2.	General support for change	91	Noted.
		3.	Object to change to Menston and	51, 71, 75,	Consequential modification. See response

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

		Burleys status as Local Growth Centre	77	to MM7.
		4. Object to lack of change to status of Cullingworth.	34	The settlement hierarchy is justified by the evidence. See response to MM7 in terms of background and approach. There is no justification to raise Cullingworth in the settlement hierarchy.
		5. Object to inclusion of Silsden as Local Growth Centre.	102	Consequential modification. See response to issues 1 and 2 under MM7.
MM12	Paragraph 3.75	1. Object to Burley and Menston deletion as Local Service centres and support reinstatement	27, 51, 75, 77	Consequential modification. See response to issue 4 under MM7.
		2. Support for deletion of Burley and Menston as Local Growth Centres.	40, 41, 47, 58, 113	Noted.
		3. Support change to Local Needs.	34, 108	Noted.
MM13	Paragraph 3.80	1. Propose a minor grammatical amendment.	9, 62	Support a grammatical change which will be made through a further minor change on adoption. Text to read: ‘It is a policy which only applies to the production of the site allocating DPDs.’
		2. Object to the removal of references to windfall proposals without putting in place a statement of the policy that would apply in such circumstances especially given some large scale windfall proposals could lead to further	39, 66, 114	The Council disagrees. It explained during the Examination hearings that the Council’s intention was not to prevent windfalls from coming forward and it was not the intention to subject windfall developments to this policy. The policy was intended to apply

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

		<p>encroachments into Green Belt land.</p> <p>MM13 at a stroke excludes this policy for windfall sites and there can be no good reason for doing so. Windfall sites must conform to all the same policies as other sites. Retain original text.</p> <p>Windfalls should be viewed in light of their ‘fit’ with, and contribution to, the settlement hierarchy. If a large windfall site would skew the settlement hierarchy, in terms of the spatial emphasis of land supply and/or the rate of delivery, then the policy needs to be able to provide for refusal of planning permission on that site.</p>	<p>solely to the site selection process within plan making and not to development management decisions.</p> <p>Windfalls are likely to form a small but important part of the on-going supply and as long as they are in suitable locations which conform to other policies within the development plan they should be approved. If windfall proposals are put forward in unacceptable locations which would damage key environmental assets then there are policies in place within the Core Strategy which would prevent this.</p> <p>The Government is clear that Local planning Authorities should be planning positively to boost the supply of new homes and should ensure that at all times there is a 5 year supply of deliverable housing sites. Seeking to frustrate acceptable windfall proposals would not accord with this principal.</p> <p>As the Council is embarking on the production of a new Allocations DPD which will fully assess the potential land supply it is difficult to see why there would be windfalls in future years which would be of a magnitude sufficient to ‘skew’ the settlement hierarchy.</p> <p>Finally if windfall proposals are submitted in green belt locations there are policies within the Core Strategy and national guidance within the NPPF on which the suitability of</p>
--	--	--	--

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

				those proposals can be judged.
MM14	Policy SC5	1.	Support modification to B3	13, 109, Noted.
		2.	<p>Item B.2 refers to the ‘Strategic Road Network’ and appears to refer to both the local primary road network managed by Bradford Council and the strategic road network (SRN) managed by Highways England on behalf of the Department of Transport.</p> <p>Elsewhere in the Draft Core Strategy differentiation is made between the strategic road network and the local primary road network. A better wording would be ‘strategic and local primary road networks’.</p>	13 No modification was proposed to Criterion B (2). The proposed change suggested is not central to the policy as written. The Criterion is promoting development which takes account of both existing and potential for improved capacity across the whole network including both the local (implied) and strategic network (given as a particular example).
		3.	Object to the lack of modifications to the first part of this policy (Part A). The prioritisation of major brownfield and city centre sites has significant deliverability issues, where such sites often have issues of viability. Restate objections to the Publication Draft Core Strategy in relation to Policy SC5 and propose the policy is redrafted.	113 The issue of the priority to be given to previously developed sites and the operation of policy SC5 has already been aired within the initial EIP hearings. The Council strongly disagrees with the objector. The policy wording makes clear reference to the fact that prioritisation is of those previously developed sites which are considered deliverable or developable.
MM15	Paragraph 3.93 in support of Policy SC6	1.	Support	39 Noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

	Green Infrastructure			
		<p>2. Amend paragraph 3.93 and MM15 as follows:</p> <p>‘Providing high quality areas of natural greenspace on a suitable scale <u>in accordance with Policy SC8</u> will assist in mitigating the adverse effects of increased recreation on the South Pennine Moors SPA/SAC.’</p> <p>This supporting wording to Policy SC6, which refers to mitigating adverse effects of increased recreation on the South Pennine Moors SPA / SAC, should link back to Policy SC8 so as to clarify the particular methods envisaged to address any adverse impacts on the South Pennine Moors SPA / SAC through increased recreation.</p>		<p>Ensuring provision of high quality areas of natural greenspace to assist in mitigating the adverse effects of increased recreation on the South Pennine Moors will be an element in a strategic approach to making an assessment of the extent and adequacy of Green Infrastructure within the district. Assessment will take place at a district and settlement level as an element in a plan-led approach. In contrast, Policy SC8 identifies a zones of influence approach and relates to mitigation that might be required from an individual project or proposal.</p> <p>It is not considered necessary or appropriate to directly link one policy with another either through the policy text or accompanying text, as an individual policy could be subject to future review or challenge.</p> <p>The Council therefore disagrees with the change proposed. The change is not appropriate or warranted to make the plan sound.</p>
MM17	Policy SC7	<p>1. Support for modification in particular the exceptional circumstances for green belt change which are support by the evidence to deliver housing need and jobs.</p>	16, 34, 58, 91, 104, 109, 113	Noted.
		<p>2. The exceptional circumstances for green belt change are not justified for</p>	20, 22, 28, 29, 30, 31,	Policy HO2 together with the Council’s Housing background Paper clearly set

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

<p>MM17 (continued)</p>		<p>the following reasons:</p> <p>The housing requirement under policy HO1 is flawed in particular because it does not align with official population and household projections and the approach taken to employment projections which have been reduced through MM65.</p> <p>The housing requirement will not be delivered and will not meet the needs of the district both in terms of affordability or type of housing.</p> <p>There is sufficient brownfield land within the city of Bradford to meet the needs.</p> <p>Lack of overarching assessment of the strategic function of the green belt with adjoining Local Planning Authorities.</p> <p>Housing need and physical constraints on land supply are not sufficient to constitute exceptional circumstances.</p> <p>The underlying economic strategy justifying the need for the areas of land for employment has not been made that this in itself constitutes “exceptional circumstances”.</p>	<p>32, 35, 38, 39, 45, 47, 50, 53, 57, 59, 61, 63, 66,68, 69, 72, 74,76, 77, 79, 80, 82, 84, 85, 86, 87, 90, 93, 98, 99, 101, 105, 106, 112, 114, 115, 116, 117</p>	<p>out the evidence which indicates that there are exceptional circumstances which justify releasing green belt to meet the objectively assessed needs for new homes in the District. This was supplemented in the Councils response to the Inspectors Matters and questions under matter 3.4 (PS/E003) and fully considered at the relevant examination hearing. As a result of the discussions at the hearing the Council prepared a further statement which elaborated on the exceptional circumstances (PS/F067). This was published for comment. A further document was prepared by the Council in response to the further issues raised by participants (PS/F086b).</p> <p>The Housing Requirement for the plan period cannot be met in full without the use of land currently designated as Green Belt based on evidence in the SHLAA.</p> <p>Having established that the land supply in non-green belt locations is not available to meet the districts needs the Council commissioned the Bradford Growth Assessment (EB/037), This has confirmed both that there are sustainable locations within the green belt for growth and that there are areas where the green belt can be changed without leading to the undermining of the role of the green belt either locally or strategically.</p>
-----------------------------	--	--	---	--

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

<p>MM17 (continued)</p>		<p>That the “long term economic success of the district do not constitute an exceptional circumstance</p>	<p>NPPF paragraph 47 makes clear that Local Plans should meet their objectively assessed housing need in full. Paragraph 83 allows for the review of Green Belt boundaries under exceptional circumstances through the preparation of the Local Plan.</p> <p>The Housing Requirement and the related studies which underpin it are robust and in line with national policy and guidance. The housing requirement and the objections to it were discussed in great detail at the original EIP hearings.</p> <p>The housing requirement is not flawed and does align with the jobs growth forecast as modified. To be clear – and this is set out plainly in the Housing requirement reports – the housing requirement was never based on the very high and aspirational jobs growth figures of 2897. They were based on REM projections of 1604 jobs per annum hence the need and justification for the modification to Policy EC2.</p> <p>The Plan seeks to plan positively to meet its assessed development needs in full. In doing so the approach is based on sound evidence and aligns with NPPF. The Council acknowledges that the scale of development and type of growth to be delivered will be challenging and performance against the key monitoring framework will be reported through the</p>
-----------------------------	--	---	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM17 (continued)				<p>Annual Monitoring Report.</p> <p>The availability of Brownfield land has been assessed through several SHLAA’s and it is clear as set out in (PSF067) see table under paragraph 2.4 that the total available brownfield land can only accommodate approximately 18,000 dwellings. This follows comprehensive survey work and call for sites including from communities to put forward brownfield sites, together with a reduction of the site size threshold.</p> <p>The Councils statement (PS/F067) clearly sets out the reasons for new land for economic development which cannot be met by use of non green belt land. This relates both the scale type of land and market location.</p> <p>National Policy supports sustainable economic growth. The district, as well as the Leeds City Region Strategic Economic Plan, support long term economic growth and job creation as key priority. This is a key element of the plans spatial vision and objectives and aligns with national policy.</p>
		<p>3. Council should have weighed the claimed exceptional circumstances, which are clearly a district wide statement of housing need, against the function and purpose of the Green Belt in the areas of proposed release.</p>	39	<p>The Exceptional Circumstances are demonstrated for the Local Plan as whole base on the housing and economic needs of the district and not on a settlement by settlement basis. The policy sets out how the other local plan documents will consider</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM17 (continued)		The Core Strategy appears to make assumptions that in any given location the Council will be able to satisfy itself that exceptional circumstances outweigh Green Belt function. Before the Allocations DPD stage has been reached we do not see how the Council can properly and quasi-judicially come to that conclusion.		the function of green belt when undertaking a green belt review and allocating land.
		<p>4. The Bradford Growth Assessment is no more than a broad and strategic review of the role and importance of the green belt around each settlements and cannot constitute evidence in any sense, as it is based upon information supplied by the Council. Furthermore, in the case of the review of the Green Belt at Holme Wood, the information on which the Bradford Growth Assessment is based is not necessarily wholly correct.</p> <p>Reference to the Growth Assessment in paragraph 3.102 should be deleted.</p>	39, 45, 61	The Bradford Growth Assessment (EB/037) provides appropriate and robust evidence based upon already published economic, social and environmental data across the various settlements from a range of recognise sources. It is recognised that some limited detailed information may now have become out of date (e.g. local facilities which are now several years old) but it still provides a robust basis in support of a strategic level local plan document. The Local Infrastructure Plan provides a comprehensive overview of infrastructure and this will be regularly updated and will inform the work on the more detailed local plan documents.
		<p>5. The Bradford Growth Assessment did not provide adequate independent evidence supporting a land release at Tong and the Neighbourhood Development Plan did not support the use of the Tong Valley for housing as there was overwhelming public</p>	28, 29, 31, 45, 50, 53, 59, 61, 66, 72, 74, 84, 87, 93, 93, 101, 112, 117	Bradford Growth Assessment (EB/037) provides appropriate and robust evidence in support of the Core Strategy. It was undertaken by independent consultants working to the Councils Brief. It follows good practice and constitutes a professional and sound piece of work.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM17 (continued)		opposition to the proposals.		The nature and relationship of the Holme Wood and Tong Neighbourhood plan was fully considered as part of the original hearings and there are no new issue or evidence being presented or has arisen.
		<p>6. The change to green belt will result in unjustified urban sprawl and lead to coalescence of Leeds and Bradford.</p> <p>The development of 11,000 homes in this area would harm the function of green belt in this location.</p>	22, 32, 59, 61, 66, 79, 82, 101	<p>Based upon the Bradford Growth Assessment (EB/037) sufficient land can be found to accommodate the scale and distribution of development. The policy sets out the detailed requirements for any review of the green belt which includes consideration of green belt functions and strategic importance.</p> <p>The plan does not propose 11, 000 new homes within the Holme Wood and Tong green belt. The figure relates to the possible extent of the housing which may need to be delivered on former green belt land across the District.</p>
		<p>7. Piecemeal approach to green belt change based on selective review likely to see major disparities between settlements in terms of green belt change and compromise strategic green belt purposes.</p>	35, 80	<p>The Green Belt review will be conducted as one review as part of the Allocations DPD in line with the Policy SC7. The detailed methodology for the Green belt review will be subject to consultation and will be aligned with the approaches in adjoin Local Plan areas.</p> <p>The scale and distribution under Policy HO3 will result in differing scales of green belt change in different settlements. The Council</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

				consider that this can be accommodated in an appropriate way based on the evidence.
MM17 (continued)		8. Propose that the green belt review should be full rather than selective.	26, 80, 101, 109, 113	
		9. The policy implies a two stage or two level process which would take longer than a comprehensive one stage review and would be less likely to lead to a balanced outcome. It is necessary to undertake a comprehensive Green Belt review as soon as possible and preferably as a precursor to the first detailed identification of potential land allocations. The review should not be left until the Allocations	12, 113	The Green Belt review will be conducted as one review as part of the Allocations DPD in line with the Policy SC7. The detailed methodology for the Green belt review will be subject to consultation and will be aligned with the approaches in adjoining Local Plan areas. A two stage approach is appropriate given the Nature of the local plan documents being produced in line with the Local Development Scheme. This is an approach adopted successfully by other Local Plan. The approach is properly articulated under policy SC7 and considered appropriate and in line with national policy and guidance.
		10. In order to provide the necessary evidence a full strategic review of the Green Belt will be required to assess whether development of particular sites could take place without prejudice to the strategic function of the Green Belt. No allocation of sites should occur before such a review is completed. Without such a Strategic Review the modification and the Core	54, 55, 101, 114	Based upon the Bradford Growth Assessment (EB/037) sufficient land can be found to accommodate the scale and distribution of development without prejudicing the strategic function of the green belt. Policy also makes clear that the strategic function of green belt is a key consideration in any methodology for a green belt review.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

		Strategy as a whole is unsound.		
MM17 (continued)		<p>11. NPPF one example of exceptional circumstances, this being that of “planning for larger scale developments such as new settlements or major urban extensions”, which of course is not the proposition being made by the Council.</p>	35	<p>The Council has made clear that it will need at least one major urban extension at Holme Wood to contribute towards the housing requirement. This referenced under the relevant sub area policy and was discussed at the relevant hearings.</p> <p>Note the reference is from paragraph 82 of NPPF which relates to when a new green belt is established. Paragraph 83 relates to the approach relevant to the review of an existing green belt which is being proposed within the Core Strategy under Policy SC7.</p>
MM17		<p>12. Planning Policy Guidance March 2014 which makes it clear that “local planning authorities should, through their local plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the framework as a whole or specifically – this includes policies regarding land designated as green belt, HRA and prevention of flooding”</p> <p>Similarly guidance from government dated 4 October 2014) has not been applied with any serious intent. That guidance states “councils, in considering need, should take account</p>	35, 39, 61, 69, 80	<p>National Policy and guidance make clear that Local Plans should plan positively for growth and should seek to meet their develop needs in full. It does allow Councils to make a case where this cannot be done without adverse impacts which would significantly and demonstrably outweigh the benefits. Any such approach would need to be made on credible, appropriate and robust evidence. In the event of any local plan successfully demonstrating this position would then introduce a major duty to cooperate issue given it would result in unmet need which would have to still be planned for within the wider strategic planning area including adjoining housing markets.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

(continued)		of any constraints such as green belt which indicate that development should be restricted and which may restrain the ability of an authority to meet its need”		The Council has sought to plan positively to meet its needs in full. This recognises the significant local needs in particular for housing which need to met. in so doing has assessed the impact at a strategic level through its evidence. It considers that the scales of development while challenging given land supply and environmental and heritage constraints can be met with appropriate safeguards and mitigation.
		13. The Council should revisit the overall housing requirement given the scale and likely impact of change to green belt and government guidance.	35, 38	The Council has taken a robust approach to assessing housing need which follows Government guidance within the NPPF and practice guidance within the NPPG. There are no reasons to revisit this. It has also clearly set out that it has considered the implications of seeking to meet those needs in full and having regards to the need to review the green belt and has taken account of a range of evidence. It is satisfied that those needs can be met in a sustainable way.
		14. It is unclear on what basis the estimate of 11,000 homes being required on green belt, which does not appear to have changed as a result of the change to housing distribution. The change to green belt will also be required in order to meet need for infrastructure and employment.	35, 80	The figure of 11,000 is not a policy but an estimate of the broad level of need which may turn out to be a little higher or a little lower once work on the Allocations DPD progresses. The Council have explained that the estimate is based on the data within the SHLAA and a combination of the extent of land supply within the ‘suitable now’ category together with a discounted

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM17 (continued)				<p>contribution from the deliverable and developable sites in the ‘potentially suitable’ category. It also assumes that the land supply within the SHLAA will also need to supply suitable and for other uses such as community facilities.</p> <p>The reason that there Council has made no change to the 11,000 estimate is that there is no justification for doing so. Nearly all settlements have targets which exceed the availability of non green belt land. The limited re-distribution (with the exception of 100 dwellings in the Shipley & Canal Rd Corridor) are from areas which need to see some degree of green belt land release to other areas which also need to see green belt land release.</p>
		<p>15. Housing need should not override green protection.</p> <p>Reference is made to house of common briefing (4 January 2016) which makes clear that unmet housing need is unlikely to outweigh harm to green belt and constitute ‘very special circumstances’.</p>	26, 28, 29, 31, 45, 50, 61, 69, 72, 74, 79, 84, 85, 98, 112	<p>This statement relates to the consideration of planning applications especially in context of those areas where there is no current 5 year supply of deliverable housing land, which have to show ‘very special circumstances’ . The test for Local Plans is ‘exceptional circumstances’.</p>
		<p>16. The scale of greenbelt releases in Wharfedale is significant and will weaken its strategic function in this area. And coalescence of settlements.</p>	38	<p>Based upon the evidence within the Bradford Growth Assessment (EB/037) sufficient land can be found to accommodate the scale and distribution of development without prejudicing the</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM17 (continued)				<p>strategic function of the green belt.</p> <p>Policy SC7 sets out the detailed requirements for any review of the green belt which includes consideration of green belt functions and strategic importance as part of the allocations development plan document.</p> <p>The SHLAA indicates the full extent of land and site submissions within green belt areas. The totality of the supply within Wharfedale lies substantially in excess of the total Wharfedale housing requirement. Only some of the currently proposed green belt sites will therefore be required and there will be no requirement or danger of coalescence between any of the Wharfedale settlements.</p>
		<p>17. Greenbelt also plays its part in conserving the special landscape of Wharfedale. On the north side, this is recognised as an area of outstanding natural beauty. On the south side, only greenbelt policy holds back excessive development. The Council’s own adopted Landscape Character Assessment (October 2008) refers to ‘limited scope for new development’.</p>	38	<p>The important character of Wharfedale is recognised within the plan under several policies including WD1 and WD2, individual topic policies in particular those in the environment section and the principles/considerations in the housing section for housing site allocation.</p> <p>Landscape character not one of purposed of green belt designation but will inform site selection process.</p>
		<p>18. Conflict with MM54 which protects the character of Wharfedale.</p>	26	<p>The plan needs to be read as a whole and the potential impact of any development</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

				options will tested against the range of appropriate and relevant policies of the Core Strategy before their allocation.
MM17 (continued)		19. The alleged ‘exceptional circumstances’ for the green belt change in the Bradford SE area been not been adequately detailed.	28, 29, 31, 74	<p>The Exceptional circumstances need to be demonstrated for a local plan not individual sites within a plan. The Exceptional circumstances as required by paragraph 82 of NPF are fully documented (see response above).</p> <p>The basis for the named urban extension at Holme wood was fully discussion at the previous hearings. No proposed modification is made with regards to Holme Wood or the South East scale and distribution.</p>
		20. The Council make the decision to remove land from green belt at Holme Wood before 2009 contrary to the then RSS with higher housing targets. The approach was not consulted with Leeds (with a failure under the Duty to Cooperate) and justified by the evidence which in terms of exceptional circumstances and growth study were ex post facto justifications.	39, 66, 74	<p>The nature and relationship of the Holme Wood and Tong Neighbourhood plan was fully considered as part of the original hearings and there are no new issue or evidence being presented or has arisen. The recommendations of the NPD were tested with other evidence in coming to a conclusion about the appropriateness of the urban extension.</p> <p>The plans proposals for Home Wood have been part of on-going liaison with adjoining LPAs including Leeds. Details are set out in the Duty to Cooperate Statement (SD/006).</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM17 (continued)		<p>21. Release of green belt in Tong Valley would be unsustainable and have potential impacts on both landscape , recreation facilities, transport, becks (water quality and flooding) and local residents in both Holme wood, and Tong Valley.</p>	<p>28, 29, 32, 61, 66, 72, 74, 79, 82, 84, 85, 87, 90, 93,,98, 101, 105, 112, 117</p>	<p>The Bradford Growth Assessment (EB/037) considered the sustainability of the various settlement and neighbourhoods together with a high level examination of the green belt functions. The Council is of the opinion that an urban extension can be accommodated. The exact scale and boundary will be determined through the allocation DPD which will consider a range of issues including landscape, flood risk and infrastructure and any appropriate mitigation which may be required.</p>
		<p>22. The SHLAA sites around Holme Wood would not provide a robust new boundary and provide for a significant area of potential which if used could have major impact on the green belt function in this location.</p>	<p>66, 72</p>	<p>The SHLAA sites will be the start point for the allocation of sites. However, the final development sites will be informed by a formal site selection process and green belt review informed by the Core Strategy policies. This will seek to ensure the most appropriate sites and changes to the green belt boundary both to ensure deliverable sites and a revised green belt boundary which is appropriately defined and considers the functions of green belt.</p> <p>The boundaries for housing allocations and any revisions to the green belt boundary will be set within the Allocations DPD and will not necessarily follow in every case the boundaries as set out in the current SHLAA. The Allocations DPD will involve further site assessments and a detailed green belt review and if necessary alternative green belt boundaries may be put forward.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM17 (continued)		23. Is the Council defining “exceptional circumstances” for the purposes of paragraph 82 NPPF, as it states in the marginal note to MM17 and in its paper PS/FO67 lodged post Examination, or should it be addressing paragraph 83 NPPF? The former deals with New Green Belts and the latter to the alteration of Green Belt boundaries. We note that the November 2015 Addendum to the Sustainability Appraisal also refers only to paragraph 82. In the Core Strategy and the Main Modifications the Council refers to “selective reviews” of the Green Belt; and at page 205 it refers to paragraph 83 NPPF and not paragraph 82 as being the section relevant to HO1 HO2 and HO3. For lay readers of the Core Strategy this leads to some confusion.	39	Paragraph 83 is the relevant section which sets out the exceptional circumstance for changing the extent of an already established green belt through the review of a local plan. This is referenced in the Councils statement (PSF067) at paragraph 2.4. The reference in the main modification table was incorrect an should have read paragraph 83. The text of the plan itself does not make reference to any of the specific paragraphs. In this respect no further change is required. The statements and evidence are all clear that exceptional circumstances are required and the council has set out these in detail in both the relevant statement and through the main modification MM18.
		24. The modification does not address the issue of ensuring a long terms green belt boundary through the identification of Safeguarded Land.	113	The Councils response to the Inspectors Matters and questions under matter 3.4 (PSE003) set out its consideration of safeguarded land and the matter was fully considered at the relevant hearing. The representations restate previous representation and do not raised any new issues or evidence.
MM18	Paragraph 3.102 In support of Policy SC7.	1 There no exceptional circumstances for the release of green belt. Housing need does not override green	10, 22, 27, 28, 29, 32, 38, 45, 50, 53, 57,	See response to issues raised under MM17. The NPPF does not have a brownfield first policy but rather encourages its use. Local

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

<p>MM18 (cont.)</p>		<p>belt protection in NPPF</p> <p>Government promotes Brownfield first policy rather than the use of Green belt as being proposed by the Core Strategy</p> <p>There is sufficient brownfield land it is that the Council has not undertaken a robust survey of brownfield land as required by Government and has not had a proactive approach to bringing such sites forward and have not used recent funds from government to support this.</p> <p>The use of green field sites for job creations is flawed and will not address the need for jobs in sustainable locations.</p>	<p>59, 66, 68, 69, 70, 72, 74, 77, 79, 80, 84, 85, 86, 87, 90, 92, 96, 98, 99, 103, 105, 106, 112, 114, 115, 116, 117</p>	<p>Plans are still required to plan positively for growth and ensure a supply of deliverable and developable sites. The plan seeks to prioritise brownfield land as far as appropriate in line with NPPF.</p> <p>The SHLAA demonstrates the nature and scale of the potential land supply which clearly demonstrates that while substantial the supply of potential brownfield land would not meet the plans development needs in full.</p> <p>The SHLAA has gone through several iterations and calls for sites from landowners, developers and communities. It is a robust and up to date overview of the potential land down to a low site threshold..</p> <p>The majority of housing delivered over the past 10 years has been on brownfield land with new build on brownfield being consistently over 70%. See. Table H3 in the AMR (PSB003).</p> <p>The Council has also accessed recent government money aimed at unlocking stalled brownfield sites.</p> <p>The Councils statement (PS/F067) sets out the exceptional circumstances for employment land. This recognises the issues regarding the size and quality of land in the right market location.</p>
-------------------------	--	---	---	--

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

		<p>2. Agree that exceptional circumstances exist for a green belt review as required by Paragraph 82 of NPPF and the additional text provides clarity on the nature of the exceptional circumstances.</p>	<p>34, 40, 41, 47, 58, 65, 78, 104, 108, 109, 113</p>	<p>Noted. See response above which clarifies exceptional circumstances for review of existing green belt are found in paragraph 83 of NPPF.</p>
MM18 (cont.)		<p>3. Reiterate the matters and actions identified in the LCR Duty to Cooperate table contained in the Duty to cooperate statement in support of the Core Strategy. This highlights the on-going need to liaise and work on cross boundary issues (green belt and infrastructure) with Leeds CC as the Core Strategy is implemented through the Allocations Development Plan Document.</p>	<p>107</p>	<p>The representation does not raise objection to the modifications but rather restates the agreed approach for addressing cross boundary impacts as set out in the Duty to Cooperate Statement (SD/006), see in particular Appendix 4 which sets out the issues and agreed approach.</p> <p>No new duty to cooperate arise from modifications as already a recognised need to work through allocations on detailed cross boundary matters on both green belt change and infrastructure within these locations.</p> <p>The comments are note noted.</p>
		<p>4. The employment need and the reference to 84 hectares of Green Belt required has not been justified, proven and tested cumulatively "in the round"- to measure impacts on other policies.</p> <p>The need for employment land has not been sufficiently identified and is grossly exaggerated.</p>	<p>12, 22, 28, 29, 45, 50, 69</p>	<p>The exceptional circumstances statement (PS/F067) clearly sets out the evidence as it relates to employment land. This was considered in full at the initial examination hearings.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

		No justification for 135 Ha of land.		
MM18 (cont.)		5. Object to the final sentence in relation to employment land which contain the terms “key market locations” and “good market locations”, as NPPF does not support the underlying commercial value of the green belt, or any particular part of the green belt, as being a justification for its amendment. “Value”, per se, is not an exceptional circumstance, yet the use of the term “market” clearly goes to the issue of value.	39	<p>The detailed statement sets out the employment exceptional circumstances. This relates both to the overall quantum a review of the current supply including quality size and locations. It is important that the Local plan supports appropriate economic development and this seeks to find the right size and mix of sites in the right locations.</p> <p>The value of the green belt will be tested through the allocations DPD as part of the Green belt review in line with policy SC7 and an agreed methodology.</p>
		6. The contention that, “land is available in the green belt in sustainable locations which would also not prejudice the strategic function of the green belt,” in particular within Wharfedale has not been justified. It is a bland assertion with no evidence to support it.	54, 55, 103, 80	<p>Based upon the evidence within the Bradford Growth Assessment (EB/037) sufficient land can be found to accommodate the scale and distribution of development without prejudicing the strategic function of the green belt.</p> <p>Policy SC7 sets out the detailed requirements for any review of the green belt which includes consideration of green belt functions and strategic importance as part of the allocations development plan document. While some of the sites within the SHLAA if used could lead to coalescence the green belt review as part of the allocations would properly assess all sites to ensure these core purposes are not</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

				prejudiced in any change.
MM18 (cont.)		<p>7. It is not accepted that there is land available in the greenbelt in sustainable locations of sufficient size to allow the provision of 700 houses and 5ha for employment (MM69), in Burley.</p> <p>The strategic function of the greenbelt will be prejudiced.</p>	70, 103	<p>See response 6 above.</p> <p>The Council is of the opinion with regard to the relevant evidence that the strategic function of the green belt will not be prejudiced.</p> <p>The Council has set out the exceptional circumstances which exist and which require the release of green belt land. It has also assessed alternative distributions of the housing requirement at the different stages of plan preparation. Green belt change will be necessary in most settlements within the district. Green belt change can be achieved in Wharfedale in sustainable locations and in ways which would not undermine the strategic functioning of the green belt.</p> <p>This is not the case. The Bradford Growth Assessment states that the green belt in this area provides only a limited strategic role.</p> <p>The proposed housing target would have to be much higher than that proposed for there to be any need or threat of coalescence. There is sufficient land available in locations which would not threaten coalescence, particularly to the west of the settlement.</p> <p>The Neighbourhood plan is at an early</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

		Work on the emerging neighbourhood plan shows support for the 200 homes in the Publication draft		stage of preparation and will need to align with the emerging local plan and positively support delivery of strategic elements of the Core strategy including the scale and location of new housing development to meet the plan requirement.
MM18 (cont.)		<p>8. MM18 refers to “Key Market locations where land could be made available in order to ensure a suitable offer of deliverable large sites in key market locations.....”</p> <p>The modification infers the unsustainable development since virtually all houses sold on “deliverable large sites in good market locations in Wharfedale ” would be built to meet commuter demand from outside the District (the growth areas of Leeds and Harrogate).</p>	80	The text refers to the exceptional circumstances in relation to employment land not housing.
MM19	Supporting text to Policy SC8 (Protecting the South Pennine Moors and their zone of influence). Paragraph 3.104	<p>1. MM19 is a general introductory paragraph relating to the assessment process and its context.</p> <p>Amend paragraph 3.104 to delete part of the modified text as follows:</p> <p>‘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 ecological integrity of any European</p>	104	<p>The phrase, ‘does not lead to adverse effects on the ecological integrity of internationally important habitats or species assemblages within or close to the district’, was used in the summary and introduction to the HRA Report (Nov 2015) as an introductory statement. It gives an indication of what the overall process of assessing a plan is about for a general reader.</p> <p>The language used in the Regulations can be important, but it is Regulation 102 which relates to assessment of the implications for European Sites of land use plans which</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

<p>MM19 (Cont.)</p>		<p>Site internationally important habitats or species assemblages within or close to the district. ‘</p> <p>(Please note that further proposed amendments suggested by the respondent are identified in bold with strike through where deletion of modifications is proposed.)</p>		<p>underpins the assessment. The language used in regulations needs to be considered in context, as opposed to inserting particular phrases into a general planning text.</p> <p>The Council disagrees with the amendment proposed. The Council does not consider that there is inconsistency between this modification and others. The proposed change are not required to make the document sound.</p>
		<p>2. Object to the modification for the following reasons:</p> <p>There is a duty to cooperate with North Yorkshire County Council over the North Pennines HRA zones B and C which has not been demonstrated.</p> <p>The North Pennines HRA 2.5km zone impacts built up areas of Ilkley but there has been no compensatory reduction of housing numbers - in fact there has been a 25% increase.</p> <p>The cumulative effect of development sites in HRA Zones A, B and C needs to be considered because of the potential for effects on the Rivers Wharfe and Aire which flow into the Humber Estuary which has various conservation designations for</p>	<p>54, 55</p>	<p>The Council has set out in the Duty to Cooperate Statement (SD/006) how the Core Strategy preparation has met the legal duty. The Statement also sets out how the work on the key strategic issues has evolved and how bodies have been engaged and to what effect.</p> <p>Appendix 4 to the Duty to cooperate statement contains the LCR duty to cooperate table which sets out the issues and agreed approach. This explicitly picks up consideration of the SPA/SAC under issue 4. Harrogate are part of the LCR duty to cooperate arrangements as set out in the statement. The earlier examination hearings fully considered the compliance with the legal duty.</p> <p>The conclusion to the HRA Report of November 2015 indicated, as did earlier iterations of the Report, that unmitigated,</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

<p>MM19 (Cont.)</p>		<p>migrating and breeding birds.</p> <p>The application of the HRA needs a complete review to constrain development in Wharfedale.</p>	<p>impacts were likely to be greater in relation to the South Pennine Moors due to their relative proximity to locations and high levels of accessibility. Policy SC8 and the zones of influence approach, including zones B and C was therefore put in place as a means of addressing impacts in relation to the South Pennine Moors.</p> <p>Overall impacts were considered likely to be less significant in relation to the North Pennine Moors SPA and SAC, and therefore a zones of influence approach has not been proposed in the core strategy in relation to the North Pennine Moors. However, the HRA Report of February 2014 on page 5 provides an indication in broad terms of the extent of any potential 2.5km zone in relation to the North Pennine Moors. Such a zone could cover an area to the north of Addingham, but would only include a small area to the north of Ilkley that lies close to the district boundary.</p> <p>The European Sites which could be affected by the core strategy are listed in Section 4 of the HRA Screening Report, which is on the Councils website. The sites that were considered are identified in Table 4.1 on page 17 of the report. These did not include the Humber Estuary. Natural England agreed with the HRA Screening Report.</p> <p>The modifications proposed have been assessed in the HRA Report of November</p>
-------------------------	--	--	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM19 (Cont.)				<p>2015, published in support of the modifications consultation.</p> <p>Provided the recommendations in the HRA Report are followed through and the modifications put forward by the Council relating to the HRA work remain incorporated into the plan, then the Council has been able to conclude that the core strategy with modifications would not result in adverse effects on the integrity of the South Pennine Moors SPA/SAC.</p> <p>Natural England have agreed with the assessment conclusions, provided that all mitigations measures are appropriately developed and secured. The HRA does identify a need for further survey and assessment work to inform the Allocations DPD.</p>
		<p>3. Object to the modification on a number of grounds:</p> <p>Sub-issue a) Reports submitted by consultants acting on behalf of the Council have contained serious errors in data handling and data interpretation which have served to inflate housing numbers and the inconsistencies running through both the initial Plan and the Main Modifications are a direct consequence. The modifications attempt to establish/reinforce a wrongful/unsound bias/compromise</p>	80	<p>Sub-issue a)</p> <p>The Plan is supported by appropriate and robust evidence which has been tested as part of the initial examination hearings including the work in support of the housing requirement under policy HO1.</p> <p>The Council considers that the data collected so far in relation to the HRA is adequate for the purposes of a strategic plan. Further data will be collected to inform the choice of sites identified for development in the Allocations DPD and to</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

<p>MM19 (Cont.)</p>		<p>between commercial pressures and the Habitats Regulations and other duties, including those within the NPPF.</p> <p>Sub-issue b Habitats Regulations require consideration from the outset of any Plan process, and at each stage at least: This includes: the identification of Natura 2000 sites/Ramsar sites within and outside the plan area that could potentially be affected; the specific features of the Natura 2000 sites which led to their designation, the conservation objectives for the site; the site’s ecological condition and any particular problems or sensitivities of the site’s features that could be affected. Evidence of on-going consultation with Natural England is needed as well as Screening of the plan in order to</p>	<p>assess the need for mitigation.</p> <p>The HRA Report of November 2015, is robust and in line with the agreed approach with key stakeholders. This has been produced by consultants Urban Edge, who are specialist consultants experienced in carrying out HRA work.</p> <p>Natural England have been involved at all key stages and have agreed with the approach and assessment conclusions, provided that all mitigations measures are appropriately developed and secured.</p> <p>Sub-issue b) The European Sites that could be affected by policies and proposals in the core strategy and particular features and conservation objectives of these sites were identified at the screening stage. Prior to this, proximity to the South Pennine Moors SPA and SAC had been identified as an issue in the early stages of sustainability appraisal work.</p> <p>The HRA screening assessment of the core strategy was published as part of the preparation process.</p> <p>Consultation has taken place with Natural England through the process of plan preparation and in relation to detailed</p>
-------------------------	--	---	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

<p>MM19 (Cont.)</p>		<p>determine whether the plan alone or in combination with other plans and projects is likely to have a significant effect of the Natura 200 sites identified</p> <p>Sub-issue c) There is ample evidence and contradictions in written evidence to display that the Council has prioritised other commercial drivers on Spatial Strategy and Housing Allocations, without balanced consideration and justification. Further it appears that duties under the HR’s have been deliberately sidelined and avoided until late in the Plan process, with the result of providing bias/advantage to other drivers.</p> <p>Sub-issue d) Reference is made to guidance produced by David Tyldesley and Associates for Natural England (2006).</p> <p>Sub-issue e) Concern is expressed about differences in approach between Harrogate and Bradford. The records display fundamentally conflicting approaches to overriding duties and the handling of the challenges for development in two neighbouring Authorities in relation to the SPAs and SACs in the Wharfe Valley under a Duty to cooperate.</p>	<p>aspects of the HRA work.</p> <p>Sub-issue c) HRA assessment of the plan took place at a stage where the policies and proposals in the plan were reasonably developed, but could still be influenced by the outcomes of the assessment.</p> <p>Sub-issue d) In relation to guidance, the HRA Report of November 2015 indicates:</p> <p>Draft guidance on HRA has been defined by DCLG (2006) with more detailed draft guidance from Natural England (Tyldesley, 2009) and a range of other bodies¹. More recently <i>The Habitats Regulations Assessment Handbook</i> (Tyldesley & Chapman, 2013) was developed to improve earlier methodologies on the basis of recent good practice and case law, and in response to Defra’s Habitats and Birds Directives Implementation Review.</p> <p>Sub-issue e) There are a number of factors</p>
-------------------------	--	--	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

<p>MM19 (Cont.)</p>		<p>Sub-issue f) Based on the site improvement plan for the South Pennine Moors concern is expressed about the lack of a joined up approach towards planning applications between local authorities bordering the South Pennines identified as Burnley, Kirklees, Oldham, Rochdale and Calderdale.</p> <p>Sub-issue g) The modifications refer to mitigating the effects of proposed actions. There appears to be no analysis to consider whether mitigation of the combined loss of foraging land is necessary or even practicable.</p>	<p>which will influence the approach of a local authority to HRA assessment and consideration of potential impacts. These will include the type of plan that is being assessed, the policies and proposals in the plan, the stage of plan-making, the spatial geography of the district in relation to the European Site, evidence collected and the conservation objectives and qualifying features of the European Sites.</p> <p>However where the issues being addressed are similar then achieving consistency between local authorities would be a positive and reasonable aim and Natural England have a role to play in this respect. We have already started to share data with other authorities. There has been wider agreement in relation to the likely significant effects of potential for loss of in-bye/ feeding and foraging habitat. Further co-ordination could take place as we progress the survey and assessment of sites for the Allocations DPD and develop the approach to mitigation.</p> <p>See response to sub issue a) in terms of compliance with Duty to cooperate.</p> <p>Sub-issue f) See answer to e) The site improvement plan for the South Pennine Moors indicates that the lead body for implementing the joined up approach across planning authorities is Natural England and that the proposed timescale for doing this is</p>
-------------------------	--	---	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM19 (Cont.)		<p>Sub-issue h) sites for which the impacts and mitigations remain uncertain have to be put into the later phase of the plan, to allow time for better evidence to be provided and, potentially, enable windfall sites to come through in their stead so that they need never be developed.</p>		<p>2015-2020, but that the delivery mechanism has not yet been identified, nor has a cost estimate or funding mechanism.</p> <p>Sub-issue g) The HRA Report of November 2015, has analysis relating to foraging land in Section 6.2 Loss of Supporting Habitat and in Appendix 11.</p> <p>Sub-issue h) Further data will be collected to assess the need for mitigation and to inform the choice of sites proposed for development in the Allocations DPD. Where uncertainty exists this will be addressed in the Allocations DPD, in sustainability appraisal/SEA work and in the range of mitigation measures identified.</p>
MM19-24		Support for the modifications.	113	Noted.
MM20		<p>Natural England recommends that the 4th bullet point be amended as follows:</p> <p>“• Recreational impacts, including <u>the effects of</u> walkers <u>such as trampling</u>, dogs and erosion and...”</p> <p>(New text suggest is in bold underline)</p>	24	<p>The Council considers the amendment relates to syntax, although it is not considered to be critical in relation to understanding the text.</p> <p>The Council would be prepared to accept the amendment as a minor change, prior to adoption, however this is not considered to be a soundness issue.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM23	Supporting text to Policy SC8 (Protecting the South Pennine Moors and their zone of influence). Paragraph 3.108	<p>1 Modify amendments to paragraph 3.108 as follows:</p> <p>“The zone lying within 2.5km of the South Pennine Moors SPA and SAC was identified in the HRA Report as the area outside the SPA most frequently utilised by SPA qualifying species. And where supporting high quality habitat of particular importance was to be found. To improve understanding of the use of the moorland fringe by birds of the SPA, surveys were undertaken to record bird activity.”</p> <p>(further suggested changes new in bold underline and deletions in bold strike through)</p> <p>The proposed amendment to this supporting text is for clarity. Without the amendment the text suggests that the 2.5km zone is more frequently used by SPA qualifying species than the SPA itself, which is very unlikely and not the meaning intended.</p>	104	<p>The subject of the first sentence is clearly identified as ‘the zone lying within 2.5km of the South Pennine Moors SPA and SAC’. The amendment put forward is not considered to add clarity, but rather to amend the emphasis and meaning of the sentence. An amendment of this nature puts greater emphasis on the extent of the zone than was intended, which would be out of keeping with the later sentences in the same paragraph, indicating that caution needs to be applied to the survey and assessment work that has been carried out to date.</p> <p>The Council disagrees with the amendment proposed and do not consider the plan is unsound as proposed to be modified under MM23.</p>
		<p>2. Support for further assessment taking place at Allocations DPD stage in respect of SPA/SAC.</p>	34	Noted.
		<p>3. Support for MM23 in so far as it acknowledges that caution should be</p>	109	The Council notes the cautious support and will be undertaking further survey work to

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM23 (Cont.)		<p>applied to the HRA work that has been undertaken in relation to the identification of areas of importance for foraging birds and that further assessment can be undertaken at the site allocations stage. It is considered that flexibility should be given to enable landowners to commission their own survey work in respect of this matter where necessary.</p>		<p>inform the Allocations DPD.</p>
		<p>4 object to the modification. The proposals in the plan and modifications for sites, allocations, green belt deletions of the magnitude stated are not soundly based in the absence of an independent assessment of marginal and incremental effects of all sites on all Natura 2000 sites, SPAs and SACs in zones as extensive as those considered in the Harrogate District Plan process.</p> <p>The group believes that it is necessary to clarify the nature of the assessment to be carried out on each potential site within the 2.5 km zone and that an independent</p> <p>Environmental Assessment should be carried out for all sites to determine whether they should be considered or allocated for development individually or in combination with other sites.</p>	80	<p>The HRA assessment, overall approach and mitigation measures developed need to relate to the context and European Sites of Bradford District and to consideration of the policies and proposals in Bradfords core strategy.</p> <p>The outcomes and a description of the first stage in the assessment process for sites in the SHLAA2 trajectory are presented in Section 6.2 of the HRA Report of November 2015 and in Appendix 11. The Report indicates that additional survey and assessment work will be required to inform the Allocations DPD and that outputs would be incorporated into the wider sustainability appraisal and Strategic Environmental Assessment testing process.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

		5.	Natural England support the modifications.	24	Noted
MM24		1	Support for the proposition that, 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 to be avoided, in relation to the impact pathways identified.	34	Noted
		2.	Natural England support the modifications.	24	Noted
		3.	It is considered that in order to comply with the HRA policies for the South Pennine Moors SPA/SAC, for each site proposed for development in the greenbelt additional data will have to be collected and subject to scrutiny.	70	<p>The Council considers that the data collected so far is adequate for the purposes of a strategic plan. Further data will be collected to inform the choice of sites identified for development in the Allocations DPD and to assess the need for mitigation.</p> <p>A description of the first stage in the assessment of sites in the SHLAA2 trajectory in relation to their role as supporting habitat and outcomes of this process are presented in Section 6.2 of the HRA Report of November 2015 and in Appendix 11. This work was carried out in consultation with Natural England. Clearly this process only relates to the role of sites as supporting habitat.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM25		<p>1. The modification proposed by the Council was as follows:</p> <p><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></p> <p>The respondent proposes that additional text is added with the words <u>‘and taking into account achievable mitigation’</u> inserted after the words ‘including in-combination effects.’</p>	113	<p>The paragraph reflects the regulations and the role of the plan-making authority in relation to giving effect to a land use plan, only having ascertained that it will not adversely affect the integrity of the European Site and the last stage of the assessment process.</p> <p>The Council does not accept the amendment proposed as being appropriate or necessary.</p>
		<p>2. Object to the modifications. In order to demonstrate that there is no adverse effect on the integrity of the SPA/HRA, all combined and individual assessments should be carried out transparently and openly by independent assessors, under the direction of Natural England.</p>	80	<p>A description of the first stage in the assessment of sites in the SHLAA2 trajectory in relation to their role as supporting habitat and outcomes of this process are presented in Section 6.2 of the HRA Report of November 2015 and in Appendix 11. This work was carried out in consultation with Natural England.</p>
MM26	Re-drafted Policy SC8 (Protecting the South Pennine Moors and	<p>1. The modifications are supported.</p>	113	Noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

	their zone of influence) Paragraph 3.111			
MM28	Re-drafted Policy SC8 (Protecting the South Pennine Moors and their zone of influence)	1.	Natural England supports the re-drafted policy SC8.	24 Noted
		2.	Support for the approach to Zones A, B and C appearing reasonable and the expectation that the effects of development proposals on foraging habitat would be assessed.	34 Noted.
		3.	Support for the re-drafted policy SC8. In particular, some support for the greater clarity and for removal of the reference to a precautionary approach, in relation to zone B.	58, 109 Noted
		4.	Support for mitigation of loss implied but cannot envisage how there can be adequate mitigation for loss of greenbelt.	70 The policy relates to mitigation measures to address impacts on the South Pennine Moors SAC/SPA and not the Green Belt as such.
		5.	object to the policy it is considered that visitor pressure was one of the reasons for development numbers being reduced. Question whether increased visitor pressure on the moors can be mitigated by the provision of new recreational greenspace and wardens, as the moors offer a particular outdoor	69 The Council is committed to developing a range of mitigation measures in liaison with Natural England, learning from other authorities and, once measures are in place, reviewing the effectiveness of those identified. Whether sites provide an important foraging resource will also be tested.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM28 (Cont.)		experience, there are numerous access points and due to the existing condition of habitat. The proposed level of development and its distribution within the 7km radius is therefore unsound because the mitigation measures proposed will be largely ineffective. Sensitive sites within 7km and which require environmental assessment should be excluded from the Core Strategy proposed sustainable housing provision.		The Council have confidence that the broad approach that has been identified, which would include a range of suitable management measures, both on the SPA/SAC and within the wider area, and which will be further developed, will be effective.
		<p>6. The approach to the re-wording of policy SC8 is supported but the following changes are requested to improve clarity and future interpretation.</p> <p>Sub-issue a) Propose a change to the paragraph which begins</p> <p>‘Subject to the derogation tests of Article 6(4) of the Habitats Directive,’</p> <p>Sub-issue b) Propose amended version of this paragraph which begins</p> <p>‘In Zone B it will be necessary..’</p> <p>Sub-issue c) The policy wording relating to Zone C is supported.</p> <p>Sub-issue d) Reference should be</p>	113	<p>Sub-issue a) The amendment identified is not considered to improve clarity or future interpretation in a manner that would be consistent with the Habitats Directive or the Regulations.</p> <p>The Council does not agree with the amendment.</p> <p>Sub-issue b) The text identifies issues clearly in relation to Zone B in the context of levels of data currently available and the strategic level of plan making. Over simplification of the position in relation to mitigation measures in the context of current levels of data could be misleading.</p> <p>The Council does not agree with the amendment.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

		made to the emerging SPD on the South Pennine Moors SAC and SPA, which should provide further guidance on mitigation measures.		<p>Sub-issue c) The Council notes the support.</p> <p>Sub-issue d) Reference has been made to the production of an SPD.</p>
MM28 (Cont.)		<p>7. Objection to the modifications and concern is expressed about the fact that the whole of Wharfedale lies in the 2.5km zone identified in Policy SC8 and also within an area where the 2.5km zone relating to the South Pennines SPA would overlap, to an extent, with any 2.5km zone linked to the North Pennines SPA. The modifications put forward in relation to the housing distribution for Wharfedale and the status of Burley in wharfedale and Menston are considered to make the plan even less sustainable and increasingly unsound. They also object to the status of Ilkley as a principal town.</p>	26, 55	<p>The amended targets for housing distribution proposed have been assessed in the Reviewed HRA Report. Provided the recommendations in the HRA Report are followed through and the modifications put forward by the Council relating to the HRA work remain incorporated into the plan, then the Council has been able to conclude that the core strategy with modifications would not result in adverse effects on the integrity of the South Pennine Moors SPA/SAC.</p> <p>Natural England have agreed with the assessment conclusions, provided that all mitigations measures are appropriately developed and secured. The HRA does identify a need for further survey and assessment work to inform the Allocations DPD.</p>
		<p>8. Yorkshire Greenspace Alliance object to these modifications on the grounds of not being effective. The chief concern is that the suite of modifications – especially MM23, 24 and 25 – has the effect of demoting the strategic significance of the SPA/SAC, (as for example identified</p>	80, 114	<p>The amended targets for housing distribution proposed have been assessed in the HRA Report of November 2013, published in support of the proposed modifications. Provided the recommendations in the HRA Report are followed through and the modifications put forward by the Council relating to the HRA</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM28 (Cont.)		<p>in policy SC6 relating to green infrastructure) deferring any consideration of its planning implications to ‘lower tier plans. There is no clarity or strategic steer as to whether, when ‘lower tier’ planning is taking place, there is any facility to shift the spatial emphasis of development from one location to another across the district, in response to the ‘more detailed information/ assessments’ that are envisaged. Without that facility – and with many sites deleted from the Green Belt and allocated for development – the Local Plan as a whole is left with very little ability to modify the pattern of development if impacts on the SPA/SAC become apparent. The Core Strategy should retain the ability to plan monitor and manage development effectively as and when further evidence of pressures on the SPA/SAC emerges.</p>		<p>work remain incorporated into the plan, then the Council has been able to conclude that the core strategy with modifications would not result in adverse effects on the integrity of the South Pennine Moors SPA/SAC.</p> <p>HRA work can only take into account issues relating to the assessment and the particular impact pathways identified. The policies and accompanying text, with modifications seek to ensure that loss of areas regularly used by SPA qualifying species can be avoided, as an element in the approach to mitigation for a strategic plan. This allows the Council, as the competent authority, to take account of the need for further survey work relating to foraging areas and of uncertainties relating to choice of sites, locations and full extent of development and be able to exclude the risk of a significant effect on the conservation objectives of the site. Provided that the approach identified in the HRA Report of November 2015 is followed through and modifications put forward by the Council remain, then the Council considers that the measures identified would be effective.</p>
		<p>9. The Environmental Assessment and SPA/HRA needs to be assessed by an independent assessor as the closeness of Ilkley Moor to Ilkley and Burley is important and is also relative to areas in the Aire Valley.</p>	77	<p>The amended targets for housing distribution proposed have been assessed in the HRA Report of November 2015. Provided the recommendations in the HRA Report are followed through and the modifications put forward by the Council relating to the HRA work remain</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

				<p>incorporated into the plan, then the Council has been able to conclude that the core strategy with modifications would not result in adverse effects on the integrity of the South Pennine Moors SPA/SAC.</p> <p>The Council has confidence in the HRA Report of November 2015, which has been produced by consultants Urban Edge who are experienced in carrying out HRA work. Natural England have agreed with the assessment conclusions, provided that all mitigations measures are appropriately developed and secured. The HRA does identify a need for further survey and assessment work to inform the Allocations DPD.</p>
MM29	Policy SC8 (Protecting the South Pennine Moors and their zone of influence)- Outcomes	1. Support for the expectation of managing and mitigating both direct and indirect effects.	34	Noted.
MM30	Supporting text to Policy SC8 (Protecting the South Pennine Moors and their zone of influence).	1. One of the indicators under policy SC8 as proposed to be modified, should be further amended, as follows: “Further survey work has taken place and an approach to mitigation in relation to sites used for foraging by South Pennine Moors SPA	104	<p>This is a strategic indicator expressed in broad terms which relate to future work.</p> <p>However the Council would be prepared to accept a minor change prior to adoption of ‘by <u>SPA qualifying bird species</u>’. This is not considered to be a soundness issue.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

	Indicators	<p><u>qualifying bird species</u> has been identified.”</p> <p>(suggested additional text is in bold underline)</p> <p>Proposed amendment to this Policy SC8 supporting text is for clarity.</p>		
		<p>2. Natural England have commented that it would be helpful to clarify who will be responsible for producing the management plan for the South Pennine Moors SPA/SAC.</p>	24	<p>The comments are noted, although the Council would emphasise that lead roles have only been identified in broad terms, a factual minor change could be made as follows:</p> <p>‘A <u>site improvement management</u>-plan has been produced for the South Pennine Moors SPA/SAC <u>by Natural England.</u>’</p> <p>However, it should be noted that this is not considered to be a soundness issue.</p>
MM31	Supporting text to Policy SC8 (Protecting the South Pennine Moors and their zone of influence). Paragraph 3.113	<p>1. Natural England support the modification made by the Council.</p>	24	Noted

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

		<p>2. Amend paragraph 3.113 (and renumber) as follows:</p> <p>‘The detailed review of available evidence presented in the HRA Report indicates that a precautionary spatial strategy would the approach should 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, as set out in Zone A. This is because, in most cases it will not be possible to be reasonably certain that such adverse effects could be avoided or alleviated at this distance.</p> <p>The proposed amendment would add after ‘urban edge effects’ the following:</p> <p><u>‘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></p>	104	<p>The wording of policy SC8 is already set out in the policy. The paragraph is there to act as a brief summary and explanation in less technical language. It is considered that it would be misleading to seek to add the second part of the sentence used in SC8 to identify Zone A to a different, more general sentence. Repeating the policy wording provides no further context. The amendment proposed is not considered appropriate or necessary..</p>
MM32	Supporting text to Policy SC8 (Protecting the South Pennine Moors and their zone of	<p>1. Natural England support the modification made.</p>	24	Noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

	influence) Paragraph 3.115				
		2.	The accompanying text still makes reference to the former zone Bi rather than the re-drafted zone B	109	The Council acknowledges that need to make the minor factual change of deleting i, prior to adoption. This is not considered to be a soundness issue.
MM33	Supporting text to Policy SC8 (Protecting the South Pennine Moors and their zone of influence). Paragraph 3.116	1.	<p>Suggest a further change to paragraph 3.116 as proposed to be modified, as follows:</p> <p>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. Further work will seek to ensure that <u>mitigation measures are adopted to avoid an adverse effect on the integrity of the SPA through loss of such</u> areas regularly used by these birds can be protected from development and its associated impacts. Taking forward an approach to identify and deliver mitigation measures, where required within this zone, will form an important element in future planning.</p> <p>(additional suggested text is shown in bold underline)</p>	104	<p>The text as set out in the modifications is considered to be consistent with the contents of the HRA Review, advice from Natural England and the process of assessing potential sites for future development. The overall approach is underpinned by Regulation 102 and the process of making an assessment of the implications for European sites, in view of that site’s conservation objectives, of the policies and proposals in the core strategy. A clear statement of the aim, in the accompanying text, of seeking to ensure that areas regularly used by SPA qualifying bird species can be protected from development and its associated impacts, is an important element in integrating the approach to foraging habitat into a strategic plan.</p> <p>It allows the authority to take account of the uncertainties relating to the need for further survey data relating to important foraging areas, the choice of sites, locations and full extent of development, inherent in a strategic plan and to be able to exclude the risk of a significant effect on the</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

<p>MM33 (Cont.)</p>		<p>The supporting text must be consistent with both Policy SC8 and regulations 61 and 62 of the Conservation of Habitats and Species Regulations 2010 (which in turn implement, in England, Article 6(3) in relation to “projects”).</p> <p>Policy SC8 correctly reflects the legal protection afforded to the South Pennine Moors SPA and SAC under regulations 61 and 62 by confirming that, a development will not be permitted where a likely adverse effect on the integrity of the SPA or SAC cannot be effectively mitigated. This is in full accordance with caselaw from both the Court of Justice of the European Union and domestic courts. It is also in accordance with the Council’s AA Nov 2015 which recognises the key role of mitigation measures in avoiding an adverse effect on site integrity (see for example para 6.2.61.</p> <p>The Council’s statement that “work will seek to ensure that areas used regularly by these birds can be protected from development and its associated impacts” is at odds with this. It fails to recognise that the legal protection is directed at SPA “site integrity” (rather than at supporting foraging habitat) and that an adverse</p>		<p>conservation objectives of the Site. A competent authority must not agree to a project or plan unless it has ‘made certain that it will not adversely affect the integrity of the site’. The modification offers a higher degree of certainty than the amendment proposed and in making the aim clear in language appreciable to the general reader responds to interest and concerns expressed by amenity groups and the general public.</p> <p>The modification is not inconsistent with other modifications made or with the caselaw quoted, which relates to individual clearly defined development projects or proposals. The amendment proposed is therefore not considered necessary or appropriate by the Council.</p>
-------------------------	--	---	--	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM33 (Cont.)		effect on SPA integrity from loss of supporting foraging habitat for SPA qualifying bird species can be mitigated.		
		2. Agree about the need to consider how development affects foraging habitat and to propose appropriate mitigation.	34	Note.
		3. Support for the modification on the grounds that this allows landowners and developers greater flexibility to provide evidence that development of sites will not adversely impact on the SPA and SAC. The acknowledgement that this can be addressed through the Allocations process is welcomed.	109	The Council notes the interpretation of the text and would envisage carrying out further survey work in relation to foraging areas to inform the Allocations DPD.
		4. Object to the modification. Reports submitted by consultants acting on behalf of the Council have contained serious errors in data handling and data interpretation which have served to inflate housing numbers and the inconsistencies running through both the initial Plan and the Main Modifications are a direct consequence. This is the clearest indication to date, that the process of accommodating duties within the Habitats Regulations and precursors within the Plan process have been neglected, badly directed, mis-timed	80	The Council has confidence in the HRA Report of November 2015, published in support of the proposed modifications. This has been produced by consultants Urban Edge who are experienced in carrying out HRA work. Natural England have agreed with the assessment approach and conclusions, provided that all mitigations measures are appropriately developed and secured. The context for the substance of the modification proposed is the HRA Report of November 2015, advice from Natural England and modifications to SC8. The

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

MM33 (Cont.)		and inadequate. The modification is presented without reason or justification. The Plan/ Modifications, irresponsibly, promote the adoption of strategies and allocations, without independent, soundly based research and evidence to establish that the current planned combination of Spatial Strategy allocations and sites is risk free in these respects.		modification proposed by the Council retains the assurance that further work will seek to ensure that areas regularly used by qualifying bird species can be protected from development and its associated impacts. It is considered that this, combined with other measures, allows the authority to take account of uncertainties relating to the extent of survey data, the choice of sites, locations and full extent of development, inherent in a strategic plan, and be able to exclude the risk of a significant effect on the conservation objectives of the site. This aim is made clear in language appreciable to the general reader and responds to the interest and concerns expressed by amenity groups.
MM34	Supporting text to Policy SC8 (Protecting the South Pennine Moors and their zone of influence) Paragraphs 3.117-3.119	1. Natural England support the modifications made.	24	
		2. Support for the recommendation that, “more detailed testing and traffic modelling should be undertaken to inform work on the Allocations DPD.” Where any significant increase in emissions is indicated along the A65 corridor in Wharfedale affected sites should be excluded from the	54, 55, 70, 80	The Council notes the support. However in the context of current evidence in the HRA, assessment would be focused on roads within 200m of European Sites.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

			Allocations DPD in order for the plan to remain sound. Congestion on the A65 will lead drivers to seek alternative routes adding substantially to traffic on unsuitable roads. Independent, open and transparent studies should be undertaken, under the duty to co-operate with North Yorkshire Council, Craven District Council, Leeds City Council, to examine the combined effects of all proposals within individual plans.		
MM35	Policy SC8 (Protecting the South Pennine Moors and their zone of influence) and supporting text Paragraph 3.118	1.	Natural England support the modifications made.	104	Noted
		2.	Acknowledgement that recreational impacts including trampling, erosion, effects of dogs etc need to be investigated.	34	Noted.
MM37	Supporting text to Policy SC8 (Protecting the South Pennine Moors and	1.	Natural England recommends that paragraph 3.121 should be amended to make explicit reference to the need for the provision of greenspaces and visitor and access management to be provided and maintained in perpetuity as stated in paragraph 5.3.3 of the	104	The Council would be prepared to accept this as a minor change prior to adoption. This is not considered to be a soundness issue.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 3 – Vision, Objectives and Core Policies

	their zone of influence) Paragraph 3.121 (Relates to production of SPD.)	HRA: ‘The evidence base for the forthcoming SPD will inform the identification and delivery of opportunities for additional greenspaces, improvements to existing areas and visitor access and management measures which will be secured in perpetuity.		
		2. Concern is expressed that the detail of the policy would be set out through an SPD which is contrary to Planning Practice Guidance stating: ‘ The Community Infrastructure Levy Regulations (2010) limit pooled contributions from planning obligations from infrastructure that may be funded by the Community Infrastructure Levy.	58	Policy SC8 is set out in the Local Plan, which in this case is a core strategy or strategic level plan. As indicated in the guidance, the SPD will build upon and provide more detailed advice or guidance on the policies in the Local Plan. This is not considered to be adding unnecessarily to the financial burdens on development. The SPD will be subject to consultation. The Council is aware of the limits on pooled contributions from planning obligations.
		3. Support for the production of an SPD that will outline the mechanism for calculating the financial contribution that will be sought.	109	Noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

The following table summarises the main issues raised in response to the main modifications proposed to the Core Strategy Publication Draft together with the Councils response. Where the issues relate to matters which have already been dealt with as part of the Examination to date this is made clear in the Councils response with reference to where this can be found.

The Proposed Main Modifications relate to the document published November 2015 (Document reference PS/G004a)
 Policy and paragraph numbers relate to the Core Strategy Publication Draft as submitted (Submission Document reference SD001)

Proposed Modification No.	Policy / Paragraph	Main Issue	Respondent	Council’s Response
Section 4				
MM38	Policy BD1 Criterion A Regional City targets	1. The proposed change of wording in Policy from ‘approximately’ to ‘at least’ is a significant change of meaning and gives freedom for development well in excess of 100 hectares of employment land. A more precise definition would be preferred. This is a matter that Highways England will have to consider when the Draft Site Allocations DPD is brought forward and in comments on the two Area Action Plans.	13	The comments are noted, however the Council do not consider that the change of wording would allow for allocations <u>well in excess</u> of 100 ha. The Council, in seeking to promote regeneration is simply wishing to introduce a modest degree of flexibility so it can plan positively within the Allocations DPD and respond positively to opportunities to bring forward attractive sites to the market. If the Council were to promote a land release well in excess of 100ha it would clearly be contrary to the Core Strategy.
		2. Supports the creation of 6000 homes in Bradford SE and the urban extensions set out in Policies BD1 and BD2	37	Support noted
		3. The modification is sound. The suggested change in the housing requirements for Shipley now provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of	9	Support noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

MM38 (Cont.)		<p>sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire.</p> <p>It is considered that the housing requirements for Shipley are now likely to be compatible with both national policy guidance and the plan’s own Policies for the protection of the historic environment.</p>		
		<p>4. Objections are made to the 6000 homes target for Bradford SE, some expressing concerns that it is disproportionately high, concerns are raised over green belt impacts, infrastructure, flood risk and impacts on the Tong Valley.</p>	<p>22, 28, 29, 31, 39, 45, 53, 59, 72, 74, 79, 82, 84, 85, 90, 93, 98, 101, 105, 112, 117</p>	<p>No modifications have been proposed to the Bradford SE housing apportionment and the in the Council’s view raise no new substantive issues over and above those raised in representations to the CSPD.</p> <p>The Council’s response to the issues, the appropriateness of the Bradford SE housing target and so on are covered within the table dealing with modification MM87 and MM88.</p>
		<p>5. It seems apparent that housing numbers for SE Bradford have been increased where of course they should be decreased so as not to encroach onto greenbelt land (bearing in mind there is no exceptional circumstance to be realistically regarded).</p>	<p>84, 87</p>	<p>This is incorrect. The numbers for Bradford SE have not been changed. The Council’s response to matters related to green belt and exceptional circumstances are dealt with under the tables sections for MM17 & MM18 and the Bradford SE housing target under MM87.</p>
		<p>6. Bradford Council, in the light of increased building in the Wharfe and Airedale valleys, has not seen opportunity to reduce the amount of greenbelt land to be released, but has instead identified</p>	<p>101</p>	<p>The objector is incorrect and has not taken account of the land supply evidence within the SHLAA. There are no other deliverable options for housing redistribution from</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

		<p>other locations where reductions can take place. I would suggest that it is in clear contradiction to NPPF regulations that any decision about Green Belt release is minimised in this way.</p>		<p>Bradford SE to other areas which would reduce green belt land take overall. The only area where green belt land is not required and where SHLAA land supply is higher than that proposed within Policy HO3 is within Bradford City Centre. However here the Council considers meeting even the proposed 3500 target will be challenging given the need to secure continuing regeneration in the centre. All the other Bradford sub areas bar the Canal Rd (where the land supply is not available to allow for an increased target) require green belt releases themselves.</p>
		<p>7. Support the proposed modification to ‘at least’ 100ha employment land but object to the reduced Bradford NE housing apportionment – also see comment to Policy HO3</p>	108	<p>The reduction in the Bradford NE housing apportionment is sound and is justified by the land supply evidence within the updated SHLAA.</p>
MM38-52		<p>1. Johnson Brook make a blanket statement relating to these reps as follows:</p> <p>The majority of the main modifications to the Sub-Area policies are a consequence of the modifications proposed to Policy HO3 in relation to the distribution of the housing requirement to individual settlements. Rather than repeating the same points in relation to the sub-area policies our comments are made to the proposed modifications to Policy HO3 in Section 5.</p>	113	<p>The Council has responded at CSPD stage (see document SD/009) and during the Examination hearings of March 2015 to the objectors proposed alternative housing distribution so these issues are not new. The Council considers its proposed housing distribution to be sound.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

		The written and oral evidence we provided for the Core Strategy EIP in March 2015 remain valid and appropriate at this stage.		
MM38-47 & 51		1. Blanket objections are made to these modifications. Comments relate to a lack of focus of brown field land, green belt release, and a lack of car parking at Burley and Menston stations.	77	The Council address these and other issues relating to the proposed housing targets for Burley and Menston under MM88.
MM38-47		1. Ilkley Design Statement Group make a blanket objection to these modifications. They object to the housing distribution.	26	The issues raised are dealt with under MM87 & MM8.
MM38 to MM56		1. The objector raises a blanket objection to these modifications. Expresses concerns over the modified housing distribution and redirection of houses from the Regional City to Wharfedale.	114	These issues are dealt with in detail in the section of the table for MM87 and MM88. The Council considers the re-distribution is supported by the updated evidence and the updated HRA and considers the overwhelming focus of the plan to remain on development within the main urban centres.
MM39	Policy BD1 Criterion B ShIPLEY & Canal Rd Housing target	1. Reference to the Shipley Eastern Relief Road is welcome.	96	Noted.
MM40	Policy BD1 Criterion C NE Bradford Housing target	1. Concerns are raised over the Bradford SE housing apportionment. The numbers in other parts of the Regional City that have been reduced should not have been reduced and this would facilitate a reduction in the Bradford SE target. Reference is also made by most of these	22, 28, 29, 31, 45, 53, 59, 72, 74, 79, 82, 84, 85, 87, 90, 93, 105, 112,	This issue is dealt with within the table dealing with modification MM87 & MM88.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

		respondents to increasing the numbers still further in those settlements in Wharfedale where increased targets have been proposed.	117	
MM41	Policy BD1 Criterion C	1. Supports the modification which describes the opportunity at Apperley Bridge.	108	Noted.
		The reduction in the Bradford NE housing apportionment has not been justified and is therefore unsound.	108	The reduction has been justified and is sound. See also MM88.
MM42	Policy BD1 Part C	1. Insertion of new Shipley section to policy		
		2. The modification is sound. It is essential that any sites which are selected as allocations and their design do not harm those elements which contribute to the Outstanding Universal Value of Saltaire. The Proposed Modification makes clear the need for any proposals to have due regard to the World Heritage Site.	9	Support noted.
		3. Concerns are raised over the Bradford SE housing apportionment. The numbers in other parts of the Regional City that have been reduced should not have been reduced and this would facilitate a reduction in the Bradford SE target. Reference is also made by most of these respondents to increasing the numbers still further in those settlements in Wharfedale where increased targets have been proposed.	22, 28, 29, 31, 39, 45, 53, 59, 72, 74, 79, 82, 84, 85, 87, 90, 93, 105, 112, 117	This issue is dealt with within the table dealing with modification MM87 & MM88.
		4. Comments are made by the objector to the status of a number of settlements as Local growth Centres, the appropriateness of their housing	86	The comments do not relate to the actual modification and in any case are incorrect. The housing requirement was not based

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

		targets and the fact that those housing targets were based on an assumption of jobs growth of nearly 3000 annually which has now been downgraded to 1600		on jobs growth assumption of 3000 per annum, the Edge Analytics modelling used an assumption from the REM of 1,604 and this is clearly documented in the Housing requirement Study reports. The settlements listed have in the Council’s view been logically and correctly classified as local growth Centres. See also the Council’s response to MM7 and MM8 and also to MM88.
MM43	Policy BD1 Criterion E5	1. Sound. This Proposed Modification now identifies which particular aspects of the heritage are of especial importance in this part of the District. We particularly welcome the reference to the Registered Battlefield at Adwalton Moor.	9	Noted
MM44	Policy AD1/A	1. Silsden & Baildon housing targets.		
		2. The modification is sound. The suggested change in the housing requirements for Baildon now provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire. It is considered that the housing requirements for Baildon are now likely to be compatible with both national policy guidance and the plan’s own Policies for the protection of the historic environment.	9	Support noted.
		3. Concerns are raised over the Bradford SE housing apportionment and arguments that housing numbers should have increased	101	The housing apportionment issues are dealt with under the table sections for MM87 & MM88.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

		elsewhere.		
		4. Objects to the failure to increase the housing provision in Cottingley.	34	The Council considers that there is no justification for an increase in the Cottingley housing apportionment of 200 homes.
		5. Objections are received to the proposed modification which reduces the Baildon housing target	94	The issues are dealt with under MM88. The Council considers that the reduction proposed is justified and responds to valid issues raised by English Heritage.
MM45	Policy AD1 Criterion B	1. Silsden housing target		Noted
MM46	Policy AD1 Criterion B	1. Supports the removal of reference to local need.	34	Noted
		The proposed modification provides greater clarity and removes uncertainty.	78	Noted
MM48	Policy AD1 Criterion D	1. Natural England support the modification to Criterion D (2) as follows:	24	Noted
		2. CEG would wish to see the modification amended as set out below in relation to MM53.		See response to MM53
MM49	Policy AD1 Criterion D6	1. Sound. This Proposed Modification now identifies which particular aspects of the heritage are of especial importance to the distinctive character of this part of the District.	9	Support noted.
		2. Given the issues relating to capacity of the Aire Valley Trunk Sewer in this area, we welcome and support the additional criterion for investment in Airedale.	62	Noted. The Local Infrastructure Plan recognises this issue.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

MM50	Policy AD2 New criterion G	1. Concerns are raised with regards to the proposed housing at Menston. Issues raised in relation to flood risk, drainage, groundwater flooding and the Council’s SFRA.	20	The comments do not relate to the actual modification. The Council consider that its SFRA is sound and that its housing distribution is justified and appropriate. Further comments and responses to flood risk issues are placed within other relevant sections of this document.
MM51	Policy WD1 Wharfedale settlements housing targets	1. Support for the Wharfedale housing target increase from 1600 to 2,500 and support for the increase in 3 out of the 4 settlements.	40, 41, 47	Noted
		2. Support for the proposed increase in the Wharfedale housing apportionment from 1600 to 2500.	58	Noted.
		3. General concerns over the increase in housing proposed for Wharfedale raising concerns over green belt, and environmental impact.	26, 55, 61, 63, 64, 69	The Substantive points are dealt with under MM88.
		4. Concerns are raised over the Bradford SE housing apportionment and arguments that housing numbers should have increased elsewhere.	101	The housing apportionment issues are dealt with under the table sections for MM87 & MM88.
		5. Objections to the increased Ilkley housing target, green belt, flood risk, infrastructure concerns, availability of brown field land in Bradford. One objector also questions the robustness and independence of the GVA housing requirement study	25, 35, 55, 68, 89	The Council considers that the proposed housing apportionment for Ilkley is sound. The issues are considered further addressed in the sections of the table for MM88. The criticisms of the GVA housing requirement study and its independence are not new. The views are ridiculous,

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

				unsubstantiated and professionally insulting to the team and individuals concerned. The work carried out by GVA and Edge Analytics is robust and in accordance with Government guidance contained within the NPPF and NPPG. This issue was also covered in the Council’s response to the CSPD reps in document SD/009
MM51 (Cont.)		6. Support for the increase in Ilkley’s housing apportionment from 800 to 1000 homes.	34	Noted.
		7. Objections to the proposed increase in the housing apportionment for Burley. Issues including settlement hierarchy, green belt, sustainability, infrastructure.	38, 56, 103	The Council considers that the proposed modification is justified and sound and Burley In Wharfedale is a sustainable location for growth. Issues relating to the objection are further addressed within the section of the table for MM88. Settlement hierarchy issues are dealt with under MM7 & MM8.
		8. These figures have been revised upwards without detailed explanation. They should have been raised further as there is considerable unsatisfied demand in the area compared to lack of demand and marketability in Bradford SE where numbers should be reduced,	39	Incorrect. The modifications are explained within document PS/G004a and relate to the revised HRA. No evidence is provided to justify the demand comments. While patterns of demand and marketability do need to be considered they are factors which will change over the lifetime of the Plan. More importantly the plan’s purpose is to reflect the district’s housing needs, and distribute housing in the most sustainable way and where new investment will help secure

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

				<p>regeneration. The focus on the Regional City and in particular Bradford SE reflects these matters.</p> <p>The objector makes no attempt to assess the suitability, sustainability, practicality and appropriateness of further significant increases in the Wharfedale housing figures.</p>
MM51 (Cont.)		<p>9. Concerns are raised about the housing apportionment for Menston, the increase in the proposed target from 400 to 600 units, impacts on green belt, flood risk issues and lack of employment and therefore lack of sustainability. Some respondents also refer to the settlement hierarchy and object to Menston being a Local Growth Centre.</p>	20, 71, 75	<p>The objections to the proposed increase in the Menston housing apportionment and the related issues are dealt with in table sections dealing with modification MM88. Settlement hierarchy is dealt with under MM7 & MM8.</p> <p>The Council considers that the proposals for Menston are sound.</p>
		<p>10. Support for the increase in Menston’s housing apportionment from 400 to 600 homes.</p>	34, 58	Noted.
		<p>11. Repeats CSPD objection with regard to the balance between job provision and housing numbers in Wharfedale. Main Modification MM51 is unsound, as it is seeking to increase the level of dwellings within Wharfedale without increasing or identifying sufficient new employment land to justify the increase. In any event, the increases should be made at a high level in Menston in view of its position in the settlement hierarchy, and that in turn should reduce the number of residential units to be allocated to Ilkley.</p>	91	<p>The Council disagrees. Such a simplistic link is not justified. The housing apportionment has to relate to a varied range of criteria, not just a single one. There is no justification in the Council’s view for an increased employment land figure. It would be unsustainable to increase the housing apportionment within a lower tier settlement such as Menston in favour of a higher tier more sustainable settlement such as Ilkley, particularly where there are sustainable opportunities</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

				in that higher order settlement to accommodate the proposed level of growth,.
		12. Objects to the Addingham housing target and considers this should have been increased following the revised HRA and modifications to increase the other 3 Wharfedale settlements.	65, 110	The substantive issues are dealt with under MM88. The Council considers the decision not to increase the Addingham housing apportionment is justified and sound.
		13. MMs 51 and 52 relate to the revisions to the overall distribution of housing in Wharfedale (alongside sources of supply), in accordance with the modifications made to Policy HO3. CEG welcome and support these modifications. In particular CEG support the modified housing figure for Burley-in-Wharfedale of 700 units, alongside the insertion of the additional text into Criterion B that the housing figure will be met by way of a ‘significant contribution’ from Green Belt changes.	104	Noted.
MM51 & MM52		1. Reiterate the matters and actions identified in the LCR Duty to Cooperate table contained in the Duty to cooperate statement in support of the Core Strategy. This highlights the on-going need to liaise and work on cross boundary issues (green belt and infrastructure) with Leeds CC as the Core Strategy is implemented through the Allocations Development Plan Document.	107	The representation does not raise objection to the modifications but rather restates the agreed approach for addressing cross boundary impacts as set out in the Duty to Cooperate Statement (SD/006), see in particular Appendix 4 which sets out the issues and agreed approach. No new duty to cooperate issues arise from modifications as already a recognised need to work through

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

				allocations on detailed cross boundary matters on both green belt change and infrastructure within these locations. The comments are noted.
MM52	Policy WD1 Criterion B	1. Concern over the proposed 900 increase in the Wharfedale housing apportionment.	26, 54, 55, 64	The increase and the comments are considered in the table for MM88.
		Concerns over the proposed Burley housing target and green belt loss. Objections also to Burley being classified a Local Growth Centre.	38, 103	Issues dealt with under MM7, MM8, and MM88
MM52 (Cont.)		2. These figures have been revised upwards without detailed explanation. They should have been raised further as there is considerable unsatisfied demand in the area compared to lack of demand and marketability in Bradford SE where numbers should be reduced.	39	See response above to MM51.
		3. Support for the increase in Menston’s housing apportionment from 400 to 600 homes.	34	Noted
		4. We support the amendment to Policy WD1 to recognise that there will need to be some local Green Belt changes in Menston. This is supported by the land supply data in the SHLAA.	58	Noted
		5. Concerns are raised about the Menston housing target. Issues raised include Menston’s status as a Local Growth Centre, changes to the HRA not justifying an increased housing target, green belt, landscape character and flood risk. Some respondents also refer to the settlement hierarchy and object to Menston being a Local Growth	20, 71, 75	These issues are dealt with in the tables dealing with settlement hierarchy (MM7 & MM8) green belt (MM17 MM18) and housing distribution (MM88).

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

		Centre.		
		6. Support for the increase in Ilkley’s housing apportionment from 800 to 1000 homes.	34	Support noted.
		7. Concerns are raised about the increased housing target for Ilkley with reference to flooding, infrastructure and green belt.	30, 35, 55, 67, 68, 106	These issues are dealt with in the tables dealing with green belt (MM17 MM18) and housing distribution (MM88).
		8. Objects to the Addingham housing target and considers this should have been increased following the revised HRA and modifications to increase the housing targets of the other 3 Wharfedale settlements.	65, 110	The substantive issues are dealt with under MM88. The Council considers the decision not to increase the Addingham housing apportionment is justified and sound.
		MMs 51 and 52 relate to the revisions to the overall distribution of housing in Wharfedale (alongside sources of supply), in accordance with the modifications made to Policy HO3. CEG welcome and support these modifications. In particular CEG support the modified housing figure for Burley-in-Wharfedale of 700 units, alongside the insertion of the additional text into Criterion B that the housing figure will be met by way of a ‘significant contribution’ from Green Belt changes.	104	Noted.
MM53	Sub Area Policy WD1 (Wharfedale) Criterion D (2)	1. Natural England support this modification set out below as proposed by the Council.	24	Noted
		2. Add further sentence at end of Criterion D (2) as follows:	104	The text as set out in the modifications is considered to be consistent with the

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

		<p><u>Avoid, through mitigation measures, adverse effects on SPA site integrity from the loss of important foraging land for SPA qualifying bird species within the SPA’s 2.5km zone of influence, and mitigate the impacts on SPA site integrity of increasing visitor numbers.</u></p> <p>Policy SC8 is the key policy in the Core Strategy for the protection of the South Pennine Moors SPA / SAC.</p> <p>Policy WD1 (Wharfedale), by contrast, is a general policy covering five policy areas for the Wharfedale area, one of which is “Environment” (the other four relate to strategic pattern of development, new housing, economic development and transport).</p> <p>The “Environment” limb of WD1 must therefore, in relation to SPA protection, reflect the approach of key Policy SC8. CEG’s comments made at MM33 apply equally to this policy.</p> <p>The Council’s amendment to Policy WD1, fails to recognise that protection is directed at SPA “site integrity” (not at supporting foraging habitat) and that an adverse effect on SPA integrity from loss of supporting foraging habitat for qualifying bird species can be avoided through mitigation measures such as provision of new or enhanced supporting foraging habitat. The proposes changes therefore bring the text in line with Policy</p>	<p>contents and approach identified in the HRA Review and advice from Natural England. The approach is underpinned by Regulation 102 and the process of making an assessment of the implications for European Sites of the policies and proposals in the core strategy. The measures that have been identified, including MM53, allow the authority to take account of the uncertainties relating to choice of sites, locations, full extent of development and current levels of data relating to foraging activity, inherent in a strategic plan and be able to exclude the risk of a significant effect on the conservation objectives of the Site. A competent authority must not agree to a plan or project unless it has ‘made certain that it will not adversely affect the integrity of the site’.</p> <p>The modification is not inconsistent with other modifications made or with the case law quoted, which relates to individual clearly defined development projects or proposals.</p> <p>The sub-area policy element relating to the environment identifies succinctly principles that will exercise an influence over decision-making in the area in a language that can be appreciated by the general reader. It responds to interest and concerns expressed about the project by amenity groups and local residents and is considered to already be sufficiently</p>
--	--	--	--

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

		<p>SC8, regulation 61, the relevant case law and the Council’s AA Nov 2015.</p> <p>Note that similar amendments are also needed to correct the same error in relation to: MM131 (Policy EN9: New and Extended Minerals Extraction Sites – here there should be no separate reference to “important foraging land within the SPA’s zone of influence”) MM132 (Policy EN9: New and Extended Minerals Extraction Sites – here there should be no separate reference to “important foraging land within the SPA’s zone of influence”) MM146 (Policy WM1: Waste Management – here there should be no separate reference to “important foraging land within the SPA’s zone of influence”)</p>		<p>qualified by use of the word important.</p> <p>The modification has been identified in the HRA Report and is supported by Natural England. The integrity test relating to the core strategy with modifications in the HRA Report has taken place with the measures identified in the report in place and is dependent on these being integrated into the plan. The amendment proposed is therefore rejected by the Council.</p> <p>The Councils response also applies to the further modifications referenced in CEGs comments ie MM131& 132 (Policy EN9 New and Extended Minerals Extraction Sites) and MM146 (Policy WM1 Waste Management).</p>
		<p>3. Concerns are raised about the increased housing target for Ilkley with reference to flooding, infrastructure and green belt.</p>	35, 55, 68	<p>The comments do not relate specifically to the modification concerned.</p> <p>These issues are dealt with in the tables dealing with green belt (MM17 MM18) and housing distribution (MM88).</p>
MM54	Policy WD1 Criterion D5	<p>1. Sound. This Proposed Modification now identifies which particular aspects of the heritage are of especial importance to the distinctive character of this part of the District.</p>	9	Support noted.
		<p>2. Concerns are raised about the increased housing target for Ilkley with reference to flooding,</p>	35, 55, 68	The comments do not relate specifically to the modification concerned.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

		infrastructure and green belt.		These issues are dealt with in the tables dealing with green belt (MM17 MM18) and housing distribution (MM88).
MM55		<p>1. Concerns are raised about the increased housing target for Ilkley with reference to flooding, infrastructure and green belt.</p>	35, 55, 68	<p>The comments do not relate specifically to the modification concerned.</p> <p>These issues are dealt with in the tables dealing with green belt (MM17 MM18) and housing distribution (MM88).</p>
		<p>2. BH&DWH strongly objects to Main Modification 55 as taken out of context it is considered that this downplays the role that Addingham can play in meeting housing need in Wharfedale.</p>	65	<p>The Council disagrees. Addingham has been apportioned an appropriate level of housing which reflects its position within Wharfedale, and its position at the north western periphery of the district. It is absolutely right that the higher order and more sustainable centres of Ilkley, Menston and Burley should see the majority of housing growth in the area.</p>
MM56	Policy PN1	<p>1. The modification is sound. The suggested change in the housing requirements for Howarth now provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which contribute to the character and landscape setting of this important settlement.</p> <p>It is considered that the housing requirements for Howarth are now likely to be compatible with both national policy guidance and the plan’s own</p>	9	Support noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

		Policies for the protection of the historic environment.		
		2. Our Client objects to MM56 which proposes to reduce the overall housing target for the South Pennine Towns and Villages from 3,500 units to 3,400 – in particular objects to the 100 reduction in the Haworth target.	109	The substantive issues raised are dealt with under MM88. The Council considers that the modification is sound and justified and reflects the valid concerns of English Heritage.
		3. Objections are made raising concern about the Wharfedale housing target.	26	The proposed modification does not deal with Wharfedale. See related responses under relevant modification.
MM57	Policy PN1 Criterion B	1. Our Client objects to MM57 which states that the level of housing that will be delivered in the local service centres of Cullingworth, Denholme and Haworth will be reduced from 1,200 to 1,100. The reduction for Haworth is not justified.	109	The Council disagrees. The substantive points are dealt with under MM88.
		2. Objections are made raising concern about the Wharfedale housing target.	26	The modification does not deal with Wharfedale.
MM58	Sub Area Policy PN1 (South Pennine Towns and Villages)	1. Natural England support the modification made by the Council to Environment Criterion 2 as follows:	24	Noted.
		2. CEG would wish to see the modification amended as set out above in relation to MM53.		See response to MM53 set out above.
MM59	Policy PN1 Criterion E4	1. Sound. This Proposed Modification now identifies which particular aspects of the heritage are of especial importance to the distinctive character of	9	Support noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 4 – Sub Area Policies

		this part of the District.		
MM61	Paragraph 4.4.5	1. The proposed modification provides greater clarity and removes uncertainty.	78	Noted.
MM62	Policy PN2	1. The proposed modification provides greater clarity and removes uncertainty.	78	Noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.1 – Economy & Jobs

The following table summarises the main issues raised in response to the main modifications proposed to the Core Strategy Publication Draft together with the Councils response. Where the issues relate to matters which have already been dealt with as part of the Examination to date this is made clear in the Councils response with reference to where this can be found.

The Proposed Main Modifications relate to the document published November 2015 (Document reference PS/G004a)
Policy and paragraph numbers relate to the Core Strategy Publication Draft as submitted (Submission Document reference SD001)

Proposed Modification No.	Policy / Paragraph	Main Issue	Respondent	Council’s Response
Section 5.1				
MM63	Policy EC1 Paragraph 5.1.4	1 The areas identified for future economic growth, Airedale, Bradford City Centre, in the M606 corridor and in the north east and South East Bradford – Leeds interface, are the areas where the impact of development is likely to have the greatest impact on the Strategic Road Network (SRN). Schemes in the governments Road Investment Strategy (RIS) will not provide sufficient additional capacity to cater for the impact of the Local Plan development in Bradford and other West Yorkshire Districts in the plan period, 2030. Where site development has a severe impact on the SRN, measures will be required to reduce and mitigate that impact.	13	When sites come forward for development in South Bradford, the Council will work with Highways England to identify and implement any mitigation measures to reduce impact on the SRN.
MM63	Policy EC1 and Policy EC3 Criterion A	2 Support The level of employment land allocated in Wharfedale should be reflected in the housing targets.	26	The housing requirement study for the District was based on an annual jobs growth figure of 1604 / annum as explained at the Examination hearings. The total amount of land to be allocated for employment purposes was determined by historic take up of land rather than the projected jobs growth in the REM. The amount of land allocated in

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.1 – Economy & Jobs

				Wharfedale was determined by current and relative population figures for the internal economic areas of the District (of which Wharfedale is one) and by the perceived demand for employment land and its take up in these locations.
MM63	Policy EC1 Paragraph 5.1.4	3 Clarification is needed for the term “South East Bradford – Leeds Interface”. The Council has been unclear about what its employment land use in or around the proposed Holme Wood urban extension will be. We believe that it is essential to alleviate local concerns and for consistency with the Tong and Holme Wood Neighbourhood Development Plan that it makes it clear that it has no intention of locating employment or commercial land within the Tong Valley. The Council should therefore make it clear that the South-East Bradford – Leeds Interface is not the interface which runs through the Tong Valley, and state in exact terms where this proposed economic growth area is.	39	The background paper, ‘Economy and Jobs’ (Ref SD018) sets out the wider spatial strategy for the distribution of employment land. It makes reference to the Leeds-Bradford Corridor and explains that Leeds and Bradford’s economic relationship is interrelated. There are certain areas within the District where this market activity is most concentrated and the south east quadrant of Bradford urban area is one of these locations, particularly in the M606 and A650 highway corridors. The forthcoming allocations DPD will identify the proposed amount of employment land which will be designated in these areas and the specific site size and locations.
	Policy EC1 Paragraph 5.1.4	4 In support of the Strategy, Leeds City Council propose to work with Bradford under the DtC process with particular regard to economic development in South East Bradford.	107	Noted
	Policy EC1 and Policy EC3 Criterion A	5 There is not sufficient employment land allocated to balance with the increase in housing proposed for Wharfedale.	91	See response to MM63 issue 2 above.
MM65	Policy EC2	1 An annual addition of 1600 new jobs in the District will have a substantial impact on trip	13	The jobs figures and their implications were discussed at the Examination hearings.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.1 – Economy & Jobs

		generation and attraction. It is not clear whether the reduction in the jobs target will have any transport implications including, increased out-commuting from Bradford District that might need to be addressed by adjustments to other policies and proposals.		There will be no impact as the jobs projections have simply been brought into alignment with REM forecasts and the assumptions already within the Housing requirement Study. The Core Strategy itself facilitates rather than create the jobs and the figure of 1600 per annum is a projection produced by the REM. The actual determination of the districts employment land requirement is determined by historic take up.
MM65	Policy EC2	<p>2 Bradford is the only city in Yorkshire where growth will reduce in 2016 from 1.6% to 1.4% suggesting that the annual jobs growth should be reduced from 1600 to 1400</p> <p>How can jobs growth so drastically be reduced by nearly half from 2897 to 1600? If it was aspirational and is linked to housing figures then there should be a reduction in the proposed housing numbers.</p>	26	See above. The adjusted and reduced jobs growth figures align with the housing requirement studies jobs growth assumptions within the REM.
MM65	Policy EC2	<p>3 A number of objectors state that reduction in the number of assumed jobs growth to 1600/year is a factor which changes the whole plan in terms of housing provision. They argue that the total number of houses to be built over the plan period should be reduced commensurately.</p>	52, 57, 63 69	<p>The comments are incorrect and misunderstand, both the assumptions underlying the housing requirement study and the reasons for the change in the quoted jobs growth assumptions.</p> <p>To be clear, there is no justification for a change to the housing requirement as the ‘Bradford District Housing Requirement Study (Ref EB033) and the projections underlying it carried out by Edge Analytics were NOT based on an annual jobs growth figure of 2,897 / annum. As indicated in Edge</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.1 – Economy & Jobs

				Analytics Report of September 2014, the jobs growth assumption, taken from the Yorkshire and Humber Regional Econometric Model was 1,604 jobs / annum. The Council acknowledged that the figure contained within Policy EC2 was aspirational and that the inclusion of the 2,897 figure was in retrospect mistaken. It accepted that there should be consistency between the jobs growth assumption referred to in the Core Strategy’s economic policies and those used in deriving the housing requirement. The change to Policy EC2 is therefore required to ensure consistency with the assumptions underlying the assessments of housing need. All of this was explained at the initial EIP hearings and indeed the issue of the REM model, its validity was also covered in those hearings and in original objections to the CSPD.
	Policy EC2	4 At MM 65, with reference to Policy EC2 the Council has reduced the estimated jobs delivery from 2897 per annum to 1600 per annum. This is insufficient to generate the net inward migration required to take population growth above that projected by the ONS and DCLG. Therefore the DCLG household formation projections should be accepted and the housing numbers reduced accordingly	80	The objector’s analysis and assumptions are incorrect and flawed. The jobs growth assumptions underlying the housing requirement study were never based on the higher figure within Policy EC2. Moreover, in line with Government guidance within the NPPG, the Council has to, and indeed has, taken into account a range of factors and data in making its objective assessment of need. As important as they are, it cannot assess housing need solely by reference to the DCLG household projections.
	Policy EC2	5 Exceptional circumstances to green belt releases for housing in Baildon would appear to be unnecessary as a result of the significant alteration to the projected rate of jobs growth in	96	See above. The jobs growth assumptions which underpinned the housing requirement study have not changed and there is therefore no justification to change the

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.1 – Economy & Jobs

		the District as shown in MM65 and MM67.		housing requirement.
	Policy EC2	<p>6 We object to this significantly reduced figure within Policy EC2 and maintain our position that the job growth should broadly align with the Experian Economic Forecast (December 2014) of an annual job growth of 2,168. As stated in our Core Strategy Examination Statements, we agree with NLP that the aspirational target job growth of 2,897 resulting in a 0% unemployment rate is unrealistic. However, we consider that our conclusions remain valid that there are factors operating in Bradford which support a higher jobs growth total, a little way above the Experian projection of 2,168. The selection of an approximate mid-point between the high aspiration figure of 2,897 and the now proposed 1,600 is appropriate for the following reasons:</p> <ul style="list-style-type: none"> - This aligns with the expert evidence available - The selection of a figure which has a significant but realistic degree of aspiration is necessary to achieve a better balance between homes and jobs and a higher level of containment in terms of commuting within the District. This will be an appropriate and sustainable outcome. - The levels of educational achievement, aspiration and business start-ups in key cohorts of the BME population are a key job growth driver and an important component of the enhanced housing requirement we are advocating. 	113	<p>The argument that a higher jobs growth assumption should be adopted is not a new issue and was discussed and covered within the original Examination hearings.</p> <p>The jobs growth figure the Council has used is derived from the REM. While REM runs vary it is important to ensure that jobs growth assumptions are not unrealistic otherwise the resultant housing provision will be too high leading to the unnecessary release of green field and green belt land. Given that the district has seen jobs growth at a level lower than that regionally or nationally since the recession, it is clear that care needs to be taken in selecting the most appropriate jobs growth assumptions. The district is still undergoing a process of economic recovery and regeneration.</p> <p>The various jobs growth drivers listed are taken into consideration when producing REM projections for the District.</p>
MM66	Policy EC2	<p>1 An annual addition of 1600 new jobs in the District will have a substantial impact on trip generation and attraction. It is not clear</p>	13	<p>The jobs figures and their implications were discussed at the Examination hearings. The Core Strategy does not create the jobs and</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.1 – Economy & Jobs

		whether the reduction in the jobs target will have any transport implications including, increased out-commuting from Bradford District that might need to be addressed by adjustments to other policies and proposals.		the figure of 1600 per annum is a projection produced by the REM. The actual determination of the districts employment land requirement is determined by historic take up.
MM66	Policy EC2	2 Bradford is the only city in Yorkshire where growth will reduce in 2016 from 1.6% to 1.4% suggesting that the annual jobs growth should be reduced from 1600 to 1400 How can jobs growth so drastically be reduced by nearly half from 2897 to 1600? If it was aspirational and is linked to housing figures then there should be a reduction in the proposed housing numbers.	26	See response to MM65 issue 2 above.
	Policy EC2	3 The original housing figures were based on 4200 jobs per annum. The reduction in the estimated jobs is reduced to 1600 therefore there should be a reduction in the housing figure.	57	The link between jobs growth and housing provision is discussed above.
	Policy EC2	4 We object to this significantly reduced figure within Policy EC2 and maintain our position that the job growth should broadly align with the Experian Economic Forecast (December 2014) of an annual job growth of 2,168.	113	See response to MM65 issue 6 above.
MM67	Policy EC2	1 Exceptional circumstances to green belt releases for housing in Baildon would appear to be unnecessary as a result of the significant alteration to the projected rate of jobs growth in the District as shown in MM65 and MM67.	96	The comments are incorrect and misunderstand, both the assumptions underlying the housing requirement study and the reasons for the change in the quoted jobs growth assumptions. See MM65 point 3 above.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.1 – Economy & Jobs

MM69	Policy EC3 Criterion A	1 Support	26	Noted.
		2 The housing allocation has increased for Wharfedale / Burley in Wharfedale but the employment allocation remains the same which implies the dwellings will be for commuters or retired occupants.	56, 70	The jobs figures and their implications were discussed at the EIP hearings. The Core Strategy does not create the jobs and the figure of 1600 per annum is a projection produced by the REM. The actual determination of the districts employment land requirement is determined by historic take up.
	Policy EC3 Criterion A	4 The plan seeks to increase the level of housing within Wharfedale without identifying sufficient new employment land to justify the increase.	91	The level of allocation of employment land within Wharfedale is considered appropriate. The Council considers that it would not be sustainable to direct more employment development to Wharfedale at the expense of the Regional City which is the district main economic focus and in most acute need of regeneration.
	Policy EC3 Criterion A	5 Burley employment land requirement in the current Core Strategy was part of the 5ha in the Wharfedale corridor and was linked to housing need of 200 new homes over the next 15 years. In the modifications there is still a requirement for 5ha in the Wharfedale corridor but the housing requirement in Burley as an example has gone up from 200 to 700 new homes. If the employment had increased via Policy EC3 one could understand the increased housing need but the same employment land cannot suddenly require an additional 500 new homes. The employment land is still the same but the housing need brought about by employment has increased	103 (445)	The Core Strategy does not make a specific employment land allocation to Burley. It will be for the Allocations DPD to determine where that allocation should be. Furthermore the approach to housing distribution included a variety of criteria but there was no direct link between numbers of hectares of employment land proposed and housing targets. Therefore changing the housing target is not dependent on changing the employment land allocation. Housing needs were assessed at a district wide level. Local housing needs assessments were not carried out.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.1 – Economy & Jobs

		by 182%. It does not make sense!		<p>Within the Wharfedale area land will need to be identified not only for housing and employment but also for open space and community facilities such as new schools. Allocations therefore need to be judged having regard to all uses. The main determinant of the housing target changes was the revised HRA and the fact that the previously drawn HRA had made incorrect assumptions about the likelihood of impacts on the HRA from the planned housing development.</p> <p>The spatial strategy for the distribution of employment land is set out in the Core Strategy Background paper 3, Economy and Jobs. The main supply of employment land will be linked to the central economic axis which runs through the District from Keighley in the north through Airedale, Bradford urban area and its interface with Leeds. There are also business links to the Leeds Bradford airport in the north. Wharfedale is not considered a major location for new inward investment in economic development.</p>
	Policy EC3 Criterion A	<p>6 Support. However, representation maintains view that 10ha of employment land is required in Wharfedale as stated in our previous Examination statement, rather than only 5ha as currently proposed. This is fully justified by the evidence base and the needs of the market, and further justified by the increased housing figures proposed in Wharfedale. The</p>	113 (447)	<p>See above responses above.</p> <p>There is no justification to add the terms ‘at least’ to the text.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.1 – Economy & Jobs

		distribution of the 135ha to City of Bradford; Airedale corridor and the Wharfedale corridor should also be referred to as ‘at least’ within Policy EC3 Criterion A.		
	Policy EC3 Criterion A	7 An additional employment land supply should be identified as part of the land to be safeguarded for residential and employment land requirements beyond the end of the plan period. This additional component should comprise at least 5 years supply. Assuming adoption in 2016 the annual supply equates to 9.64 hectares. Therefore the five year additional supply is $5 \times 9.64 = 48.2$ hectares.	113 (447)	There is no justification to include a further 5 years supply of safeguarded employment land at the end of the plan period. Policy EC4 (B) will ensure that a long term supply of suitable employment land will be available and protected. The matter of safeguarded land was considered at the examination hearings.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

The following table summarises the main issues raised in response to the main modifications proposed to the Core Strategy Publication Draft together with the Councils response. Where the issues relate to matters which have already been dealt with as part of the Examination to date this is made clear in the Councils response with reference to where this can be found.

The Proposed Main Modifications relate to the document published on the 25th November 2015 (Document reference PS/G004a)

Policy and paragraph numbers relate to the Core Strategy Publication Draft as submitted (Submission Document reference SD001)

Proposed Modification No.	Policy / Paragraph	Main Issue	Respondent	Council’s Response
Section 5.3				
MM72	Policy HO1 Supporting text paragraphs 5.3.11 – 5.3.14	<p>1. 1. Several general comments are made:</p> <p>Agree factors including deliverability should be considered.</p> <p>Support an uplift in housing need / target, as set out in our RIP statements</p>	34	The comments are noted.
MM72		<p>2. Support the addition of housing market indicators, drivers and signals</p>	34	Support noted and welcomed.
MM72		<p>3. Our Client agrees with MM72 which states that factors such as feasibility, deliverability and Green Belt review should be taken into consideration when determining the scale of new housing provision.</p>	109	Noted.
MM72 & MM74		<p>4. A number of objections are made restating earlier objections which suggested that the housing requirement should have been set at a higher level.</p>	<p>Reps made to MM72 :104, 113</p> <p>Reps made to MM74: 34, 108</p>	The Council considers that there is no justification for a modification to the housing requirement figure within Policy HO1 and considers it to be a fair reflection of sound robust and objective assessment of housing need in the district over the period to 2030.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM72		<p>5. One objector states that since the Examination closed in March 2014 significant evidence has emerged which further justifies their position that the housing requirement should in fact be 47,000 over the plan period. The latest ONS figures for the UK on net international immigration demonstrate, as expected by several consultants, that the number of in-migrants were considerably under-estimated in the year to March 2014 by 71,000 and in the year to March 2015 by 165,000 (a circa 100% increase).</p> <p>This has a significant impact on the number of households needing to be housed in Bradford across the plan-period to 2028.</p> <p>The objector acknowledges that it is not possible to assess with any precision the extent of that impact over the remaining 14 years of the plan period as we do not know how many of the immigrants coming into Bradford will join existing households and how quickly they might form new households and also we do not know how long this heightened trend of net immigration will continue. That said, Bradford is one of those authorities where net international immigration is most likely to be above the national average rate due to the existence of strong ethnic communities and existing family ties.</p>	113	<p>During the examination hearings the issue of migration data was discussed at some length. In particular the issue of un-attributable population change which had occurred between the census was discussed and it was highlighted that there were very significant differences in outcomes between local authorities, even between authorities within the same region. This Council considers that this underlines the danger in the absence of locally specific data of making assumptions that national patterns will be replicated within a specific area.</p> <p>In effect the objector acknowledges that there is no new Bradford specific data and therefore it would be inappropriate to consider a change to the Core Strategy’s housing requirement on this basis alone. Moreover there is little justification for an argument to increase the housing requirement still further when the Council has already chosen an annual target which lies towards the top end of the range of tested scenarios (see page 22 of document EB/033) and well above the annual target which would be derived from the 2012 based sub national population projections.</p>
		<p>6. A number of objections have been made containing claims either that the data within the housing requirement study has been manipulated to justify the scale of proposed development or have contained errors and that projections have been inflated.</p>	20, 69, 80	<p>The Council notes both that similar claims were made in representation to the CSPD and that the claims are both vague and unsubstantiated. It also notes that the housing requirement figure of 42,100 is not the subject of a main modification.</p> <p>The Council has clearly set out the process by which it has determined its housing requirement and within the various iterations of</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM72 (Cont.)				<p>the Housing Requirement Study the data sources and assumptions are set out and justified. The key data used in the studies relates either to the sub national population and household projections issued by the Government and the Office for National Statistics (ONS) or the Yorkshire and Humber Regional Econometric model (REM). The Council has also explained and justified the use of these sources highlighting the guidance within the NPPG and emphasising that the approach taken by GVA / Edge Analytics is one which is being used across the Leeds City Region.</p>
		<p>7. A number of objections have been made relating to modification MM65 and suggesting that the Council has reduced its assumptions with regards to annual jobs growth and therefore the housing requirement should also have been reduced.</p> <p>It is claimed that the Housing Requirement Study used assumptions of jobs growth of 2,897 / annum to derive the housing requirement and to support an assumption of population and household growth above the level projected by the ONS & DCLG.</p> <p>The objectors argue that more realistic estimates of circa 1,600 per annum (MM65) based on the REM mean that the Council can no longer no longer argue that the population growth it posited will occur but despite this it has not reduced the housing targets accordingly.</p>	52, 69, 86	<p>The comments are incorrect and misunderstand both the assumptions underlying the housing requirement study and the reasons for the change in the quoted jobs growth assumptions.</p> <p>To be clear there is no justification for a change to the housing requirement as the housing requirement study and the projections underlying it carried out by Edge Analytics were NOT based on an annual jobs growth figure of 2,897 / annum. As indicated in Edge Analytics Report of September 2014 (reference EB/033) the jobs growth assumption, taken from the Yorkshire and Humber Regional Econometric Model was 1,604 jobs / annum. At the Examination hearings, the Council acknowledged that the jobs creation figure contained within Policy EC2 was aspirational and was higher and not consistent with that contained within the Housing requirement Study. It acknowledged that the inclusion of the 2,897 figure within Policy EC2 was in retrospect mistaken. It accepted that there</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM72 (Cont.)				<p>should be consistency between the jobs growth assumption referred to in the Core Strategy’s economic policies and those used in deriving the housing requirement..</p> <p>The Council is pleased that some of the objectors appear to accept that the Yorkshire & Humber REM jobs growth projections are reasonable and realistic. The REM is the model used consistently by local authorities within the Leeds City Region in both their planning work and in the production of the LCR Strategic Economic Plan (SEP).</p>
		<p>8. The recent trend of job creation in Bradford District is extremely poor and does not support the projections of household growth or housing need.</p>	20	<p>First of all the job creation estimates apply to the plan period and there will be fluctuations on a yearly basis linked to changes in the economy both locally and nationally.</p> <p>The Council considers that the REM forecasts are realistic. In actual fact, data from the Council’s economic development unit suggest that while the rate of jobs growth in the district has not matched that regionally or nationally in years following the recession, jobs growth has not been too far from that envisaged by the REM model. The 2012 to 2014 jobs period saw jobs growth of 5,200 in the private sector being offset by job losses of 1700 in the public sector. Account should also be taken of the growing and strengthening regeneration of the city centre which has been evident in the run up to and subsequent to the opening of the Broadway shopping centre.</p>
		<p>9. The housing numbers exceed the number of households projected by the DCLG – DCLG projections of household growth should be accepted and housing number set</p>	86	<p>The Council disagrees. This is another issue and point which has been discussed at the original Examination hearings. Guidance</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM72 (Cont.)		accordingly – a maximum of 30,000		issued by the Government within the NPPG is clear that although the official CLG household projections are a key component in determining housing need, there are also a range of other criteria, indicators and sources of data which should be used. The approach taken within the Council’s Housing requirement study takes account of both the latest sub national population and household projections but also other relevant information such as local economic projections and housing market indicators
		10. The objector makes an assertion that there is no justification for green belt deletions based on a number of claimed deficiencies in the analysis underpinning the Council’s housing requirement:	86	The Council does not accept this point. It considers that the analysis underpinning the housing requirement is robust and reasonable and that there are clear and demonstrable exceptional circumstances which justify a review of the green belt in order to release land to meet the district’s development needs.
		11. A number of objectors point to the guidance within the NPPF which states that “ <i>local planning authorities should, through their local plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the framework as a whole or specifically – this includes policies regarding land designated as green belt, HRA and prevention of flooding</i> ” - all of these issues directly affect Ilkley, the	35, 55, 80	This is an issue which was covered in some detail within the initial Examination hearings. The Council considers that the district’s development needs cannot be met without releasing land from the green belt. However it takes the view, based on the evidence within the Bradford Growth Assessment and within the revised HRA, that meeting these needs and releasing green belt land to do so would not result in the sort of adverse impacts which would significantly and demonstrably outweigh the benefits of planning to meet the district’s needs in full.
		12. it is unclear on what basis the estimate of 11,000 homes being required on green belt, and disproportionately applied across the District, is not judged to be of a	35, 55, 80	The Council does not consider that this is the right approach or way to address the issue. Government guidance within the NPPF is clear

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM72 (Cont.)		sufficient disadvantage to merit consideration of a less ambitious District-wide new homes target		that Council’s should plan positively to meet the development needs of their area. The Council considers that evidence such as the Bradford Growth Assessment indicates that there is plenty of scope to make changes to the green belt in sustainable locations and in a manner which would not undermine the strategic functioning of the green belt.
		13. In respect of the new paragraph 5.3.16 “Having regard to evidence....the Council considers that the level of need can be accommodated and delivered”. We do not see how the Council can properly come to this conclusion, as it has not yet given consideration to the views of neighbouring authorities on Green Belt release.	39	The Council and its partners within the Leeds City Region have devised a process to identify, record and respond to planning issues of mutual interest within their emerging plans and in particular those which may have significant cross boundary implications. It has also shared evidence. The need for and implications of green belt releases within the district is one such issue which has been discussed. (see document SD/006) No objections have been received from any of these adjoining local authorities either to the principle or proposed scale of green release set out within the plan.
		14. The National Planning Policy Framework is clear in its protection of Green Belt and the necessity to meet housing targets on its own is not enough to get rid or override Green Belt protection.	79	The Council has pointed out both within the original Examination hearings and within the revisions set out in modifications MM17 & MM18 that the NPPF accepts that it is both appropriate and legitimate in principle for Local Planning Authorities, when producing their Local Plans, to propose changes to the green belt where there are exceptional circumstances to do so. The Council has set out what those exceptional circumstances are, it has shown that it has assessed what the implications of meeting its needs in full via a review of the green belt might be, and it has taken account of the positive social and economic benefits to the district of meeting those needs.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM72 (Cont.)		15. Overcrowding and consequent unmet housing needs within the Bradford urban area will not be resolved nor met by building new houses in Wharfedale.	26	There is nothing in the plan or the modification to suggest that this would be the case. However the Council maintains that the overall scale of housing need should be informed by real indicators such as the level of overcrowding within urban parts of the district and this is precisely why the housing targets in Bradford are so high and indeed so much higher than those within Wharfedale.
		16. A number of respondents have quoted MM72 on their forms and suggested objection to it without mentioning or referring anything within or actually connected to the content of this modification.	22, 26, 28, 29, 31, 35, 45, 53, 59, 72, 74, 79, 82, 84, 85, 87, 90, 93, 105, 112	The Council cannot comment but points to the other sections of this table where the concerns and issues raised by the objectors relating to housing development and green belt change are dealt with.
MM73	Paragraph 5.3.14 & 5.3.15	1. The Housing Requirement Study has overlooked the fact that if unemployment carried on at a high level then migration out of the district will follow	5	The point is not relevant. The population projections produced by the ONA are trend based and within the district there is an established pattern of migration out of the district to other parts of the UK and this in part reflects economic circumstances within the district. However domestic net out migration from the district has been more than outweighed by international migration and these international migration patterns are quite established given the ethnic make of the district’s existing population. Furthermore the Housing Requirement Study makes modest but realistic assumptions about economic recovery and these are outlined within document EB/033. Indeed unemployment has been falling within the district over the last year.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM73 (Cont.)		<p>2. Overcrowding is shown to be higher in certain part of the city but this may not be caused by lack of houses but by cultural issues / choice.</p>	5	<p>While it is reasonable to suggest that patterns of overcrowding have numerous causes there has been a clear diversion in recent between household growth within the district and net housing completions. Completions have been particularly low within the Regional City. There is a clear and pressing need for new homes within the Regional City and the SHMA indicates that the greatest quantum of need for affordable homes are within this area.</p>
		<p>3. The modification is considered unsound as the housing requirement remains the same as that proposed within the submission version of the plan.</p>	78	<p>Modifications have only been proposed where there is clear justification for doing so and where those modifications are necessary to ensure that the Plan’s strategic policies are sound. There are no reasons to suggest that the housing requirement is not sound and hence no modification has been proposed.</p>
		<p>4. Since the examination hearing sessions the ONS have recently announced that net migration to the UK is substantially higher than previously estimated. This is particularly important within Bradford where Un-attributable Population Change (UPC), often attributed to international migration, has consistently been an issue for Bradford and has led to constant annual uplifts to the population (paragraph 2.6, EB033). Furthermore international migration has also constantly been assumed to be positive within Bradford (figure 3, EB033). Therefore any under-assumption of international migration nationally could have a significant effect upon the population and housing needs of Bradford.</p>	78	<p>During the examination hearings the issue of migration data was discussed at some length. In particular the issue of un-attributable population change which had occurred between the census was discussed and it was highlighted that there were very significant differences in outcomes between local authorities, even between authorities within the same region. The Council considers that this underlines the danger in the absence of locally specific data of making assumptions that national patterns will be replicated within a specific area.</p> <p>The Council assumes that the HBF would concur with Johnson Brook, who are representing a number of the HBF’s members, who have acknowledged that there is no new Bradford specific data has been issued. The</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				<p>Council therefore considers that it would be inappropriate to consider a change to the Core Strategy’s housing requirement on this basis alone.</p> <p>Moreover there is little justification for an argument to increase the housing requirement still further when the Council has already chosen an annual target which lies towards the top end of the range of tested scenarios (see page 22 of document EB/033) and well above the annual target which would be derived from the 2012 based sub national population projections.</p>
		<p>5. To make this modification compatible with the NPPF requirement for positive planning and to boost significantly housing supply, as well as main modification MM86, it is recommended that the housing requirement be expressed as a minimum.</p>	78	<p>There is no need to make this change. Policy HO1 has already established this point by using the phrase ‘at least’.</p>
MM75	Page 166 Table HO3	<p>1. Support the changes relating to increased targets for Ilkley, and Menston.</p>	34	Noted.
		<p>2. Barton Wilmore on behalf of Persimmon Homes support this modification and make reference to their support for the housing target changes for Ilkley and Menston.</p>	34	Noted.
		<p>3. A number of representations / representation forms have been received which specify an objection to MM75 as a consequence of their objections to changes in the settlement hierarchy made by modifications MM7 to MM9. (MM7-9 have upgraded Menston and Burley in Wharfedale to local Growth Centres and increased the proposed housing requirements accordingly). As the change to these tables is consequential, the objections are recorded and responded to within the relevant section dealing with the strategic core policies and the housing policies.</p>	26, 75, 113	<p>See entries responding to modifications MM7-9 and with respect to Johnson Brook’s comments which relate to the housing targets with certain settlements the Council’s response can be found under modifications MM87 and MM88 which deal with changes to Policy HO3</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM76	Paragraph 5.3.56	1. Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).	24	Support noted.
		2. Support this modification which removes reference from Paragraph 5.3.56 to significant parts of the District being ruled out from accommodating significant additional development due to the resultant impacts upon the South Pennine Moors SPA/SAC. The modification is consistent with the revised AA of November 2015 which in relation to Burley in Wharfedale and other areas indicates that the SAC / SPA is unlikely to represent a significant constraint to development.	104	Support noted.
MM77	Page 168 Table HO4	1. Historic England state that the proposed modification to the table is sound as it reflects the suggested reduction in the housing requirement for Shipley - now provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire.	9	Support noted.
		2. Keyland Developments continues to object to the proposed reduction in housing numbers for North East Bradford. This has not been justified and is therefore unsound.	108	The Council disagrees. The change has been fully justified, and is sound. The reduction in the Bradford NE target relates to a decrease in the potential available deliverable and developable land supply in the updated SHLAA 3 compared to the picture within SHLAA 2.
MM78	Paragraph 5.3.59	1. MM78 makes changes to the supporting text which are needed as a consequence of adjustments to the Housing distribution under Policy HO3 and to reflect the revised HRA. Two representations have been received which make comment against specified ranges of modification numbers including this one MM78. However in neither case do the respondents make any specific reference to the change within MM78 itself. Ilkley Design Statement Group raise concerns about the housing requirement,	26, 113	The matters raised are not directly related to the amendments within MM78 and the issues are deal with in other sections of this table. The Council are satisfied that its proposed housing distribution represents a sound and sustainable approach which reflect the evidence base and the revised HRA. The changes within MM78 are therefore also considered both necessary and sound.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		housing targets in Wharfedale, brownfield land targets and traffic congestion. Johnson Brook provide a restatement of their earlier alternative housing distribution which itself relates to a higher overall district wide housing requirement.		
MM79	Paragraph 5.3.60	1. The Proposed Modification reflects the reduction in the housing requirements for Shipley which is necessary in order provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire.	9	Support noted.
		2. An unfair and disproportionately high number of houses are being distributed to SE Bradford, and in particularly the Tong Valley, which is not sustainable in community terms and will not be adequately supported by the infrastructure envisaged.	22, 28, 29, 31, 39, 45, 59, 70, 74, 79, 82, 84, 85, 87, 90, 93, 105, 112, 117	<p>The Council notes that this in an argument which was made in representations to the CSPD and at the initial EIP hearings. The Council’s response is set out within document SD/009 at page 88 of Appendix 7J. It is repeated below:</p> <p>“The Council does not consider that he proposed target of 6,000 is disproportionately high. The target does lie above the baseline population proportionate target however this reflects the circumstances of both this sub area as one of the most sustainable locations for growth and reflects the circumstances within the other Bradford sub areas where land supply is more constrained. The proposal therefore reflects the evidence base and is both justified and effective.”</p> <p>The Council considers that there was no evidence or justification for a reduction in the proposed housing requirement for Bradford SE. The text changes within MM79 on the other hand –2 reflect instances where there is</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				evidence for and a justification for changes to the housing distribution such as at Shipley.
MM80	Paragraph 5.3.61	<p>1. Three objections have been received which have listed this modification but none actually relate to the modification itself.</p> <p>Respondent 66 makes number of points which raise concerns about the proposed housing requirement for Bradford SE and which concern green belt, and the impacts of development in the Tong Valley.</p> <p>Respondent 98 considers that the number of homes proposed for Bradford SE is disproportionately high and following other modifications even more disproportionately high.</p> <p>Respondent 66, the Ilkley Design Statement Group make reference to this modification but their substantive points are concerns about the housing requirement, green belt, housing targets in Wharfedale, brownfield land targets and traffic congestion.</p>	26,66, 98	The comments are not directly relevant to the modification which is just a factual correction of the title of the study. The substantive points raised are dealt with elsewhere in this table, in particular in the sections dealing with the green belt (MM17 & MM18) and the housing distribution (MM87 & MM88)
MM81	Page 169 Table HO5	<p>1. Support the proposed increase in housing target for Ilkley to 1,000.</p>	34	Noted.
		<p>2. Respondents 26 and 33 make reference to this modification number but their comment and points relate to concerns over the Ilkley housing targets and matters such as green belt, infrastructure and flooding. These matters are dealt with elsewhere within this table in particular MM88 which deals with the changes to Policy HO3.</p> <p>Respondent 39 makes reference to this modification number but their substantive points relate to concerns over the housing target for Bradford SE and green belt</p>	26, 33, 39	MM81 is a modification which changes the figures within table HO5 as a consequence of changes to the housing distribution and an increase in Ilkley’s proposed housing target from 800 to 1,000. The substantive issues raised are dealt with in other sections of the table in particular under MM87 and MM88.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		deletions in the Tong area. These points are dealt with under MM87.		
MM82	Paragraph 5.3.62	1. Respondents 26 and 39 make reference to this modification number but their comment and points relate to concerns over the Ilkley and Bradford SE housing targets.	26, 39	These matters are dealt with elsewhere within this table in particular MM87 & MM88 which deal with the changes to Policy HO3.
MM83	Page 170 Table HO6	1. Support the changes and addition of Menston.	34	Support noted.
		2. A number of representations / representation forms have been received which specify an objection to MM83 as a consequence of their objections to changes in the settlement hierarchy which have upgraded Menston and Burley in Wharfedale to Local Growth Centres and increased the proposed housing requirements accordingly. In the case of Menston those objections primarily relate to issues of flooding. The objectors consider that the revised HRA alone does not warrant a change in the settlement hierarchy for these centres and thus their increased housing targets. Following the Habitat Regulations Assessment (HRA) it was established that an additional 200 houses in Burley is compatible with the designation as a Local Service Centre and Rural Area. The re-designation as a Local Growth Centre is unsound because it is based on revisions to the HRA and pays no attention to the nature of the settlements or the principles of the Settlement Hierarchy.	51,75, 77	As the change to Table HO6 under this modification is consequential to the main modifications dealing with the settlement hierarchy (MM7 & MM8) and the housing distribution (MM88) the points raised are recorded and responded to within the relevant section of this table. The Council does not agree with the comments made. The nature of Burley, its location, its services, its accessibility to higher order centres, its position on the rail network and so on entirely warrant its placement within tier 3 of the settlements hierarchy. Its omission from this tier was the result of the analysis within the then most up to date HRA and the evidence underpinning it but these elements have since seen substantive change. In the case of Menston the Council does not agree with the view that the SHLAA sites which have been the subject of recent planning applications are undeliverable.
		3. The increase in housing numbers for Burley are defended as part of Policy HO3, which is baseline distribution for housing requirements based solely on population. It is	70,103	The objectors are mistaken in their interpretation.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		acknowledged that Burley population has increased since publication of the Core Strategy in February 2014, it has not increased by c.180%. The extrapolation is unsound and cannot be used as justification.		<p>The baseline distribution set out in Core Strategy supporting text reflects the share of the 42,100 homes Burley would be assigned if based solely on its share of the district wide population at the 2011 census. In Burley’s case this would be 518 homes (see Core Strategy Table HO3)</p> <p>The population proportionate target within Tables HO3 to HO7 have NOT been re-calculated as they are a 2011 related census benchmark. However the tables show how the housing targets within Policy HO3 differ from this notional population proportionate figure and since the modifications have changed some of those housing targets the tables also need amending.</p> <p>At no point is the Council arguing that the proposed increase in the housing target from 200 to 700 is in response to population increase since 2011.</p>
		4. Respondent 66, the Ilkley Design Statement Group make reference to this modification but their substantive points are concerns about the housing requirement, green belt, housing targets in Wharfedale, brownfield land targets and traffic congestion.	26	The issues raised are dealt with in the parts of this table relating to MM17, MM18 and MM88
MM84	Paragraph 5.2.63	1. Natural England welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA).	24	Support noted.
		2. Support the addition of Ilkley and Menston	34	Support noted.
		3. Objects to the change in status of Menston and Burley within the settlement hierarchy. The change to Local growth Centres has not been justified.	95	The Council considers that in the light of the revisions to the HRA there are there are clear reasons both to re-classify these two centres

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				and adopt propose housing targets as a result. The Council considers that both are accessible centres with scope for sustainable growth. The settlement hierarchy issues are dealt with in those sections of the table dealing with MM7 & MM8.
		4. Respondent 66, the Ilkley Design Statement Group make reference to this modification but their substantive points are concerns about the housing requirement, green belt, housing targets in Wharfedale, brownfield land targets and traffic congestion.	26	The issues raised are dealt with in the parts of this table relating to MM17, MM18 and MM88
MM85	Page 170 Table HO7	1. Historic England state that the suggested change in the housing requirements for Baildon and Howarth now provide a greater degree of confidence that sufficient land will be able to be identified to meet their respective totals without harming the Outstanding Universal Value of Saltaire in the case of the former, or the character and landscape setting of Howarth in the case of the latter.	9	Support noted.
		2. Recognise the need to delete Menston from the table due to its revised status / its upgrade to a Local Growth Centre.	34	Support noted.
		3. Our Client objects to MM85 which proposes to amend Policy HO7 so that it reflects the amendments that are being proposed to the settlement hierarchy.	109	The reduction to Haworth’s housing figure is covered in detail in MM88.
		4. Local service centres will now deliver approximately 1,500 less dwellings than originally proposed due to Burley-in-Wharfedale and Menston being elevated to local growth centres, and the reduction in delivery in Haworth and Baildon.	109	As the objector well knows this is a misleading and spurious comparison. The Local Service Centres are providing 200 less dwellings on a like for like comparison. This is a relatively minor change and affects only of the 11 Local Service Centres but which is based on sound reasons related to the concerns of English Heritage.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		5. Respondent 66, the Ilkley Design Statement Group make reference to this modification but their substantive points are concerns about the housing requirement, green belt, housing targets in Wharfedale, brownfield land targets and traffic congestion.	26	The issues raised are dealt with in the parts of this table relating to MM17, MM18 and MM88
MM86	Policy HO3	1. The HBF supports the inclusion of the words ‘at least’ prior to the housing requirement. This is considered a positive statement and is more consistent with the NPPF.	78	Support noted.
		2. CEG support the modification.	104	Support noted.
		3. Respondent 66, the Ilkley Design Statement Group make reference to this modification but their substantive points are concerns about the housing requirement, green belt, housing targets in Wharfedale, brownfield land targets and traffic congestion.	26	The issues raised are dealt with in the parts of this table relating to MM17, MM18 and MM88
		4. Respondent 66, the Ilkley Design Statement Group make reference to this modification but their substantive points are concerns about the housing requirement, green belt, housing targets in Wharfedale, brownfield land targets and traffic congestion.	26	The issues raised are dealt with in the parts of this table relating to MM17, MM18 and MM88
MM87	Policy HO3	1. CEG support all the modifications to Policy HO3.	104	The support is noted and welcomed.
		2. The Yorkshire Greenspace Alliance raise concerns about the amendments to the housing distribution. Whilst in terms of the percentage of allocation, the development emphasis remains focused on the inner urban areas of the District, it is deeply worrying that the proposed response to a changed settlement hierarchy is to draw 1,100 dwellings away from inner areas, especially Bradford City, and towards Wharfedale and Airedale. This is decentralising.	114	The Council strongly disagrees with the both the comments of the objector. As the Alliance well know the overwhelming emphasis of the plan remains focused on development within the main urban areas of the district – in no way could the plan’s strategy either as contained within the CSPD be described as decentralising. Even after the modest changes of the main modifications are applied the plan is seeking to direct 66% of the housing requirement to the Regional City and

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		It is not sustainable in infrastructure terms, adding pressure to heavily congested arterial roads that blight communities with air and noise pollution and physical separation;		<p>82% to the 4 settlements within the top tiers (the Regional City and the Principal Towns of Keighley, Ilkley, and Bingley)</p> <p>Furthermore any proposed housing distribution has to be based on a range of evidence and the need to protect key areas of environmental significance. The reductions within the Regional City are justified, sound and evidenced. No attempt is made by the objector to address the issues which led to the reductions within the Regional City.</p> <p>The Council disagrees. Infrastructure issues and rush hour related congestion are not unique to Airedale and Wharfedale. Indeed infrastructure pressures ranging from the need for new schools and health facilities to existing congestion, and existing air quality issues are far more severe within the urban areas which the objector presumably considers should take even higher shares of new development.</p>
		3. The modifications reduces the Plan’s focus on regenerating urban areas	114	The proposed modifications to the housing distribution make no difference to the regeneration emphasis of the plan and it is unclear how or why this would be the case.
Representations Regarding the Change to the Bradford NE Target				
		4. A number of objections are made stating that the numbers for Bradford NE should not have reduced so as to accommodate a reduction of 1800-2000 in the Bradford SE target.	22, 31, 45, 53, 59, 74, 90, 112, 117	<p>Firstly the Council considers that the housing apportionment for the Bradford SE area which would include an urban extension is a sound, justified and sustainable approach and there was therefore no justification to propose a modification to the Bradford SE housing target.</p> <p>The Council disagrees that the Bradford NE target should not have been reduced and other</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM87 (Cont.)				<p>than a desire to see the Bradford SE number reduce the objectors have provided no arguments to justify their suggestion. The Council has set out its reasons for the reduction to the Bradford NE apportionment in document PS/G004a which relate to a reduction in the potential land supply in that area based on data within the third SHLAA which was published in July 2015 (document PS/G004i).</p>
		<p>5. Bradford, Canal Rd Corridor, Shipley and Airedale are predominant areas for economic growth and employment opportunities, yet housing targets in these central urban areas are to decrease and outer rural areas increase. The modifications should be vice versa.</p>	26	<p>Firstly the Council considers that the housing apportionment for the Wharfedale as modified is a sound, justified and sustainable approach which reflects key evidence base updates including the revised HRA.</p> <p>The Council disagrees with the implication that the targets in areas such as Bradford NE should not have been reduced and instead should have been increased. No evidence or argument is provided by the objector to explain how this would be a sound approach given the updated evidence base.</p> <p>The Council has set out its reasons for the reduction to the Bradford NE apportionment in document PS/G004a which relate to a reduction in the potential land supply in that area based on data within the third SHLAA which was published in July 2015 (document PS/G004i)</p>
		<p>6. The proposed reduction in housing numbers for Bradford NE is unsound and has not been justified.</p>	108	<p>The Council disagrees. The Council has set out clear reasons for the change and the proposed modification and the resulting requirement are justified and sound.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

Representations Regarding the Change to the Shipley & Canal Road Corridor Target				
MM87 (Cont.)		7. A number of objections are made stating that the numbers for Shipley & Canal Rd Corridor should not have reduced so as to accommodate a reduction of 1800-2000 in the Bradford SE target.	22, 31, 39, 45, 53, 59, 74, 90, 112, 117	<p>The Council disagrees that the Shipley & Canal Rd target should not have been reduced and other than a desire to see the Bradford SE number reduce the objectors have provided no arguments to justify their suggestion.</p> <p>The Council has set out its reasons for the reduction to the Shipley & Canal Rd apportionment in document PS/G004a which relate to a reduction in the potential land supply in that area based on data within the third SHLAA (document PS/G004i) and the detailed work underpinning the Shipley & Canal Rd Corridor AAP which is due to be submitted to PINs after Easter.</p>
		8. Bradford, Canal Rd Corridor, Shipley and Airedale are predominant areas for economic growth and employment opportunities, yet housing targets in these central urban areas are to decrease and outer rural areas increase. The modifications should be vice versa.	26	<p>The Council disagrees with the implication that the targets in areas such as the Canal Rd Corridor should not have been reduced and instead should have been increased. No evidence or argument is provided by the objector to explain how this would be a sound approach given the updated evidence base.</p> <p>The Council has set out its reasons for the reduction to the Shipley & Canal Rd apportionment in document PS/G004a which relate to a reduction in the potential land supply in that area based on data within the third SHLAA (document PS/G004i) and the detailed work underpinning the Shipley & Canal Rd Corridor AAP which is due to be submitted to PINs after Easter.</p>
		9. The reduction in the figure for Shipley & Canal Road Corridor is not explained. There is capacity for the figure to actually be increased.	39	The Council disagrees. The Council has set out clear reasons for the change and the proposed modification and the resulting requirement are justified and sound.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

Representations Regarding the Change to the Shipley Target				
MM87 (Cont.)		10. The proposed modification is sound. Historic England state that the suggested change in the housing requirements for Shipley now provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire.	9	Support noted.
		11. The numbers for Shipley should not have reduced so as to accommodate a reduction of 1800-2000 in the Bradford SE target.	22, 31, 39, 45, 53, 59, 74, 79, 90, 112, 117	<p>The Council disagrees that the Shipley target should not have been reduced and other than a desire to see the Bradford SE number reduce the objectors have provided no arguments to justify their suggestion.</p> <p>The Council has set out its reasons for the reduction to the Shipley apportionment in document PS/G004a which relate to a reduction in the potential land supply in that area based on data within the third SHLAA which was published in July 2015 (document PS/G004i) and the representations made by English Heritage seeking a reduced housing quantum which would provide greater confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire</p>
		12. Bradford, Canal Rd Corridor, Shipley and Airedale are predominant areas for economic growth and employment opportunities, yet housing targets in these central urban areas are to decrease and outer rural areas increase. The modifications should be vice versa.	26	The Council disagrees with the implication that the targets in areas such as Shipley should not have been reduced and instead should have been increased. No evidence or argument is provided by the objector to explain how this would be a sound approach given the updated evidence base and the representations made by English Heritage to the Shipley target to the CSPD seeking a reduction.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		Objections to Regional City of Bradford targets where no modifications have been proposed.		
MM87 (Cont.)		13. A significant number of representations have been made relating to the housing targets for areas where no modification has been proposed. In many instance the arguments repeat those made in objections to the CSPD. These representations are set out below:		
		Representations Made Regarding the Bradford City Centre Housing Target		
		14. With the opening of the Westfield Shopping Centre there is plenty of scope to increase the target and in so doing reduce that of Bradford SE.	39, 102	The Council disagrees. The Council have set what they consider to be a challenging but realistic housing target for the City and in doing so have already factored in an assumption of a continuing economic recovery and regeneration within the City Centre. Such a recovery will be necessary if the existing target of 3,500 is to be achieved. The opening of the Westfield shopping Centre is welcomed but is not a new issue – the centre was under construction at the time of the Examination hearings.
		Representations Made Regarding the Bradford SE Housing Target		
		15. Support BD1 and HO3, support housing target of 6000 for Bradford SE	37	Noted.
		16. There is no sign of the housing numbers for Bradford SE being revisited despite the widespread public objection and the cogent reasons that were presented at the Saltaire hearings to restrict development to a maximum of 900 dwellings in and around Holme Wood.	101	The Council have considered the points made by those objecting to the Bradford SE housing apportionment and those objecting to the Holme Wood Urban extension at each point of public engagement. The modifications proposed reflect those limited instances where there are justifications to make modest adjustments to the Core Strategy housing distribution. There were no such justifications to reduce the Bradford SE apportionment and the Council considers that there were no remotely cogent or substantiated reasons presented during the hearings to justify the change proposed by this objector.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM87 (Cont.)		17. The number of 6000 houses shown for SE Bradford should be reduced by 1800-2000 / at least 2000 and that the reduced numbers in other parts of the City of Bradford which have reduced should not be reduced so extensively and/or that the numbers outside the City of Bradford which have been increased should be increased further to accommodate the reduction in SE Bradford.	22, 31, 39, 45, 53, 59, 72, 74, 85, 90, 112, 117	The Council disagrees. There are no grounds for such a reduction in the Bradford SE target and the Council has explained within document PS/G004a why it has proposed changes in other parts of the district.
		18. An unfair and disproportionately high number of houses are being distributed to SE Bradford, and in particularly the Tong Valley, which is not sustainable in community terms	22, 28, 29, 31, 39, 45, 53, 59, 72, 74, 82, 84, 87, 90, 93, 98, 101, 102, 105, 117	The Council notes that this in an argument which was made in representations to the CSPD and at the initial EIP hearings. The Council’s response is set out within document SD/009 at page 88 of Appendix 7J. It is repeated below: “The Council does not consider that he proposed target of 6,000 is disproportionately high. The target does lie above the baseline population proportionate target however this reflects the circumstances of both this sub area as one of the most sustainable locations for growth and reflects the circumstances within the other Bradford sub areas where land supply is more constrained. The proposal therefore reflects the evidence base and is both justified and effective.”
		19. There revised figures mean that the homes proposed for Bradford SE form 14% of those in the plan compared to 10% previously.	93	This in incorrect. The proposed 6000 homes has not been changed as a result of the modifications – it represents approximately 14% before the modifications and the same after the modifications are applied.
		20. The distribution is unsound – there have been reductions in some parts of the Regional City but no reduction in Bradford SE – this represents an unjustified and unsustainable shift of housing pattern.	39, 84	The distribution is in the Council’s view sound and the modifications which have been proposed are justified. The plan retains a strong focus on development within the Regional City with 65.9% of the district wide apportionment.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM87 (Cont.)		<p>21. The proposed distribution shown in the revised numbers included in the Main Modifications makes significant reductions in the Regional City of Bradford in areas which do not require significant Green Belt adjustment and does not make any reduction in the Bradford SE numbers which are almost wholly sensitive to Green Belt release.</p>	39	<p>This is incorrect and irrelevant.</p> <p>The only area where green belt contributions are not required and where a reduction is proposed is the Shipley Canal Rd Corridor which is contained within the urban area and does not therefore have a boundary contiguous with the green belt. Here the change is just 100 dwellings to reflect reduced land capacity.</p> <p>The other areas of the Regional City which have seen proposed reductions in their housing targets – Bradford NE and Shipley - will need significant green belt contributions in order to meet their targets – that was the case before the modifications and will still be the case under the revised distribution.</p>
		<p>22. The Council’s previous assertion at a 2009 consultation event that 2000 houses were needed in green belt land in Tong Valley due to the absence of suitable sites within Airedale and Wharfedale. The sites are now available as key constraints have been removed.</p>	39	<p>The point is incorrect. There is no such simplistic link nor has it been argued that the need for an urban extension and green belt release at Holme Wood is linked solely to the land supply situation in Airedale and Wharfedale. Indeed the Council would strongly disagree with the implication made by the objector that it would be an appropriate or sustainable option to transfer an additional 2000 new homes from a sustainable location close to the City and close to where the need for new homes and the need for regeneration are greatest to Wharfedale and Airedale.</p>
		<p>23. The employment and jobs available does not justify the quantity of homes proposed.</p>	82	<p>It is not known how the objector has arrived at this conclusions and what if any analysis or data underpins it. The Council disagrees with the general point and would point out the areas close proximity to and accessibility to large areas of employment both on the south side of the city and within the city centre.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM87 (Cont.)		<p>24. The proposed development will not be adequately supported by the infrastructure envisaged.</p>	<p>22, 28, 29, 31, 53, 59, 74, 82, 84, 87, 93</p>	<p>The Council considers that no new issues have been raised in the representations. The Council has addressed these concerns within its response to the representations to the CSPD (document SD/009).</p> <p>The Council understands that there will be concerns over whether there will be sufficient services and in particular schools capacity as a result of the planned development and also understands that there will be concerns about peak time commuter based congestion.</p> <p>However these issues are not unique to single areas such as Bradford SE and will be an issue more or less wherever the new homes are allocated.</p> <p>The district's population is growing and will continue to do so and therefore infrastructure and services will need investment and improvement across the district. The Council has produced an Local Infrastructure Plan to address these issues. It has consulted with utility providers as part of that work. The Local Infrastructure Plan indicates a number of challenges in accommodating future growth but does not indicate any major infrastructure issues which are not capable of resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.</p>
		<p>25. There needs to be evidence of the thorough investigation of all available alternative brown field sites as Bradford is full of such areas, open spaces, derelict and abandoned buildings that can easily be rezoned / redeveloped for housing purposes.</p>	<p>28, 29</p>	<p>The Council has examined in detail the potential deliverable and developable land supply within the district including the contribution which could be made from brown filed sites.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

Representations Made Regarding the Bradford SE Housing Target with Specific Reference to the Proposed Urban Extension and the Tong Valley				
MM87 (Cont.)		26. The overall housing requirement has now been reduced significantly over the years. At the time that 6000 houses were planned for South East Bradford (including the Tong Valley), the required number of new homes for the district has dropped from 45900 to 42000 yet there has been no reduction in the numbers said to be needed in the Tong Valley.	66	The housing distribution as proposed within the CSFED was reviewed and amended when the Publication Draft was produced based on a range of updated evidence and criteria. It would have been entirely wrong to simply reduce each settlement proportionally according to the slightly lower district wide housing requirement. Account also has to be taken of updated evidence such as the SHLAA, the SHMA, the HRA, the Bradford Growth Assessment etc. Moreover the case for a substantial sustainable urban extension at Holme Wood had not changed. Finally the objector’s figure for the district housing requirement at CSFED is wrong – it was 45,500 not 45,900.
		27. Failure to have discussions with Leeds under the duty to co-operate	66	The Council disagree and refer to the document SD/006 which sets out the extensive work and actions undertaken under the ‘duty to co-operate’. The Council also point out that it will continue to work with and co-operate with Leeds City Council as part of the preparation of the Allocations DPD.
		28. A series of objections have been made which express concern at the loss or green belt. The majority of the issues raised repeat the points made at the Publication Draft stage.	19, 28, 29, 31, 32, 43, 45, 48, 50, 53, 59, 61, 66, 72, 79, 82, 84, 85, 87, 93, 98, 105, 112, 116, 117	The Council considers that it has addressed both the need and justification for the green belt releases and the merits of the urban extension at Holme Wood within the plan itself (Policies SC4 and HO2), within its response to the objections to the CSPD (document SD/009 - pages 4-54 of Appendix 7J) and within modification MM17 & MM18.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		29. The green belt land at Tong Valley is necessary to prevent Leeds and Bradford joining as one urban sprawl.	90, 117	The extent of the strategic gap between Bradford and Leeds and the limited scale of land required means that there is no danger or issue of coalescence between the two cities. The Bradford Growth Assessment supports the view that the urban extension can be achieved without undermining the strategic role and the functioning of the green belt between Leeds and Bradford. Moreover the Assessment suggests that green belt releases in the Bradford SE area would be amongst the most sustainable options and would support regeneration.
		30. Bradford Growth Assessment did not provide adequate independent evidence supporting release of land at Tong.	98 28, 29, 31, 45, 50, 53, 59, 61, 66, 72, 74, 84, 87, 93, 93, 98, 101, 112, 117	Bradford Growth Assessment (EB/037) provides appropriate and robust evidence in support of the Core Strategy. It was undertaken by independent consultants working to the Councils Brief. It follows good practice and constitutes a professional and sound piece of work. The role of the Bradford Growth Assessment was not to assess the need for green belt land releases but to provide evidence and analysis of the extent of potential sustainable green belt land releases across the district should they be needed.
		31. The SHLAA shows haphazard boundaries defined by land ownership (SE99/100/101) which is totally at odds with the requirement for green belt to have well defined boundaries to avoid further creep or infill.	66	The boundaries for housing allocations and any revisions to the green belt boundary will be set within the Allocations DPD and will not necessarily follow in every case the boundaries as set out in the current SHLAA. The Allocations DPD will involve further site assessments and a detailed green belt review

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				and if necessary alternative green belt boundaries may be put forward.
MM87 (Cont.)		32. There are several other areas in Bradford which are not in green belt whose numbers have been reduced and where clearly planning permission had been anticipated, numbers in these areas should be put back up.	79	It is unclear how the objector has arrived at this conclusion. Within the Regional City of Bradford the two areas which are proposed for a significant reduction – Bradford NE and Shipley – will both require significant green belt deletions to secure even their lower targets. They will both require major new land release both within and adjoining the existing built up areas and could not achieve their targets based on sites currently with planning permission. The Canal Rd Corridor has seen a minor reduction due to land supply constraints.
		33. Loss of beautiful countryside and flora and fauna	19, 28, 29, 32, 48, 53, 72, 93	The precise nature of the urban extension will be determined within the Allocations DPD which will assess any required mitigation measures which will minimise impacts on local flora and fauna.
		34. There are plenty of brownfield sites. Has sufficient consideration been given to the possible use of brown field sites?	48, 61, 87	Yes, consideration has been given to the use of brown field sites. The Council’s SHLAA has assessed the supply of deliverable and developable brown field sites. The district’s needs cannot be met without a sizeable contribution from green field sites and without a significant release of green belt land.
		35. Contrary to the Council’s own Tong valley landscape Character SPD	66	The Council disagrees. The Landscape Character SPD (PS/E021) is part of a range of evidence which has been considered as part of the preparation of the Core Strategy and will inform detailed site allocation choices as part of the more detailed local plan documents. Volume 7 relates to the

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM87 (Cont.)				<p>Tong Valley (PS/E021i) The conclusions at paragraph 6.3.3 sets out some high level conclusions. These recognise the nature of the landscape and its sensitive nature. It does recognise that if development has to be located within the area land adjoining West Gate Hill Street and Holme Wood would be most appropriate. The extent and location of the urban extension will be for the Allocation DPD to determine. This will include consideration of impact on landscape and any mitigation required to support growth in this location and actions to reinforce character as part of any urban extension in terms any new edge to the main urban area and interface with Tong Valley.</p> <p>There is therefore no evidence to suggest that the area cannot accommodate the proposed development without damage to the area, if designed sensitively and if incorporating mitigation measures and appropriate landscape design, planting and boundary treatments.</p>
		<p>36. Baildon and Haworth have seen reductions in response to representations from English Heritage relating to the impact of development on conservation areas. So why has the Council not considered the impact of the proposals for the urban extension in SE Bradford on the twin conservation villages of Tong, in Bradford, and Fulneck, in Leeds, both of which will be as adversely affected by far greater housing numbers within their common landscape setting.</p>	39	<p>The Council has considered such issues but does not consider that there will be such an adverse impact. The reductions relating to Baildon and Haworth were made in response to specific concerns raised by English Heritage (now Historic England). English Heritage have not raised concerns about the impact on Tong or Fulneck conservation areas.</p>
		<p>37. A number of respondents raise concerns about the flood risk as a result of the proposed urban extension and a number of references are made to both historic and more</p>	19, 28, 32, 39, 43, 48, 66, 79, 84,	<p>The Council acknowledges that the assessment of flood risk and the production of a strategy which distributes development in a</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM87 (Cont.)		recent flood events in the Tong Valley (beyond the urban extension)	87, 93, 102, 105, 112	<p>way which minimizes the use of areas at risk of flooding is an important and significant issue. It also acknowledges that December 2015 saw a significant flood event which had severe impacts on a number of areas within the district.</p> <p>However the potential for severe flood events is not a new issue which was not apparent or considered as part of the development of the Core Strategy Publication Draft.</p> <p>The Council's approach to flood risk, both in terms of its policies and in terms of the evidence underpinning those policies is considered to sound, robust and in accordance with Government policy within the NPPF. The Council notes that since the initial examination hearings there have been no changes in the NPPF relating to flood risk and there have been no objections raised to the original or the revised housing distribution by the statutory agency the Environment Agency. To be clear the Environment Agency have raised no objections to the proposed housing target or urban extension in Bradford SE. All of the potential land within the SHLAA 3 trajectory which may be released as part of the urban extension lies within flood zone 1.</p> <p>The Council has gathered evidence in the form of a Strategic Flood Risk Assessment, worked constructively and co-operatively with the Environment Agency and has adopted a sequential approach to the distribution of the district wide housing requirement. In doing so it has demonstrated that the vast majority of development in the district will be accommodated on areas within flood risk zone</p>
--------------	--	---	-----------------------	--

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				<p>1, the area with the lowest risk of flooding from fluvial sources. It is able to guarantee this because the SHLAA has identified sufficient sites in flood zone 1 and had discounted as unsuitable sites which fall within flood zone 3b (this is the functional flood plain).</p> <p>The Council has revised and updated the flood risk sequential background paper using the proposed slightly modified housing distribution and updated land supply data in SHLAA 3. The results actually show an improvement in that the need for flood zone 2 and 3a land which was already only a tiny proportion of the overall housing requirement has actually reduced. This is largely due to the increased capacity of sites within the Bradford City centre Area.</p> <p>The Council have also included within the Core Strategy a specific policy, EN7, which embeds the sequential approach within the whole of the Local Plan making process and will ensure that the site selection process within the Allocations DPD focuses on sites which minimise flood risk, and includes proposals to manage and mitigate the impacts of new development taking account of all sources of flooding including ground water flooding.</p>
		<p>38. We believe that the Local Plan should include by way of a Main Modification a confirmation that studies will be undertaken on the flooding effects of every housing development proposal and the extent of defensive or preventative civil engineering work that would be required within the landscape surrounding such proposal, particularly where such engineering would be required with Green Belt land.</p>	39	<p>No such modification is needed or justified. All site proposals within the allocations DPD will be subject as necessary and appropriate to flood risk and drainage appraisals and the plan as a whole will be supported by evidence including an update to the SFRA and continuing discussions with the relevant statutory bodies such as the Environment Agency.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				If specific sites require mitigation measures the Allocations DPD can include proposals to ensure that they take place.
MM87 (Cont.)		<p>39. A number of comments have been received objecting to the proposed housing target due to the alleged impacts on infrastructure such as roads, congestion, schools, doctors etc.</p>	19, 28, 29, 31, 32, 45, 59, 66, 84, 116	<p>The Council considers that no new issues have been raised in the representations. The Council has addressed these concerns within its response to the representations to the CSPD (document SD/009).</p> <p>The Council understands that there will be concerns over whether there will be sufficient services and in particular schools capacity as a result of the planned development and also understands that there will be concerns about peak time commuter based congestion.</p> <p>However these issues are not unique to single areas such as Bradford SE and will be an issue more or less wherever the new homes are allocated.</p> <p>It may be the case that planning an urban extension such as at Holme Wood may provide better opportunities to provide and plan for new infrastructure needs than in areas where development and growth is more dispersed. The Allocations DPD will include policies and land allocations to provide for necessary supporting infrastructure.</p> <p>The district's population is growing and will continue to do so and therefore infrastructure and services will need investment and improvement across the district. The Council has produced an Local Infrastructure Plan to address these issues. It has consulted with</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				utility providers as part of that work. The Local Infrastructure Plan indicates a number of challenges in accommodating future growth but does not indicate any major infrastructure issues which are not capable of resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.	
MM88	Policy HO3	1.	CEG support all the modifications to Policy HO3	104	Support noted.
Representations Made Regarding Housing Proposed Within Wharfedale					
		2.	Supports the proposed increase of the Wharfedale apportionment from 1,600 to 2,500.	39, 40, 41, 47, 58	Support noted.
		3.	The targets for the Wharfedale settlements which have seen increases in the modifications i.e. Ilkley, Burley, Menston, should be even higher - to accommodate the reduction in SE Bradford.	22, 31, 39, 45, 53, 59, 74, 85, 90, 117	The Council considers the scale of increases proposed within Wharfedale are appropriate and reflect the updated evidence and the revised HRA while still maintaining the overall focus of the plan which is to place the highest proportion of new development within the Regional City in turn reflecting the location of greatest current and future need.
		4.	General concerns that the development proposed in Wharfedale will not be sustainable and would therefore conflict with Core Strategy Objective 2.	54, 63, 69	The Council considers that the proposals are entirely sustainable and reflect the settlement hierarchy which in turn reflects the scale and nature of settlements and their accessibility to employment and services. Ilkley, Burley and Menston are all sustainable locations for growth.
		5.	The housing levels proposed for Wharfedale are out of proportion with proposals for the rest of the District	60	In what way? The Council points out that even under the modified housing distribution the apportionment to Wharfedale represents only 2,500 or 5.9% of the district wide housing requirement of 4,100. This compares to an apportionment of 27850 or 65.9% to the Regional City of Bradford.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		6. There is insufficient demand in Wharfedale for the housing increases proposed.	60	The Council disagrees. No evidence is provided to substantiate this objection.
		7. A number of comments have been received which concerning the impacts of the proposed levels of development on the N & S Pennines SPA / SAC, and suggesting deficiencies / an inadequate HRA	54	Detailed responses relating to the revised HRA are elsewhere however the Council can confirm that the revised HRA has fully assessed the proposed increases in housing in Wharfedale and concluded that they are highly likely to be capable of being accommodated without adverse impact on the integrity of the SPA or the SAC. The conclusion is taken on the basis that the Allocations DPD will be able to assess the site options and site impacts in more detail and will be able to propose where necessary appropriate management and mitigation measures. Furthermore it should be noted that the Council has worked closely with Natural England in revising both the HRA and the policies and supporting text and Natural England have no objections to the proposed amended housing distribution.
		8. A number of comments and concerns have been raised about the loss of green belt. These are set out below. Green belt loss not justified	63, 64, 69, 99, 115	Firstly the Council considers that the comments raise no new issues and point out that the implications of the need for green belt releases have been assessed and in the Council’s view could be achieved in a sustainable manner. The Council has set out the exceptional circumstances which exist and which require the release of green belt land. It has also assessed alternative distributions of the housing requirement at the different stages of plan preparation. Green belt change will be necessary in most settlements within the

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		<p>The green belt around Ilkley and Burley is a critical part of the character of the area and any reduction will diminish that character and be a loss to the area.</p> <p>The main modifications seem to have put more burden on the Wharfe Valley finding more homes despite the fact this mean more greenbelt being used to fulfil the numbers set out.</p>	<p>60, 64, 115</p> <p>115</p>	<p>district. Green belt change can be achieved in Wharfedale in sustainable locations and in ways which would not undermine the strategic functioning of the green belt.</p> <p>The Council will seek within the Allocations DPD to allocate sites and include proposals for sensitive design which will minimise impacts on local character and landscape. Landscape character is not a component of the reasons for green belt designation in Wharfedale.</p> <p>The modifications make no substantive change to the amount of green belt within the district that is likely to be needed to accommodate the district wide housing requirement since all the settlement areas (bar the Shipley & Canal Rd Corridor) are areas which will themselves need to see green belt release to meet their housing targets.</p>
		<p>9. The proposals do not address the resulting “merger” of Menston, Burley and Ilkley resulting from the plan.</p>	<p>23, 69</p>	<p>The level of development proposed would not remotely need, require or lead to a merger of these settlements.</p>
		<p>10. General damage to the environment, impact on natural animal habitats</p>	<p>69</p>	<p>The Allocations DPD will assess the site options and seek to avoid the loss or impact on designated wildlife areas and incorporate as appropriate mitigation measures. The Allocations process will also follow the principles set out in Core Strategy policy HO7 criteria F2 and G3 of which relate to protecting or enhancing biodiversity and natural habitats.</p>
		<p>11. No assessment has been made of the alternative of concentrating on development on the brownfield sites where the majority of issues do not apply</p> <p>There are plenty of brownfield sites and semi derelict mills</p>	<p>23,</p> <p>99, 115</p>	<p>The Council has assessed the availability of brown field sites within its SHLAA and has taken into account the principle of maximising its use when deriving the housing distribution (see paragraph 5.3.57 of the CSPD). The</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		in Bradford – why are these not being used.		distribution incorporates an assumption that all of the identified deliverable or developable supply of brown field land within the district will be utilised.
MM88 (Cont.)		<p>12. A number of comments are received relating to an alleged lack of infrastructure including schools, Ilkley Grammar School capacity, lack of car parking capacity particularly at rail stations.</p>	6, 23, 26, 27, 54, 55, 60, 64, 79, 103, 115	<p>The Council considers that no new issues have been raised in the representations. The Council has addressed these concerns within its response to the representations to the CSPD (document SD/009).</p> <p>The Council understands that there will be concerns over whether there will be sufficient services and in particular schools capacity as a result of the planned development and also understands that there will be concerns about peak time commuter based congestion.</p> <p>However these issues are not unique to single areas such as Wharfedale and will be an issue more or less wherever the new homes are allocated.</p> <p>The district's population is growing and will continue to do so and therefore infrastructure and services will need investment and improvement across the district. The Council has produced an Local Infrastructure Plan to address these issues. It has consulted with utility providers as part of that work. The Local Infrastructure Plan indicates a number of challenges in accommodating future growth but does not indicate any major infrastructure issues which are not capable of resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		<p>13. Flooding</p> <p>Events during the winter of 2015-16 have clearly shown that several sites in Ilkley and elsewhere in Wharfedale identified in the SHLAA are unsuitable for development due to groundwater flooding and inadequate infrastructure</p>	54, 99	<p>The Council acknowledges that the assessment of flood risk and the production of a strategy which distributes development in a way which minimizes the use of areas at risk of flooding is an important and significant issue. It also acknowledges that December 2015 saw a significant flood event which had severe impacts on a number of areas within the district.</p> <p>However the potential for severe flood events is not a new issue which was not apparent or considered as part of the development of the Core Strategy Publication Draft.</p> <p>The Council’s approach to flood risk, both in terms of its policies and in terms of the evidence underpinning those policies is considered to sound, robust and in accordance with Government policy within the NPPF. The Council notes that since the initial examination hearings there have been no changes in the NPPF relating to flood risk and there have been no objections raised to the original or the revised housing distribution by the statutory agency the Environment Agency. To be clear the Environment Agency have raised no objections to the proposed housing targets in Wharfedale.</p> <p>The Council has gathered evidence in the form of a Strategic Flood Risk Assessment, worked constructively and co-operatively with the Environment Agency and has adopted a sequential approach to the distribution of the district wide housing requirement. In doing so it has demonstrated that the vast majority of development in the district will be accommodated on areas within flood risk zone</p>
--------------	--	--	--------	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

			<p>1, the area with the lowest risk of flooding from fluvial sources. It is able to guarantee this because the SHLAA has identified sufficient sites in flood zone 1 and had discounted as unsuitable sites which fall within flood zone 3b (this is the functional flood plain).</p> <p>To be clear sites within the functional floodplain within Wharfedale do not appear in the SHLAA trajectory and have not been relied upon in the housing apportionment. SHLAA 3 data indicates a total deliverable and developable land supply in Wharfedale of over 5,392.5 units of which 4,759.5 (88%) lie in flood zone 1 174 in flood zone 2 and 459 in flood zone 3a). As a result the Council can show that no land in the higher risk fluvial flood risk zones 2 or 3a will be required in order to meet the proposed housing targets</p> <p>The Council has revised and updated the flood risk sequential background paper using the proposed slightly modified housing distribution and updated land supply data in SHLAA 3. The results actually show an improvement in that the need for flood zone 2 and 3a land which was already only a tiny proportion of the overall housing requirement has actually reduced. This is largely due to the increased capacity of sites within the Bradford City centre Area.</p> <p>The Council have also included within the Core Strategy a specific policy, EN7, which embeds the sequential approach within the whole of the Local Plan making process and will ensure that the site selection process within the Allocations DPD focuses on sites which minimise flood risk, and includes proposals to manage and mitigate the impacts of new development</p>
--	--	--	--

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				taking account of all sources of flooding including ground water flooding.
		Representations Made Regarding the Ilkley Housing Target		
MM88 (Cont.)		14. Support the increase of the Ilkley target to 1,000	34	Support noted.
		15. The proposal is sound and meets the 4 tests of soundness.	40, 41, 47	Support noted.
		16. We object to the limited increase proposed for the housing requirement distributed to Ilkley. The target should be 1,250 units. The HRA should not be the sole reason for the Ilkley adjustment. The Principal Town status, with its many strengths and the policy support referred to above are also a reason for increasing the housing requirement	113	The Council have based its proposed modifications on those changes necessary to reflect the updated evidence base and the revised HRA. The status and nature of Ilkley and its Principal Town status have not changed. The modification proposes an increase of 25% which the Council considers appropriate. The objector does not provide any justification for a figure of 1,250.
		17. The 1,250 units should be expressed as a minimum with a need to add an appropriate percentage for reserved land which is removed from the Green Belt to ensure that the Green Belt boundaries when amended are then capable of enduring unchanged for at least 20 years from plan adoption.	113	The Council disagrees. There is no need or justification for individual settlement targets to be expressed as a minimum. To do so would reduce the clarity of the plan and introduce uncertainty would also potentially extend the time required to produce the Allocations DPD.
		18. Ilkley is not a sustainable location for development.	26	The Council disagrees. Ilkley is a Principal Town and is a sustainable location for the proposed level of growth.
		19. The area lacks jobs – Ilkley is a dormitory town providing housing for people who work in Leeds and Bradford.	68, 89	Ilkley is a large town with significant employment opportunities in its own right but equally its highly sustainable location with easy access to Leeds and Bradford by both road and rail makes it a very sustainable location for new development.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		20. The Sustainability appraisal does not appear to have taken into account Social, Environmental and Economic factors.	106	The sustainability appraisal has assessed the three aspects of sustainability.
		21. The houses are not needed as any population rise is entirely due to immigration therefore the Council should resist any Government edict to expand.	89	The comments are not relevant. The Council are required to assess objectively the district’s needs for new homes and this must be informed by likely future patterns of migration.
		22. NPPF & NPPG suggests that targets should be based on local assessments of need	26	<p>This is not correct. There is no requirement in either the NPPF or the NPPG to carry out objective assessments of need at a local level or on a settlement by settlements basis.</p> <p>The Council have compiled its evidence and informed its policy choices correctly and in line with Government Guidance by carrying out a robust district level objective assessment of need while also informing its housing distribution by a range of evidence and criteria as set out within pages 163-171 the Core Strategy. Its policies have also been informed by a more detailed assessment of housing needs within the SHMA which takes account of geographical differences and market indicators.</p>
		23. Although the HRA has changed the issue of impact has not and is still a constraint to development;	35, 55, 80	The Council has produced an amended HRA and based on that work there are no reasons relating to the potential direct or indirect impacts of development on the SPA / SAC why the higher housing target as proposed cannot be accommodated. This is underlined by the absence of any objection to the revised and updated targets by Natural England.
		24. The HRA has not properly assessed the impacts of development and in particular has not considered the impact of increased population which development will	26	The HRA has assessed both direct and indirect impacts and all relevant impact pathways and is considered robust. This includes the impacts

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		bring.		of an increased population. The HRA has been modified and updated in conjunction with Natural England. No objections have been made by Natural England to the modified housing distribution.
MM88 (Cont.)		<p>25. The main modifications increase in Wharfedale targets has been largely balanced out by comparable reductions in those for the Regional City, yet</p> <ul style="list-style-type: none"> • We are unaware of any concerns being expressed about the impacts of the (then higher) Regional City Publication Draft housing targets, and • SHLAA3 now indicates the Regional City group has an additional capacity of around 1,000 	35, 55, 80	<p>The Council has set out the reasons and circumstances which warrant and require a downward adjustment in the targets for 3 of the sub areas within the Regional City. It is also incorrect to state that no concerns have been realised over the Regional City targets. For example and most pertinently Historic England had raised concerns over the targets for the Shipley area.</p> <p>In summary</p> <ul style="list-style-type: none"> • the target for the Canal Road corridor needed a slight adjustment downwards as a result of updated and tighter land supply data itself reflecting the more advanced nature of the work on the AAP • the target for Bradford NE needed a slight adjustment downwards due to updated land supply data; • the target for Shipley needed a significant revision downwards because of updated data on land supply and concerns over the impact of development on the Saltaire World Heritage Site. Historic England have supported the changes to the Shipley target <p>The total and overall potential supply as set out within the third SHLAA has increased slightly by just under 1000 (it also increased slightly by 190 units in Wharfedale). However this in itself does not justify an increase in the Regional</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

			<p>City apportionment as a more detailed assessment both of the nature of the land supply data and of other factors and evidence is needed.</p> <p>It is worth re-iterating the point which the Council has made previously i.e. that where possible land supply figures should lie comfortably above the proposed targets so as to ensure that the most sustainable sites can be chosen and to allow for the loss of sites when more detailed assessment are carried out and also to allow for the fact there will be the need for land for other uses as well as housing.</p> <p>The increases in capacity in SHLAA 3 for the Regional City where focused on the City Centre, Bradford SW and Bradford NW, the latter of which were largely as a result of new speculative green belt submissions from land owners and developers.</p> <p>With regard to the City Centre there has been a significant increase in assumed capacity within SHLAA3 and thus largely reflects the more detailed technical work available with the AAP more advanced, level of regeneration in the city and thus a slightly more optimistic view. However the Council considers that the proposed target for the City centre at 3,500 is already challenging and ambitious and increasing it still further would not be appropriate.</p>
--	--	--	--

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		<p>26. Bradford City Centre, Canal Road Corridor, Shipley and Airedale are predominant areas for economic growth and employment opportunities, yet housing targets in these central urban areas are to decrease.</p>	26	<p>The central areas comprising the Regional City of Bradford are indeed a focus for economic activity and jobs. They are also areas where housing need and regeneration is required. This is why these areas have a combined housing target of 27,750 (as modified) which is 27 times higher than that proposed for Ilkley. In combination the Regional City and the key settlements of Airedale (Bingley & Keighley) have been assigned a combined target of 33,650 which is 33 times higher than that for Ilkley.</p> <p>Under the modifications the Regional City as a whole is proposed to accommodate 27,750 dwellings or 65.9% of the district wide total, and Airedale 8,450 or 20.1%. Wharfedale meanwhile is proposed to accommodate 2,500 dwellings or 5.9%</p> <p>The housing target for Bradford City Centre has not as might be inferred by the representations been reduced. The figures for the Canal Road Corridor and for Bradford NE has been reduced because of land supply constraints revealed by the third SHLAA, as is the case in Bradford NE. Within Shipley a reduced land supply and concerns raised by English Heritage regarding the possible impacts of some potential sites on the setting of the Saltaire World heritage site have combined to require a significant reduction.</p>
		<p>27. To render the draft Plan sound in respect of the original figure of 2,897 then the reduced figure of 1600 must consequentially reduce to some degree at least pro rata the total housing distribution targets in the modifications now proposed.</p>	26	<p>No this is incorrect. The housing requirement study and its assessment of need was never based on annual jobs growth of 2,897 nor was the employment land requirement. The reduction of the quoted jobs growth figure</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				simply brings this into line with what the housing requirement study assumed i.e. 1,604 / annum.
MM88 (Cont.)		28. There are not enough sites in the area at present	30	This is incorrect. The SHLAA indicates a potential deliverable or developable capacity for Ilkley of 1,842 units.
		29. A number of comments and concerns have been raised about the loss of green belt.. Goes against the instruction that inappropriate development should not be approved except in very special circumstances’;	3, 15, 25, 26, 33, 35, 55, 64, 68, 80, 89, 92, 106 25	Firstly the Council considers that the comments raise no new issues and point out that the implications of the need for green belt releases have been assessed and in the Council’s view could be achieved in a sustainable manner. The Council has set out the exceptional circumstances which exist and which require the release of green belt land. It has also assessed alternative distributions of the housing requirement at the different stages of plan preparation. Green belt change will be necessary in most settlements within the district. Green belt change can be achieved in Wharfedale in sustainable locations and in ways which would not undermine the strategic functioning of the green belt. The quoted test of very special circumstances does not apply to plan preparation it applies to the consideration of planning applications for uses which are considered inappropriate within the green belt.
		30. Compared with the local percentage of 80% the district wide 11,000 green belt requirement – equates to an average loss of 26% of each settlement’s green belt – a massive disparity as far as Ilkley and Wharfedale is concerned	35, 55, 80	The comments are misleading. To be clear the proposals and the land requirements represent just a tiny fraction of the total green belt area within the district. The proposed housing targets would not as implied by the objector

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)				<p>result in the loss of 80% of the green belt around Ilkley and would not result in the loss of 26% of the green belt in the district. The percentage figures being quoted are presumably instead the proportions of the respective housing targets (individual and district wide) which may require green belt land. The two are completely different measures.</p> <p>Moreover there is no reason why these percentages need be similar – the housing targets reflect and should reflect a range of criteria and evidence.</p>
		<p>31. A number of concerns are raised regarding potential impact on natural habitats, countryside, woodland, rights of way, heritage, character and landscape.</p>	<p>3, 15, 27, 35, 55, 73, 80</p>	<p>The Allocations DPD will assess the site options and seek to avoid the loss of designated wildlife areas, incorporate as appropriate mitigation measures and limit impacts on landscape. Retention of, new or diverted rights of ways can be incorporated within scheme design. The Allocations process will also follow the principles set out in Core Strategy policy HO7 criteria F2 and G3,G4 & G5 of which relate to protecting these features.</p>
		<p>32. Should use infill and brown field sites elsewhere</p> <p>there are many brownfield sites in the Bradford district which could be utilised</p> <p>Not compatible with the Government recommendation of brownfield first</p>	<p>3</p> <p>25, 27</p> <p>106</p>	<p>The Council has assessed the availability of brown field sites within its SHLAA and has taken into account the principle of maximising its use when deriving the housing distribution (see paragraph 5.3.57 of the CSPD). The distribution incorporates an assumption that all of the identified deliverable or developable supply of brown field land within the district will be utilised.</p> <p>While the Government attaches a high priority to seeing the delivery of new homes on</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				brownfield sites there is no such brownfield first policy within the NPPF.
MM88 (Cont.)		<p>33. A number of comments are received relating to an alleged lack of infrastructure including schools capacity, trains capacity, lack of car parking capacity particularly at rail station, traffic congestion on the A65.</p>	3, 4, 6, 15, 25, 26, 27, 30, 33, 35, 55, 64, 67, 68, 73, 80, 89, 92, 106	<p>The Council considers that no new issues have been raised in the representations. The Council has addressed these concerns within its response to the representations to the CSPD (document SD/009). The key points from that document are reproduced below.</p> <p>The Council understands that there will be concerns over whether there will be sufficient services and in particular schools capacity as a result of the planned development and also understands that there will be concerns about peak time commuter based congestion.</p> <p>However these issues are not unique to single areas such as Wharfedale and will be an issue more or less wherever the new homes are allocated.</p> <p>The district's population is growing and will continue to do so and therefore infrastructure and services will need investment and improvement across the district. The Council has produced an Local Infrastructure Plan to address these issues. It has consulted with utility providers as part of that work. The Local Infrastructure Plan indicates a number of challenges in accommodating future growth but does not indicate any major infrastructure issues which are not capable of resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.</p> <p>In the early stages of work on the Core Strategy the Council commissioned a</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				<p>Transport Study. Although looking at the district at a strategic level (housing quantum were based on wider sub areas rather than individual settlements), it did confirm that there was no option for distributing development across the district which performed significantly better others and that wherever housing growth was distributed there would be issues with regards to increased traffic flows and increased pressure on certain key areas, junctions and corridors.</p> <p>The study recommended that further more detailed corridor based studies were undertaken once there was more certainty over the proposed strategy for housing. Corridor based studies will therefore be produced as part of the work on the Allocations DPD and these will be focused on the areas of greatest concern. The studies will identify measures which will help manage, mitigate or reduce such capacity and congestion.</p> <p>As part of its statutory duties the Council’s Education Service will continue to plan for future educational service needs and the Council’s new statutory development plan, by providing more certainty over the levels of growth planned in each area, will actually assist it in both the planning process and its ability to bid for funding</p>
		<p>34. Apart from the HRA issues, other factors were said to have contributed to Ilkley’s downward adjustment to the target from the Further Engagement Draft to the Publication Draft stage (Background paper 2: housing Part1) these being</p> <ul style="list-style-type: none"> • That much of its capacity lies within green belt 	35, 55, 80	<p>Check later the background paper - This comments made misunderstand and misrepresent the analysis within the background paper. The analysis referred to was not an analysis of the need to change the housing numbers that were in the CSFED but an</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		<ul style="list-style-type: none"> • The need to protect Ilkley’s setting and landscape value • Oddly, flooding risk though was said to have only a neutral effect on Ilkley’s housing numbers, 		analysis of whether there were constraints or drivers to depart from the population proportionate housing target. It should be noted that the Council’s proposed modification still results in a target which lies below the population proportionate target. Furthermore the Council have not proposed a modification to re-instate in full the CSFED target of 1300.
		35. A number of respondents raise concerns about the flood risk as a result of the proposed development for Ilkley.	25, 27, 30, 33, 35, 42, 55, 73, 76, 80, 89, 92, 106	See response to point 13 above.
		<p>36. A number of comments are made making specific reference to recent flooding events and raise concerns about the indirect impacts of the proposed development which may increase flood risk elsewhere</p> <ul style="list-style-type: none"> • The Ben Rhydding site identified as a possible housing development site had a lake beside the sewage works. • The lower of the two pieces of land identified in the SHLAA Update Report (May 2013: Map IL/014) has been flooded over recent weeks and over many years. How is this compatible with the Plan’s statement that ‘the SHLAA has, in line with the definitions within the NPPF, ruled as unsuitable any site falling within flood zone 3b, the functional flood plain’ (5.3.4). 	<p>25</p> <p>33</p>	<p>It is not entirely clear which site the objector is referring to. The sewage works site is SHLAA site IL/031 2/3 of which lies within flood zone 3a. Sufficient flood zone 1 land / site means that this site may not need to be allocated.</p> <p>There is no incompatibility. The SHLAA records the site boundaries which have been submitted under previous call for sites. While the northern part of the site as submitted lies within flood zone 3b, the majority of the site lies within flood zone 1 meaning a suitable site boundary could be defined within the Allocations DPD which avoids built uses on the area subject to higher flood risk.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

Representations Made Regarding the Burley in Wharfedale Housing Target				
MM88 (Cont.)		37. Support the increase of the Burley target to 700. The proposal is sound and meets the 4 tests of soundness	40, 41, 47	Noted.
		38. The increased figure of 700 units for Burley is supported. It is fully justified and required in order for the Core Strategy to be considered sound. The reinstatement of Burley in Wharfedale as a Local Growth Centre is fully justified and the revised AA of November 2015 confirms that the higher target is highly likely to be delivered without any adverse impact on the integrity of the SPA or SAC alone or in combination with other plans or projects. The target is fully deliverable. The majority of the target could be met via a sustainable extension to the western side of the settlement in a way which would not prejudice the purpose and strategic function of the green belt. A westerly extension would in no way threaten coalescence with other settlements. The higher target will also help support the delivery of improved infrastructure to the village.	104	Noted.
		39. A number of objections have been raised to the re-classification of Burley In Wharfedale as a Local Growth Centre and its associated increase in housing target. The comments argue that the change is not justified or that the changes in the HRA on their own do not justify the change.	38, 46, 51, 54, 55, 70, 71, 75, 76, 77, 80, 95, 103	The principle of whether Burley In Wharfedale should be re-classified as a Local Growth Centre is dealt with under modification MM7 & MM8. Paragraphs 43.56 to 3.60 of the CSPD explain the role and derivation of the Settlement Hierarchy. They explain that the Local Growth Centres tier was created partly due to land supply constraints in the upper two tiers and partly due to the fact there are significant differences in the characteristic of the settlements below the Principal Towns level (some having better accessibility and /or better ranges of services and facilities) and their ability to grow in a sustainable way.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)				<p>Burley was identified in the CSFED as a Local Growth Centre, informed by the Council’s Settlement Study, in recognition of its location and accessibility to key transport links and its range of shops, services and community facilities..</p> <p>Its status was changed within the CSPD as a result of the HRA which indicated the need for restrictions of the amount of housing development in the areas within 2.5km of the S Pennines SPA & SAC. It was at that point no longer considered a settlement where significant growth could be accommodated so was placed in the bottom tier of the settlement hierarchy.</p> <p>However the subsequent revisions to the HRA have removed the need to take a highly precautionary approach in limiting development within the 2.5km zone and Burley has been re-classified as a Local growth Centre accordingly.</p>
		<p>40. Burley Parish Council opposes the concept that there is land available in Wharfedale sustainable locations which would not prejudice the strategic location of the green belt. The Parish Council is preparing a Neighbourhood Plan and this and the local community support the original 200 new homes for the village. An increase from 200 to 350 new homes would have been more acceptable.</p>	103	<p>The Council disagrees and would suggest that these comments are not supported by any convincing evidence or analysis. The Council is aware that the Parish is preparing a neighbourhood plan and is attempting to support the improvement of early drafts such that they are compliant with Government guidance, are coherent, sound, deliverable and justified.</p> <p>There is nothing in either the Parish’s Core Strategy submissions or the emerging Neighbourhood planning work to suggest that a 200 or 350 dwelling target is appropriate.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				There is also nothing to indicate that the modified 700 dwelling target could not be achieved in a sustainable way.
MM88 (Cont.)		41. Burley is not a sustainable location for 700 dwellings	70, 103	The Council disagrees.
		The proposed employment land allocation of 5ha in Wharfedale is still the same but the housing need brought about by the employment has increased	103	The housing apportionment in the CSPD was informed by a range of criteria but was not determined by a direct link between new employment land proposed and the jobs that that new employment land would create. It is not clear whether the objector is seeking a much higher level of employment land in addition to the new homes. Such an increased employment allocation would not in the Council's view be justified or appropriate.
		42. Will increase the need to travel because of the lack of employment in the local community. the only sizeable area of employment land within the village at present (Greenholme Mills) has just been re-planned as a primarily residential development.	70, 76	The Council considers the housing target appropriate as in addition to the range of jobs available locally it has excellent road and rail links to higher order centres. The proposals for the redevelopment of the Greenholme Mills site will have little bearing on the total supply of jobs locally. The planning statement accompanying the application states that current employment on the site amounts to 23 full time and 5 part time posts with the redevelopment proposing uses such as a crèche, spa / gymnasium and restaurant providing 56 jobs (not specified as whether ft or pt).
		43. The increase is excessive and the expansion proposed will create a settlement the size of a small town with the facilities and transport links of a village.	38, 46, 56, 76	The target is not considered excessive. The target of 700 dwellings is the joint lowest of those designated a Local Growth Centre with Silsden set to accommodate 1,200 dwellings.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				While Burley’s target lies above the population proportionate share which would produce a target of 518 dwellings the larger apportionment actually offers opportunities for Burley to secure significant improvements in services such as the provision of a new primary school.
MM88 (Cont.)		44. In making the modification to increase the housing number no modifications have been included to ensure that provisions is made to cope with additional service pressures and no planning is in place to identify a needed site for a new senior school in the Wharfe valley or a new school in the village	103	There is no need for any additional modification. The need, as necessary, for supporting services and infrastructure will be considered as part of the Allocations DPD and if new schools are required sites will be identified within that document.
		45. A number of comments are received relating to an alleged lack of infrastructure including schools capacity, trains capacity, lack of car parking capacity particularly at rail stations, and traffic congestion on the A65.	6, 15, 36, 38, 46, 56, 70, 76, 77, 95, 103	<p>Although the proposed increase in the housing target for Burley is significant the Council do not think that the comments raise any new strategic issues that were not considered as part of the initial Examination hearings. There will be a need for a number of improvements to infrastructure within Wharfedale. The increased housing target for Burley may actually provide opportunities for a new infrastructure such as a new primary school that would not be available with a much lower housing target.</p> <p>The Council has produced an Local Infrastructure Plan to address infrastructure issues and this will be updated and developed further as work on the Allocations DPD progresses. The Local Infrastructure Plan work has involved consultation with utility providers. The Local Infrastructure Plan indicates a number of challenges in accommodating future growth but does not indicate any major infrastructure issues which are not capable of</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.
MM88 (Cont.)		<p>46. The Bradford Growth Assessment particularly notes that road and bus infrastructure for Burley-in-Wharfedale is not capable of significant capacity enhancements. It identifies park and ride facilities centred on the railway as the only means of significantly increasing current transport capacity for Burley-in-Wharfedale.</p> <p>However, there is no analysis of how these facilities are to be provided.</p>	76 76	The objector is slightly misrepresenting sentences from the study which are themselves taken from the District Wide Transport study. It is the role of neither of these documents to assess in detail the options for this area. The Transport Study recommends the development of more detailed corridor based studies to assess capacity issues and transport interventions and improvements. This will be done as part of the work underpinning the Allocations DPD. The study acknowledges that although the settlement has limited local employment opportunities, it does have good public transport links to the surrounding key employment areas and that these links could be enhanced. The Council considers the enhancement of these links is far more likely to be achieved with the settlement’s higher housing target and elevated status as a Local Growth Centre than as a Local Service Centre.
		<p>47. A series of objections have been made which express concern at the loss or green belt.</p>	15, 38, 70, 76, 95, 102	The Council has set out the exceptional circumstances which exist and which require the release of green belt land. It has also assessed alternative distributions of the housing requirement at the different stages of plan preparation. Green belt change will be necessary in most settlements within the district. Green belt change can be achieved in Wharfedale in sustainable locations and in ways which would not undermine the strategic functioning of the green belt.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		<p>Development will weaken the strategic function of the green belt in this area.</p> <p>Will lead to the coalescence of settlements</p>	<p>76</p> <p>38</p>	<p>This is not the case. The Bradford Growth Assessment states that the green belt in this area provides only a limited strategic role.</p> <p>This is incorrect. The proposed housing target would have to be much, much higher than that proposed for there to be any need or threat of coalescence. There is sufficient land available in locations which would not threaten coalescence, particularly to the west of the settlement.</p>
MM88 (Cont.)		<p>48. The SHLAA sites remove green belt around Burley in every direction – fears development would merge the settlements of Burley and Menston</p>	76	<p>The SHLAA does nothing of the sort as the SHLAA is not a policy document and does not allocate land or make changes to the green belt. It simply indicates currently identified site options, not all of which will be required to meet the proposed housing target. There would be no remote danger of any merger of the settlements of Burley and Menston, particularly if land releases are focused away from the east side of the settlement.</p>
		<p>49. Reference to Bradford Growth Assessment not supporting the removal of green belt around Burley</p>	76	<p>This is not correct. The role of the Bradford Growth Assessment was not to make specific recommendations of whether green belt should be released but to identify areas where there may be scope for releases should they be necessary.</p> <p>It does recognise the need to ensure that green belt releases maintain the separation of Burley and Menston but this is not an issue given the limited size of the housing target and the range of site options available including a sizeable site to the west of the settlement.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		50. Increasing the housing number for Burley is not justified as it would not prioritise the delivery and use of previously developed land	103	The Council disagrees. The availability of deliverable and developable brown field land has been assessed within the SHLAA and all of the potential supply of such deliverable or developable brown field land accounted for within the housing apportionments. Increasing the housing apportionment to other settlements (rather than Burley) including to Bradford would simply increase the green field land required there.
		51. A number of comments make reference to impacts on the countryside and landscape character	15,38	The Allocations DPD will assess the site options and seek to minimise landscape impact, avoid the loss of designated wildlife areas, and incorporate as appropriate mitigation measures. The Allocations process will also follow the principles set out in Core Strategy policy HO7 criteria F2 and G3,G4 & G5 of which relate to protecting these features.
		52. A number of respondents raise concerns about the flood risk as a result of the proposed housing.	36, 70, 76, 77, 95	All of the housing requirement for Burley can be met on land within flood zone 1. SHLAA land supply for Burley within flood zone 1 totals 1217.5 units. See also response to point 13 for the Council's overall approach to assessing flood risk and adopting a sequential approach in line with EA advice and guidance within the NPPF.
		53. References are made including photos of flooding at Manor park	36	The photo is not labelled and it is not specified where the land in the photo lies. Manor Park lies north of the A65 and well to the NW of the settlement of Burley in Wharfedale settlement tucked into a meander in the river Wharfe. Assuming this is the area being referred to it is not a site which is within the SHLAA and if it were much of lies within the functional

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				floodplain and thus would not be identified as a potential development site.
MM88 (Cont.)		54. There are other parts of the district which are far more suited to geographic expansion than the area along the Wharfe Valley	36	The size and scale of the housing requirement is such that many of those settlements will indeed be seeing expansion and in some cases of a much greater scale than that proposed in Burley.
		55. The proposed allocation of 700 dwellings is contrary to the emerging Burley Neighbourhood plan.	38	In fact it is the other way round. Neighbourhood plans are required to be in conformity with the strategic aspects of the Local Plan prepared by the Local Planning Authority. The Government are keen to see Neighbourhood Planning bodies working constructively with the Local Planning Authority where a new Local Plan is in preparation. The Council are working to support the Parish Council with its Neighbourhood Plan and will be ensuring that that neighbourhood Plan does not contain policies or proposals which do not conform to the Core Strategy or which are deliberately designed to frustrate the implementation of its strategic policies. It will also be working to ensure that the Parish Council produce a Neighbourhood Plan which conforms to the NPPF and is coherent, clear and deliverable.
		Representations Made Regarding the Menston Housing Target		
		56. Support the increased target of 600	34, 40, 41, 47	Support noted.
		57. We support the proposed increase of the requirement in Menston to 600 units. A higher reasonable level of development is capable of being sustainably accommodated together with a small reserve land component with limited further Green Belt releases.	113	The comments are noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		<p>58. We also support the increase in the broad distribution of housing for Menston from 400 to 600. Menston is a sustainable settlement and capable of accommodating at least 600 new dwellings over the plan period. We consider that the 600 dwellings should not be considered a maximum and where sustainable opportunities for new housing development are available these should be taken to contribute to meet the housing needs in an area where the market demand is strong.</p>	58	The support for the increased target is noted. The Policy HO3 housing targets are not expressed as maximums.
		<p>59. The housing requirement for Menston should have been increased to a higher level in view of its position in the settlement hierarchy and that in turn should reduce the units to be allocated to Ilkley.</p>	91	The Council have set out within MM88 its reasoning behind the modifications to the housing distribution as far as they relate to Ilkley and Menston. There is no logic to the proposed increase at Menston in conjunction to a reduction in Ilkley. Menston is a lower tier settlement whereas Ilkley is a Principal Town.
		<p>60. Objects to the change in status of Menston within the settlement hierarchy. The change to Local growth Centres has not been justified.</p> <p>Menston should not have been upgraded to a Local growth Centre just because of proposed changes to the HRA.</p>	27, 46, 51, 54, 55, 75, 77, 80, 95, 95	<p>The principle of whether Menston should be re-classified as a Local Growth Centre is dealt with under modification MM7 & MM8.</p> <p>Paragraphs 43.56 to 3.60 of the CSPD explain the role and derivation of the Settlement Hierarchy. They explain that the Local Growth Centres tier was created partly due to land supply constraints in the upper two tiers and partly due to the fact there are significant differences in the characteristic of the settlements below the Principal Towns level (some having better accessibility and /or better ranges of services and facilities) and differences in the potential for them to grow in a sustainable way.</p> <p>Menston was identified in the CSFED as a Local Growth Centre, informed by the Council’s Settlement Study, in recognition of its location</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)				<p>and accessibility to key transport links and its range of shops, services and community facilities.</p> <p>Its status was changed within the CSPD as a result of the HRA which indicated the need for restrictions of the amount of housing development in the areas within 2.5km of the S Pennines SPA & SAC. It was at that point no longer considered a settlement where significant growth could be accommodated so was placed in the bottom tier of the settlement hierarchy.</p> <p>However the subsequent revisions to the HRA have removed the need to take a highly precautionary approach in limiting development within the 2.5km zone and Menston has been re-classified as a Local Growth Centre accordingly.</p>
		<p>61. A number of comments are received relating to an alleged lack of infrastructure including schools capacity, trains capacity, lack of car parking capacity particularly at rail stations, traffic congestion on the A65</p>	<p>5, 6, 15,36,46, 51, 71, 75, 77</p>	<p>The Council considers that no new issues have been raised in the representations which repeat many of the points made in response to the CSPD. The Council has addressed these concerns within its response to the representations to the CSPD (document SD/009).</p>
		<p>A number of respondents raise concerns about the flood risk as a result of the proposed housing in particular ground water flooding.</p>	<p>5, 36, 51, 71, 75, 77</p>	<p>All of the housing requirement for Menston can be met on land within flood zone 1. SHLAA land supply for Burley within flood zone 1 totals 1076 units.</p> <p>See also response to point 13 for the Council's overall approach to assessing flood risk and adopting a sequential approach in line with EA advice and guidance within the NPPF.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		<p>62. All the sites surrounding Menston identified in the SHLAA are susceptible to groundwater flooding. This has been demonstrated by regular floods, most recently on 26th and 27th December.</p>	51, 75, 77	See response above and to point 13.
		<p>63. The 3 existing proposed sites in the former RUDP have as yet been undeliverable for exactly this reason. One site at Bingley Road has had planning permission refused because of flooding issues. This was due to be appealed at a Public Enquiry but the developer has decided to withdraw their appeal. Another site at Derry Hill is awaiting Judicial Review by the Court of Appeal and a third site at Bingley Road in Menston is awaiting the outcome of a recent Judicial Review.</p>	51, 75, 77	<p>The Council disagrees with the objector. It considers that the sites are sustainable and deliverable and does not agree with the view that the sites suffer from un-mitigatable flooding problems. The 3 sites are at various stages in the planning process and the Council considers that there is nothing to prevent these sites making a contribution to the Menston housing apportionment during the plan period. The current position on the three planning applications is outlined below:</p> <p><u>Derry Hill</u> 10/04551/MAF - Full application for 173 houses submitted 10.09.2010; Officer recommendation for approval; Approved by Committee 04.04.2103 subject to 106; Decision issued 24.10.2013.</p> <p>10/04551/SUB01 - application for approval of conditions including drainage conditions approved 15.08.2014. Judicial Review sought by Menston Action group (MAG) against approval of condition 15 on the grounds that the development was not based on sustainable drainage principles. The judge for the JR dismissed all of the grounds for the JR. However MAG were subsequently granted leave to appeal. Court of Appeal to consider case in July 2016.</p> <p><u>Bingley Road</u></p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

			<p>11/05691/OUT Outline application for up to 135 houses; submitted 19.12.2011; Officer recommendation for approval; approved by Committee subject to S106 04.04.2013; planning permission issued 09.04.2013.</p> <p>13/01479/VOC Application submitted 17.04.2013 for variation to condition 10. Application recommended for approval at Committee 10.10.2013. Committee approved the application subject to 106; planning permission issued 03.01.2014.</p> <p>13/04897/MAF Full application for 137 dwellings submitted 11.12.2013; officer recommendation for approval; Committee refused application 29.01.2015; decision issued 10.02.2015. Appeal lodged but subsequently withdrawn.</p> <p><u>Bingley Road (Chartford Developments)</u></p> <p>13/4451/MAF full application for 12 houses; application submitted 06.11.2013; officer recommendation for approval; Committee approved application subject to 106, 14.08.2014. Planning permission issued 02.04.2015.</p> <p>13/04451/SUB03 Application for approval of conditions including drainage conditions, approved 14.10.2015.</p> <p>JR sought against decision to issue decision notice and also decision to discharge the</p>
--	--	--	--

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				relevant drainage conditions. JR heard Jan 2016, and dismissed. No application for leave to appeal made.
MM88 (Cont.)		64. A series of objections have been made which express concern at the loss or green belt.	15	The Council has set out the exceptional circumstances which exist and which require the release of green belt land. It has also assessed alternative distributions of the housing requirement at the different stages of plan preparation. Green belt change will be necessary in most settlements within the district including Menston. The Council considers that green belt change can be achieved in Menston in sustainable locations and in ways which would not undermine the strategic functioning of the green belt.
		65. Bradford Council has previously illustrated in the Core Strategy Publication Draft how it would deliver the City’s housing targets without changes to the greenbelt in and around Menston, as such further changes to the green belt in Menston does not constitute exceptional circumstances to release additional land from the Greenbelt to meet targets.	51, 75, 77	<p>The Council disagrees. The Exceptional Circumstances are required to be demonstrated for the Local Plan as whole. These have been demonstrated based on the housing and economic needs of the district. The exceptional circumstances do not have to be determined on a settlement by settlement basis. Underpinned by the exceptional circumstances for green belt change policy SC7 sets out how the other local plan documents will consider the function of green belt when undertaking a green belt review and allocating land.</p> <p>It has been clearly demonstrated that the basis on which the status of Menston in the CSFED as a Local Growth Centre was downgraded and the housing target reduced was flawed due to deficiencies within the HRA. The original position in the CSFED was that it should see green belt releases to achieve a target of 900</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)				<p>dwellings over the plan period.</p> <p>The position within the CSPD and the reduced housing requirement would have potentially allowed the reduced housing target to be met without green belt changes. However the evidence and parameters which underpinned that position were flawed and have been reversed meaning the settlement once again has a target which will need some green belt releases.</p> <p>In putting forward its proposed changes the Council have reviewed all the updated evidence –not just the revised HRA - and come to a balanced position which actually keeps the Menston housing target to a lower level than that within the CSFED</p>
		<p>66. There are other parts of the district which are far more suited to geographic expansion than the area along the Wharfe valley</p>	36	<p>The size and scale of the housing requirement is such that many of those settlements will indeed be seeing expansion and in some cases of a much greater scale than that proposed in Burley.</p>
Representations Made Regarding the Silsden Housing Target				
		<p>67. Silsden not a sustainable centre</p>	102	<p>The Council disagrees.</p>
		<p>68. No justification has been given as to why certain areas have had their housing allocations increased.</p>	49	<p>It has. The justifications are set out in the Council’s main modifications document PS/G004a, particularly relevant being the changes to the settlement hierarchy (MM7 & MM8)and the changes to Policy HO3 (MM87 & MM88).</p>
		<p>69. A number of objections have been received which relate to the impact of the proposed development on services and infrastructure and that the areas cannot</p>	2, 10, 49, 102, 102, 118	<p>The Council considers that no new issues have been raised in the representations. The Council has addressed these concerns within</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		<p>accommodate new development.</p> <p>Particular concerns are expressed with regards to insufficient car parks which are already full, schools capacity, capacity of utilities such as electricity, health centres, traffic and congestion along Main Street, the need for a Silsden relief road</p> <p>The impact of the extra 200 houses has not been taken into account and there have been no revisions made to the Local Infrastructure Plan regarding the specific needs of Silsden.</p>	49	<p>its response to the representations to the CSPD (document SD/009). The strategic infrastructure issues are not significantly different just by virtue of the increase in housing target of 200 homes and any additional local issues raised as a result of the changes to the housing targets will be addressed within the Allocations DPD.</p> <p>Moreover the Local Infrastructure Plan is a live document which will be reviewed, updated and developed further as part of work underpinning the Allocations DPD. The need for road improvements, educational capacity increase and improved links to Steeton rail station are all matters capable of being addressed within the Allocations DPD and /or the emerging Neighbourhood Plan.</p>
		70. Objections due to the loss of more green belt	2, 10	Land supply data contained within the SHLAA indicates that it is likely that the Silsden housing target can be accommodated without the need for green belt change.
		71. In Keighley & Bradford there are plenty of brownfield sites	2	There are insufficient deliverable and developable brown field sites to meet the district’s housing needs. This is the case in all settlements.
		72. The latest Boxing Day floods 2015 shows, yet again, that severe flooding is a problem for certain parts of Silsden. A third of the proposed land sites allocated for building are on flood areas. Any further house building increases the flood risk for other areas of the town too. A properly agreed flood plan should be conducted before any further planning is allowed.	118	<p>It is unclear how this figure has been reached.</p> <p>The Council have prepared an updated flood risk sequential paper which maps the revised land supply within SHLAA against EA flood risk zones and calculates having regard to the modified housing targets whether those targets can be accommodated on land /sites within flood zone 1.</p> <p>The SHLAA already discounts sites totally as unsuitable if they lie within flood zone 3b (the</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)				<p>functional flood plain). SHLAA 3 data indicates a total deliverable and developable capacity of 2251.5 within and adjoin Silsden of which 2047.5 lies within flood zone 1. This is well in excess of the proposed housing target of 100 homes.</p> <p>The Council does acknowledge that further flood risk assessment work will need to be carried out as part of the Allocations DPD including a Level 2 Flood Risk Assessment and this will look at sources of flooding and advise on necessary mitigation measures.</p>
		<p>73. The houses should be built closer to the Bradford centre where they are actually needed. This will meet the demand of the expected rapid growth in population in the areas where housing is required. In particular, in the Bradford South East area, where the results of the Bradford Growth Assessment, identified a particular focus for growth.</p>	118	<p>The Core Strategy already proposes substantial housing growth in the Regional City and at a scale far in excess of that being proposed within Silsden.</p>
		Representations Made Regarding the Baildon Housing Target		
		<p>74. The modification is sound. Historic England state that the suggested change in the housing requirements for Baildon and Howarth now provide a greater degree of confidence that sufficient land will be able to be identified to meet their respective totals without harming the Outstanding Universal Value of Saltaire in the case of the former, or the character and landscape setting of Howarth in the case of the latter.</p>	9	<p>Support noted.</p>
		<p>75. The Baildon target should not have been reduced in order to allow a lower requirement for Bradford SE / Tong valley</p>	79	<p>The Council disagrees. The proposed lower target for Baildon reflects the concerns raised by English Heritage and will minimise the risk that sites which could adversely affect the setting of the Saltaire World Heritage site.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		76. Baildon town council welcome the reduction in housing allocation for Baildon but feel that more note needs to be taken of the effect development in a large part of Baildon could have on the Saltaire Heritage Site.	14	The potential for impact on the Saltaire World Heritage Site was the main reason for the reduction. English Heritage are now satisfied that the proposed reduced housing target can be accommodated without such adverse effects.
		77. The reduction in number of residential units projected in the Modifications for Baildon from 450 to 350 is welcomed.	96	Noted.
		78. The number should be reduced to a level i.e. below 295 where no need for green belt use is required.	96	The Council disagrees. The housing apportionment for Baildon can be accommodated in a sustainable way and reflects a range of criteria as explained within both the Core Strategy and the Council’s housing background paper (SD/016).
		79. The number should be reduced due to the significant alteration to the projected rate of job creation in the District as shown in MM65 (and MM67).	96	The modification to the job creation figure quoted within Policy EC2 and set out in MM65 has no bearing or consequence on the housing requirements as the higher jobs target was never used within the housing requirement modelling work. As set out within document EB/033 the Housing Requirement Study used the REM jobs growth forecast of 1,604 per annum.
		80. There should be a greater commitment to improving the local infrastructure, including the road accesses to these centres. And the Shipley Eastern relief Road	14	As the objector notes the Core Strategy already includes reference to the Shipley Eastern Relief Road.
		81. The recent floods and the consequent flooding of houses recently built at Berry Drive, call into question the viability of any housing developments within Lower Baildon.	14	As far as the Core Strategy definitions are concerned the area to the south side of Otley Rd described as Lower Baildon lies within the eastern part the Shipley settlement area. The Shipley housing target is not dependent on sites / land in that area much of which lies within flood zone 3a.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				Furthermore the Council will be updating its evidence and analysis of flood risk and assessing all sites as part of the Allocations DPD to ensure that flood risk is minimised, sites at greatest risk avoided and appropriate mitigation measures identified. There is sufficient land within the Shipley area within flood zone 1 to meet virtually all of its 750 target.
MM88 (Cont.)		82. The objection made by English Heritage lacks supporting evidence and too much weight has been placed on the objection	94	<p>The Council disagrees. It has given due weight to the views of English Heritage as a key statutory consultee and due weight to the importance of preserving key assets of national and international importance such as the Saltaire World Heritage Site.</p> <p>English Heritage has made its assessments having regard to the currently known land supply within the SHLAA and by reference to documents such as the Saltaire World Heritage Site Environmental Capacity Study and the World Heritage Site Buffer Zone. The need to protect the Outstanding Universal Value of the World Heritage Site and the need for care in the planning of sites within its buffer zone are given due weight and importance in both the current statutory development plan and in the Core Strategy (Policy EN3).</p>
		83. The English Heritage objection is premature as it relates to considerations relevant during the preparation of the site specific Allocations DPD	94	The Council disagrees. Because the Core Strategy sets housing quantum on a settlement by settlement basis it has to ensure that there is a reasonable degree of confidence that there is a sufficient supply of land available to meet the proposed targets and that the targets will not cause significant adverse

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)				<p>effects on key environmental assets. If there is a reasonable level of doubt over whether those targets can be achieved without adverse effect and also if there are clear alternative distribution options which would avoid the risk of such adverse effects then it is a reasonable, balanced, evidenced and appropriate decision to make that change and pursue those alternatives.</p> <p>The SHLAA sites and associated housing capacity data allows those risks to be assessed in broad terms and evaluated.</p>
		<p>84. The proposed modification fails to provide owners of potentially developable sites within Baildon with the proper opportunity for their sites to be appropriately considered as part of the site allocations process.</p>	94	<p>This is simply not true. The Allocations DPD process will consider all site options in the Baildon area and seek to allocate the most sustainable sites having regard to evidence and having taken account of engagement with all stakeholders including those land owners promoting their sites. This has not changed simply because the target for Baildon has been slightly reduced.</p> <p>All sites, including those which English Heritage consider may adversely affect the World Heritage Site will be assessed. The Council will look to see if those sites can be developed including options to use design, landscaping and reductions in site capacities to mitigate any adverse effects. Sites will be assessed in their own rights and compared against reasonable options in that area. Consultation and engagement will allow the work and assumptions underpinning site assessments to be commented upon and challenged.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		<p>85. By restricting the overall amount of development in Baildon and pushing development towards Council owned land in Baildon it will increase the value of Council owned land in Baildon. Therefore the proposed modification represents a conflict of interest of the Council</p>	94	<p>These comments are incorrect and unsubstantiated. They are also professionally insulting. The only role which land ownership plays is in informing the deliverability and developability of sites within the SHLAA (the ‘availability’ test). Here the issue is simply whether a site’s owner is promoting or agreeing to release a site. Council land ownerships have in no way influenced the derivation of housing targets and played no role in the decision to reduce the Baildon housing target or indeed the decisions to change any settlement housing target.</p>
		<p>86. Pushing further development towards Silsden may result in the proposed 5 year land supply being undeliverable and thus non-compliant</p>	94	<p>The Council disagrees with these comments. There is no direct relationship between the reduction in the Baildon housing target and the increase in the Silsden target. Indeed the main factors underpinning these changes are entirely different, one being related to evidence of a somewhat lesser potential environmental impact that was previously assumed and the other being related to evidence of a greater than previously assumed impact.</p> <p>Moreover there is no convincing evidence to suggest that the changes between the two settlement targets will have any bearing on the maintenance of a 5 year land supply. The SHLAA indicates that there are deliverable and developable sites sufficient to meet the housing targets in each location and the plan as a whole will be releasing substantial quantum of new housing land to boost housing delivery and ensure a 5 year land supply is put in place.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		87. To simply assume (based on English Heritage’s comments) that a significant number of the sites identified by the SHLAA as potentially achievable would not be achievable would be premature at this stage	94	Please see the responses above. There is a logic and evidence underpinning the comments made by English Heritage. The Council have assessed those comments and take a balanced and informed decision having looked at the SHLAA sites concerned. It has not ‘simply assumed’ anything.
		88. Many of the sites within the Baildon SHLAA are shown as achievable now but the market has failed to bring the sites forward. This suggests there are deliverability / viability issues with these sites.	94	The comments and analysis are not justified and are incorrect.
		89. There is a generally accepted need for additional housing in Baildon. This is reflected in the SHLAA section 4.1 of the Rombalds Ridge Landscape Character SPD	94	While it is reasonable to assume that there is a need for new homes within the Baildon area the objector provides no evidence to suggest that need would be met by a housing target of 450 dwellings but would not be met by a target of 350 dwellings. Neither the SHLAA nor the Landscape Character SPD have a role in assessing housing need in the district.
		90. We object to the proposed reduction to the requirement in Baildon and advocate an increase to 600 units. Carefully planned development will ensure existing community facilities, services and businesses continue to be supported. This level of development can be accommodated while preserving the key elements of the setting of the World Heritage site of Saltaire.	113	The Council disagrees and points to the objections raised by English Heritage. A target of 600 dwellings would not be a sustainable approach in a 4 th tier settlement subject to significant environmental constraints.
Representations Made Regarding the Haworth Housing Target				
		91. The reduction in the proposed housing number for Haworth from 500 to 400 units is not considered to be justified, effective or positively planned. We would question whether it is within English Heritage’s remit to comment on the impact of developments on the landscape setting of an area.	109	The Council disagrees. It has given due weight to the views of English Heritage as a key statutory consultee and due weight to the importance of preserving key assets such as the character and setting of Haworth and its Conservation Area.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)				<p>Positive planning is not just about increasing housing delivery and setting ambitious housing targets, it is also about taking decisions which meet the districts needs in ways which minimise adverse impact on its heritage assets.</p> <p>The Council suggest that it is for English Heritage, not the objector, to determine what issues and matters English Heritage comment on.</p>
		<p>92. Our Client is very concerned that the Council are proposing to reduce the housing target in Haworth on the basis of English Heritage’s comments.</p>	109	<p>English Heritage has made its comments having regard to the currently known land supply within the SHLAA and by reference to documents such as the Haworth Conservation Area Assessment.</p> <p>It has clearly articulated the reasoning behind its conclusions.</p>
		<p>93. Of all sites put forward for consideration in the SHLAA within Haworth, there would be a total yield of 1,353 units, which is nearly three times more than the original Core Strategy target of 500 units over the plan period. It is acknowledged that not all sites will be suitable for development, however there is in fact a significant margin of flexibility.</p>	109	<p>The Council disagrees. Because the Core Strategy sets housing quantum on a settlement by settlement basis it has to ensure that there is a reasonable degree of confidence that there is a sufficient supply of land available to meet the proposed targets and that the targets will not cause significant adverse effects on key environmental assets.</p> <p>If there is a reasonable level of doubt over whether those targets can be achieved without adverse effect and also if there are clear alternative distribution options which would avoid the risk of such adverse effects then it is a reasonable, balanced, evidenced and appropriate decision to make that change and</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)				<p>pursue those alternatives.</p> <p>Given that Haworth sits within the bottom tier of the settlement hierarchy and therefore in broad terms is relatively less sustainable as a location for growth, there is no overriding strategic justification to opt for higher housing targets than are necessary or to opt for targets which raise concerns over impacts on key environmental assets.</p> <p>The Council also considers that there is less flexibility in the land supply than the objector implies. Haworth is a good example of where it is important to drill down to the nature of the land supply and not just rely on the headline figure. Only 258 of the 923 capacity lie on sites classified as suitable now while the majority of the rest lie in areas subject to current policy constraints. For example over 400 of the capacity lies on green belt sites. English Heritage has also referred to a number of sites which may have adverse impacts on the Conservation Area.</p>
		<p>94. English Heritage imply that all sites which could harm the setting of the village and the character of the Conservation Area should not be allocated, however this is too simplistic and no evidence is provided to demonstrate that development of such sites would harm the Conservation Area, other than the simple fact that they happen to be located within it.</p>	109	<p>This is not true. English Heritage have made reference to four sites where there are potential concerns and the Allocations DPD will make full assessments of those sites in due course.</p>
		<p>95. There is no acknowledgement of the tests of the Planning (Listed Buildings and Conservation Areas) Act 1990 which states that development within a conservation Area should preserve or enhance the asset, thus setting a test of neutrality. Providing that development is sensitively</p>	109	<p>There point is not relevant. The sites will be tested and assessed as part of the Allocations DPD and as part of that process the possibility that those sites could be developed if sensitively designed will be considered.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		designed, this should ensure that development within and adjacent to Conservation Areas preserves the asset.		However the Core Strategy is a strategic document making decisions about the best and most sustainable options for the distribution of housing growth among other reasonable deliverable options. Pursuing a modest reduction in an area where development may cause impacts to an asset of acknowledged importance and following the advice of the national statutory body for the conservation of the nation’s heritage is in the Council’s view an appropriate response.
		96. The correct approach to this matter is not to reduce the housing target, but to introduce a development management policy through the Site Allocations DPD which seeks a sensitive design within and adjacent to Conservation Areas.	109	The Council disagrees. The Council has taken the decision to indicate housing quantum at a relatively small geographical scale within the Core strategy. It must therefore ensure that the targets proposed are capable of being delivered in a way consistent with the policies within the NPPF which include the protection and enhancing of conservation areas and their settings. If there is reasonable and justified doubts that the proposed housing quantum might cause damage it would not be appropriate to pursue such a target nor would it be appropriate to rely on the sort of generic development management policy quoted.
		97. English Heritage do not appear to acknowledge that the SHLAA is an evolving document and new sites can be put forward and those sites which may currently be assessed as ‘red’ such as our Clients (HA/013), could be reassessed as either ‘amber’ or ‘green’. Our Client’s site was dismissed on the basis of ‘limited information has been submitted to allow proper consideration’. New supporting information has been submitted which demonstrates that the site is suitable, achievable and available and would not adversely impact upon the	109	Firstly while it is true that the SHLAA is an evolving document the Council has to determine its strategic policies now and on the basis of the evidence available now. Secondly – as the objector has already acknowledged, the SHLAA is an evolving document and just because a site is classified red now does not mean in the next SHLAA update it could not be re-classified, particularly

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		Conservation Area.		<p>if new information or circumstances arise.</p> <p>Finally, at the time of preparation of the third SHLAA, while the site had been submitted as a call for site, the owner had supplied virtually no information or evidence in support. The new information was submitted in December 2015 well after the SHLAA was completed.</p>
		98. It is considered that 500 units can be delivered within Haworth without adversely impacting upon the historic setting of Haworth.	109	English Heritage disagree and the Council consider that sufficient grounds exist to justify a small change to the distribution accordingly.
		99. Haworth is a sustainable settlement with a number of key services and the growth of the settlement should not be restricted.	109	<p>It is entirely within the reasonable bounds of a Core Strategy to set a housing target for the settlement of Haworth and thus in doing so place restrictions on the level of development that will occur. To suggest otherwise is ridiculous.</p> <p>The objector does not appear to have questioned the soundness of the settlement hierarchy with regards to Haworth. Within the settlement hierarchy defined within Policy SC4, Haworth is designated within the bottom tier as a Local Service Centre.</p> <p>These are generally the smallest settlements in the district and those which either have a smaller range of services or which are relatively less well located in relation to larger centres and / or public transport. The Council therefore disagrees with the implication made by the objector that Haworth is suitable for significant growth and considers that there is no justification for a higher target.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

Objections to targets where no modifications have been proposed.				
MM88 (Cont.)		100. A significant number of representations have been made relating to the housing targets for areas where no modification has been proposed. In many instance the arguments repeat those made in objections to the CSPD. These representations are set out below:		
Representations Made Regarding the Addingham Housing Target				
		101. The unchanged allocation for Addingham of 200 houses is welcomed as manageable if implemented Sensitively	69	Support noted.
		102. A number of objections have been received to the housing proposed within Addingham which essentially repeat issues and concerns already raised at the previous consultation stage. They include Loss of green fields and spaces, the view that more homes should be built within Bradford instead and that empty properties in Bradford should be used first.	7, 111	The Council has already addressed these issues in its previous Statement of Engagement (document SD/009 Appendix 7J).The Core Strategy is focusing growth on the Regional City and is making an allowance for a reduction in empty homes.
		103. We maintain our previous objection that the Addingham requirement should be 275	113	No new arguments evidence or justification has been made.
		104. Objects. Addingham is a settlement identified for growth as a Local service Centre.	110	This is incorrect. The smaller settlements within the district considered to be sustainable locations for growth are those within tier 3 i.e. Local Growth Centres. Addingham is within the bottom tier of the settlement hierarchy and classified a Local Service Centre.
		105. There is a clear need for Addingham to have new homes with an average household size of 2 (the district average being 2.5), 20% of the population being over 65, compared to the 13.2% district average and a recent population decrease of 1.2% as opposed to the average district growth of 12.9%	110	The matters raised do not constitute a valid reason to increase the housing target and set aside the other justified reasons for adopting a modest figure in what is a relatively unsustainable location for significant growth. Addingham has been allocated a target of 200 new homes which is considered appropriate.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		106. Objects as the housing numbers have been increased in 3 out of the 4 settlements within Wharfedale but not in Addingham	65	The Council have focused the limited upward revision of housing targets within Wharfedale on the more sustainable settlements in line with the settlement hierarchy.
		107. The Council have since accepted that the HRA was unsound and as a result the level of homes have been reinstated to the pre-reduction levels, apart from Addingham, which remains in MM88 as a proposed 200 new homes.	65, 110	The levels of housing have NOT been fully reinstated to pre-reduction levels and there is no reason why this should be the case anyway as the Council has to propose an amended distribution which reflects the most appropriate and sustainable option given ALL the new and updated evidence not just that of the revised HRA. For example the district housing requirement is lower and the land supply evidence in the SHLAA has been updated.
		108. Our Client understands this rationale and the notion of the settlement hierarchy and does not propose for a reduction of homes in these settlements. However our Clients objection relates to the lack of redistribution horizontally amongst the Local Service Centres, which should take place.	110	The Council does not accept the logic or validity of a crude approach which seeks to maintain exactly the same proportion of the housing requirement in a tier of the settlement hierarchy at each stage of the plan’s preparation. The distribution will inevitably change, a little, not radically, simply because of changes in the evidence base and the information and circumstances as time progresses. It also does not consider that there was any need or justification to lower other Local Service Centre targets simply to accommodate an increase in the target for Addingham.
		109. Addingham has historically been identified as one of the most sustainable, if not most sustainable of the Local Service Centres.	110	The Council is not clear what is being referred to. Clearly there will be variations in sustainability but Addingham is not considered by the Council to be amongst the most sustainable of the 4 th tier settlements.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM88 (Cont.)		<p>110. Attached to this letter is a table which identifies Local Service Centre Provision and the Councils scoring mechanism. Previously the HRA was included as a negative score, which reduced Addingham’s sustainability. With this corrected it is clear that Addingham scores 17 points and has equal top rank.</p>	110	<p>The Council does not agree with the points raised. To be clear the table and scoring mechanism presented by the objector did not form part of the housing distribution process. The objector has picked a narrow range of indicators and their conclusion that Addingham is the most sustainable (number one ranked) of all the Local Service Centres is not justified or sound.</p> <p>In fact the Council would argue that it is difficult to actually rank Local Service Centres because they vary in size and nature and in most cases an individual Local Service Centre may perform well against some indicators and less well against others. For example Addingham benefits from a reasonable range of services and is middle ranking in size being larger in population terms than some centres such as Oxenhope, Harden and East Morton but smaller than other such as Baildon, Haworth and Cottingley. On the other hand Addingham is one of the most geographically peripheral of the centres within the district, does not have any major employers, does not have either a high frequency bus service or close access to a rail station. Unlike some of the Local Service Centres such as Oakworth, Haworth and Baildon, it is not located close to either of the two largest employment centres within the district i.e. Keighley and Bradford and is not in a key employment and regeneration corridor with access to several employment centres unlike Cottingley and East Morton.</p> <p>The Council therefore re-affirms its view that in the context of a limited adjustment to the housing distribution and in the context of the updated evidence and the application of the</p>
--------------	--	--	-----	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				settlement hierarchy, the Council's proposal not to amend or increase Addingham's housing target is justified, reasoned and sound.
MM88 (Cont.)		111. In the CSFED, Addingham had 11.4% of the Local Service Centre homes, compared to the current 7.8% proposed. With the removal of the HRA and its subsequent reduction, a proportional reduction as proposed by the Councils background paper would result in Addingham retaining 11.4% of the homes and a subsequent increase to 291 homes.	110	The Council have never adopted a distribution methodology which first sets a total for a tier of the settlement hierarchy and then sets the individual settlement targets by reference to a preferred proportion of that total. Such an arbitrary statistical approach would not be appropriate as the chosen option has to reflect the evidence and be the most appropriate and sustainable option.
		112. The sustainability table shows that Addingham is the most sustainable of the settlements in this tier of the hierarchy and removal of the HRA as accepted by the Council would increase the scores in the growth paper. At present the Council have removed the HRA but not followed this through to amend the growth paper scores and the vertical distribution. Addingham currently has a population of 3172 people with only 200 homes proposed (6.21%) as opposed to settlements such as Denholme with a population of only 2715 but 350 new homes at 12.89%.	109	The Growth Assessment was designed and carried out to test the extent of unconstrained land around settlements which might, if needed, be released for housing. It also carried out a broad brush assessment of the environmental, social and economic characteristics of the settlements and scored a number of strategic land parcels and SHLAA sites accordingly. While the objector may wish to postulate on how scores may have changed if different assumptions were made it is clear that Addingham scored poorly in comparison with other fourth tier settlements and there is no compelling case for any increase in Addingham's housing target based on that study.
		113. East Morton target of 100 produces a population growth has fewer facilities but has 7.64% proportion of growth to population as compared to 6.31%	109	The Council does not consider this to represent any sort of case for an increase in Addingham's housing target. Addingham already has double the target proposed for East Morton.
		114. The Council's Settlement Study lists four key planning	65	The provision of 200 new homes will make a

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		<p>issues for Addingham – two of them – population imbalance lack of and need for affordable housing. The reduced housing figure of 200 homes is unlikely to address these. A reduction in half of the housing target will also mean that identified gaps in provision such as a park and children’s play areas will remain unmet.</p>		<p>contribution to the need for affordable homes and family homes. The provision of new or improved play provision within an area is not necessarily dependent on new housing development being permitted which will in any case itself generate more need for such provision.</p>
MM88 (Cont.)		<p>115. BH&DWH has concerns regarding the distribution of housing as it relates other settlements</p> <p>Silsden, which is a Local Growth Centre, now has a higher housing figure proposed than Ilkley (1,000 homes) which is a Principal Town.</p> <p>Addingham is situated just 3.9 miles from Silsden and could accommodate some of the additional housing proposed for Silsden.</p> <p>BH&DWH notes that housing numbers are reduced for Baildon and Haworth based on English Heritage concerns. Some of these reduced housing figures could be apportioned to other settlements at Local Service Centre level such as Addingham</p> <p>BH&DWH remains concerned about the amount of housing being apportioned to Keighley. As noted in our Statement of Case for the Examination BH&DWH is currently developing out a housing site in Keighley, where low-market values constrain viability. It is considered that the housing figure for Keighley should be reduced and</p>	65	<p>Silsden also had a higher housing target (1000) in the CSFED than Ilkley (800) so this is nothing new. A settlement’s housing target has to reflect a range of criteria and evidence and the settlement hierarchy is only one such element.</p> <p>This would not be appropriate or sustainable. Silsden is a Local Growth Centre, a much larger settlement and a more appropriate location for housing growth.</p> <p>It would be a more sustainable option to allocate those homes to higher order settlements.</p> <p>The Council disagrees and this is a repeat of earlier representations. It should be noted that there are a variety of developer led representations on the most appropriate housing target for Keighley. Johnson Brook</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		more housing apportioned to lower tier settlements (Local Growth Centres and Local Service Centres) where delivery is more likely.		who represent a consortium of housing developers for example suggest the Keighley target should actually be higher and presumably do not share the same concerns about viability and deliverability. The Council considers the proposed Keighley target of 4,500 is sound and appropriate.
Objections to Other Targets Which Area Not Subject to Modifications				
MM88 (Cont.)		<p>116. In the following cases objections are raised to the housing targets proposed, re-iterating previous objections: We maintain our previous objections:</p> <ul style="list-style-type: none"> • the Cottingley requirement should be 275 • the Bingley requirement should be 1,600 • the Denholme requirement should be 500 • the Keighley requirement should be 5,000 • the Queensbury requirement should be 1,300 • the Steeton requirement should be 1,150 	34, 113	No new arguments, evidence or justification have been made. The Council refers to its responses in document SD/009
MM89	Policy HO4	<p>1. We warmly welcome the clarification of phasing policy, and recognition of the fact that phasing does not constrain the meeting of housing land supply.</p> <p>We also strongly support the ‘Liverpool approach’ to catching up with a historical backlog of completions, since this provides a sound basis for delivery that does not put unrealistic demands on the five-year land supply.</p>	114	Support noted.
MM89		<p>2. A number of objections are made not to the modification itself but re-iterating previous objections to the principle and appropriateness of the phasing policy. The arguments include that:</p> <ul style="list-style-type: none"> • The policy will undermine 5 year land supply, conflict with NPPF paragraph 47, will unduly promote previously developed sites with viability issues. 	34, 65, 78, 113	The Council disagrees with these views and considers that all of these arguments and viewpoints have been aired previously and raise no new issues and therefore refers to the Council responses in the following documents: SD/009 PS/E007b and PS/F061 & PS/F086m

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM89		<p>3. We recommend that the Council’s suggested choice of year 8 (2022/23) of the plan period as the main release trigger is too late in the process and consider the second phase of sites should be released in year 5 of the plan period (2019/20).</p>	113	This would render the phasing policy pointless and ineffective and is in effect a cynical proposal which would release all sites just 1 or 2 years after the likely adoption of the new Allocations DPD.
		<p>4. If a phasing policy remains then policy HO4 needs to have a mechanism to ensure that all settlements identified within the settlement hierarchy deliver housing constantly throughout the plan period.</p>	65	If taken literally this proposal is ludicrous. Most sites deliver on average 30-40 completions per annum. Adopting such an approach would either mean trying to enforce a limit of only 2 completions per year on a site in a location such as East Morton which has a target of 100 new homes or raising every settlement’s housing target to a minimum of (35 x 15 = 525) 525 homes.
		<p>5. BH&DWH objects to the inconsistent approach relating to the proposal not to make the two AAPs within the plan area the subject of a phasing policy.</p>	65	<p>What the Council have done is to propose that all the land within the AAP’s is released in phase 1 which the objector would presumably support as it would boost the total phase 1 supply in the district overall and be in the areas where housing need and the need for regeneration is greatest.</p> <p>The reasons for the approach within the two AAP’s is clearly set out in the main modifications document PS/G004i.</p>
MM90	Policy HO4	<p>1. We warmly welcome the clarification of phasing policy, and recognition of the fact that phasing does not constrain the meeting of housing land supply.</p> <p>We also strongly support the ‘Liverpool approach’ to catching up with a historical backlog of completions, since this provides a sound basis for delivery that does not put unrealistic demands on the five-year land supply.</p>	114	Noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM91	Policy HO4	<p>1. We warmly welcome the clarification of phasing policy, and recognition of the fact that phasing does not constrain the meeting of housing land supply.</p> <p>We also strongly support the ‘Liverpool approach’ to catching up with a historical backlog of completions, since this provides a sound basis for delivery that does not put unrealistic demands on the five-year land supply.</p>	114	Noted.
		<p>2. Support the reference to release of additional housing sites to meet the shortfall in the 5 year land supply, especially phase 2 sites.</p>	34	Support noted.
		<p>3. The HBF support the inclusion of criteria D and E (MM91) and the additional supporting text (MM92) which will provide a more responsive mechanism for bringing forward sites from later phases. This will assist in addressing issues such as under-delivery and ensuring that larger more complex sites, with longer lead-in times prior to development commencing, can assist in delivering the overall plan requirements. However this does not override the HBF’s fundamental objection to the phasing policy.</p>	78	Comments noted
		<p>4. The addition of Criterion D is welcomed, which allows for bringing forward certain sites which will have a long gestation and delivery periods, which necessitates their early release.</p>	113	
		<p>5. If the Inspector does not agree with the view that Policy HO4 should be deleted, we do however consider that the proposed modifications to HO4 do at least address concerns that large or complex sites should be brought forward in the identified first phase, to give them the maximum opportunity of being able to deliver in full during the plan period.</p>	104	Comments noted

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		This additional criterion is therefore justified insofar as it will allow such sites to deliver in full in the plan period and therefore ensure that the overall housing requirement of the District is fully met. It will also assist in facilitating early delivery of infrastructure associated with such sites.		
		6. The policy should specify or clarify which sites will be released in phase 1 under criterion D	39, 66, 113	The Council will assess and determine in consultation with stakeholders and the public how sites should be phased (should Policy HO4 remain within the plan) as part of the Allocations DPD. It is not possible to say now ahead of more detailed work which sites will be allocated let alone which will need early phasing under this criterion.
		7. Our Client is encouraged by the provision of criterion E (MM91) which states that the Council will consider releasing subsequent phases of allocations to maintain a five year supply where there is a persistent shortfall. Notwithstanding this, our Client objects to the use of the Liverpool approach and consider that the Sedgfield approach should be used.	109	The Council has already set out the reasons for its proposed use of the Liverpool approach within the main modifications document MMPS/G004a and within documents PS/F061 ,PS/F063 PS/F086h and PS/F086i.
		8. The proposed additions of Criterion D and E to this policy, whilst being welcome additions do not address our overriding objections.	113	Noted.
		9. Arguments are made for more detail including trigger mechanisms and definitions of ‘persistent shortfall’	113	More detail would not add to the clarity of the plan and in any case can be addressed within the Allocations DPD. The plan as the objector acknowledges already includes a definition of persistent shortfall within MM92.
MM92	Paragraph 5.3.89	1. We warmly welcome the clarification of phasing policy, and recognition of the fact that phasing does not constrain the meeting of housing land supply. We also strongly support the ‘Liverpool approach’ to catching up with a historical backlog of completions, since	114	Noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		this provides a sound basis for delivery that does not put unrealistic demands on the five-year land supply.		
		2. Our Client supports MM92 which states that the Council will consider the early release of phase 2 sites Strategy DPD – Proposed Main Modifications 25419/A5/CSREPS/CA 7 January 2016 in the event of persistent shortfall. The inclusion of a definition of a persistent shortfall is also welcomed.	109	Noted
		3. Welcome the addition of the new text at para 5.3.75 that ‘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’.	65, 113	Noted
		4. Welcome the addition of new text at para 5.3.76 relating to the for early phasing of large or complex sites.	113	Noted
		5. We believe that criteria D should specify which large and complex sites are referred to.	39	See response to MM91 above.
		6. It is unclear which large and complex sites are being referred to. The infrastructure implications of such a large planned development referred to as the Holme Wood Urban extension are immense, particularly regarding access, congestion, increasing flood risks, that it would be unsound to ‘fast track’ or make an early start on the development.	66	The Council will assess and determine in consultation with stakeholder and the public how sites should be phased (should Policy HO4 remain within the plan) as part of the Allocations DPD. Based on the comments made by this responded it appears that they would support the argument that the Holme Wood urban extension would be the sort of site which would meet the terms of criteria D and which should therefore be brought forward early in the plan period.
		7. Support the reference to release of additional housing sites to meet the shortfall in the 5 year land supply, especially phase 2 sites.	34	Support noted and welcomed
		8. A number of objections are made not to the modification itself but re-iterating previous objections to the principle	40, 41, 47, 65, 108	The Council disagrees with these views and considers that all of these arguments and

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		and appropriateness of the phasing policy		viewpoints have been aired previously and raise no new issues and therefore refers to the Council responses in the following documents: SD/009 PS/E007b and PS/F061 & PS/F086m
		9. Object to the use of the Liverpool approach which would be unjustified and ineffective and inconsistent with the NPF. The Sedgefield approach should be followed.	40, 41, 47, 65, 113	The Council has already set out the reasons for its proposed use of the Liverpool approach within the main modifications document MMPS/G004a and within documents PS/F061 ,PS/F063 PS/F086h and PS/F086i.
		10. In relation to Appendix 6 which is referenced in 5.3.77, this should be referred to as an indicative housing delivery trajectory.	113	There is no need to make this change.
MM93	Policy HO5 Paragraph 5.3.77	1. Our Client welcomes MM93 which provides greater flexibility in terms of housing density.	109	Noted.
		2. We welcome the addition of reference to ‘most’ developments rather than ‘all’ developments achieving a minimum density of 30 dwellings per hectare.	113	
		3. The proposed main modification to paragraph 5.3.77 indicates that the minimum density requirement of 30dph can be varied, although it does not provide any further information regarding the circumstances where variations may be required.	78	Paragraph 5.3.80 provides guidance and no further text or changes are necessary.
		4. To ensure that Policy HO5 is consistent with other Core Strategy policies and takes account of site specific issues it is recommended that reference to the fact a lower density may be acceptable having regard to site layout and characteristics, infrastructure provision, local needs and demands as well as viability. This reference could either be included as part of the policy or within the supporting text.	78	No such change is necessary; the text at paragraph 5.3.80 already recognises that higher or lower yields may be negotiated.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		5. Whilst Keyland Developments recognises that greater flexibility has been added to this policy, the need to set a density requirement is considered unnecessary and unjustified.	108	The Council considers that it has already demonstrated the need and justification for the policy. Using land efficiently will ensure sustainable patterns of development, reduce journeys and Co2 emissions, and minimise the need for green belt releases.
		6. We do however maintain our view that the target of 90% of units on completed housing schemes to be at a minimum of 30 dph is unrealistic and unachievable and suggest this target is reduced.	113	The target does not form part of the policy itself. There is no need for a change.
		7. It would be helpful if additional text were added to the justifying text to Policy HO5 explaining where a lower density of less than 30 dph is acceptable. Bradford has a number of localities where topographical constraints on their own, or in combination with other constraints, limit the overall net site density which can be achieved.	113	There is no need. Also the policy allows for the setting of different density targets specific to local areas within the Local plan. This will be a matter for the Allocations DPD to consider.
		8. The Yorkshire Greenspace Alliance re-iterate previous objections suggesting that development should not be below 45 dwellings per hectare. They suggest the policy represents a dispersal of allocation away from the inner urban areas where density assumptions are higher	93	No new issues are raised nor has evidence been provided. Such a target is not justified and could hinder delivery. Moreover if there are parts of the district where such a density could be appropriate and could be achieved then the Allocations DPD can pursue such an option.
MM95	Paragraph 5.3.81	1. Whilst Keyland Developments recognises that greater flexibility has been added to this policy, the need to set a density requirement is considered unnecessary and unjustified.	108	The Council disagrees.
MM96	Policy HO6	1. Policy HO6 – Previously Developed Land The modification removes the words ‘minimum’ before the previously developed land targets.		
		2. The Government is saying Brownfield first yet the Core strategy document is biased in forming a greater percentage of the homes in green belt	27, 77	This is an incoherent comment which does not relate to an modification and is also mistaken in that there is no brownfield first policy within

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				the NPPF.
		3. 50% of Brownfield usage is below the Governments suggestion of over 80%.	27, 77	The Government’s policy as set out in the NPPF is that it is for Local Planning Authorities to consider whether to set targets for the use of brown field land but if they do so, such targets must be based on evidence of the deliverable and developable land supply which is contained within the SHLAA. The Council’s SHLAA clearly demonstrates that setting a higher brown field target would be unachievable.
		4. The Society supports the policy that 50% of land allocated for development in Principal Towns should be on previously developed land and expects to see this applied to Ilkley in the Allocations DPD.	54, 55	The Society misunderstands and misinterprets the policy, perhaps deliberately so. First of all the brownfield percentages quoted in the policy are not requirements, they are targets. Secondly, the supporting text for the policy clearly indicates that the target for the Principal Towns is for the group of Principal Towns as a whole and does not apply specifically to each town. There is therefore nothing indicating a target of 50% PDL for Ilkley in the Core Strategy and the Allocations DPD is not required and will not be allocating sites in Ilkley to this percentage.
		5. The change in Burley’s designation to Local Growth Centre has also reduced the proportion of development on previous developed land from 35% to 15% (MM96 paragraph 12 below).	70	This is not correct as the numbers within the policy do not apply to individual settlements but to groups of settlements. Even if those targets had applied to individual settlements the 15% figure would have been more appropriate to Burley given the lack of available and deliverable previous developed sites. It should also be pointed out that the Council has made it clear that the figures within Policy HO6 are not requirements but targets.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM96 (Cont.)		6. The proposed modifications are considered an improvement upon Policy HO6 (MM96) and the supporting text (MM97 and MM98) as they are clear that the percentages are targets rather than requirements. These proposed modifications do not, however, overcome our fundamental concerns with the policy and supporting text - the fact that the Council’s own evidence does not indicate that the targets are achievable and as such the policy is not justified. The plan wide 50% requirement would need a previously developed land supply of at least 21,044 units, approximately 3,000 more than identified.	78	The Council does not agree. The policy indicates a target of 50% of new homes to be delivered on previously developed land not allocated on previously developed land. The SHLAA land supply together with future windfall development which tend to be focused on brown field sites should ensure that the target is met.
		7. The percentages should be adjusted to take account of the physical possibility of providing such numbers. 25% is suggested for both the service centres and growth centres (subject to checking the practicality of applying at the settlements concerned)	102	Firstly the percentages quoted within the modified policy HO6 are not requirements, but targets. Secondly they already reflect a robust analysis of the available, deliverable and developable land supply across the district. Moreover the targets do not apply to individual settlements but to the groups of settlements specified.
		8. The proposed main modifications to this Policy fail to address our previous overriding comments that reference to prioritising brownfield sites is contrary to the NPPF which states that brownfield development should be encouraged. Notwithstanding this point, we welcome the deletion of the brownfield targets being ‘minimum’.	113	This is not a new issue and the Council has responded to the points raised in previous document SD009 and during the initial Examination hearings.
		9. This change will render the PDL targets ineffective. Removing ‘minima’ opens up a semantic interpretation of the targets as maxima, therefore sending out entirely the wrong message about the importance of re-using PDL.	114	The Council disagrees. The policy still states that the Council will give priority to the development of previously developed land and buildings. The overriding need however is to ensure that the plan delivers the homes required by the district’s expanding population.
MM96 & MM97	Policy HO6 Paragraph 5.3.84	1. Removal of the words ‘minimum’ and ‘at least’ weakens the policy and is incompatible with the Council’s own statement within the policy of ‘achieving the maximum possible overall proportion on previously developed	69, 102	The comments and arguments are incorrect and misunderstand the policy. There is no inconsistency or conflict. Targets for PDL have to be based on the evidence of the nature of

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		land’		<p>the deliverable and developable land supply set out in the SHLAA. The maximum possible in any given areas will depend on that reality.</p> <p>The objector also makes reference to the fact that the policy requires 35% of housing in Addingham to be on PDL. To be clear, and this is specially referred to in para 5.3.90 of the Core strategy, the 35% target refers to the group of Local Service Centres as a whole. The target does not apply specifically to development in Addingham.</p>
MM98	Paragraph 5.3.88	1. Support the changes, sound and consistent with NPPF	40, 41, 47	Support noted.
MM99	Policy HO8 Paragraph 5.3.116	1. Support regarding being given to the viability of housing mix proposed	34 109	Support noted.
		2. The insertion of a reference to viability within supporting paragraph 5.3.116 is supported. These will ensure that the plan is more flexible and responsive to local market conditions. It is, however, considered that it would also be beneficial to include the viability clause into Policy HO8 to provide consistency and certainty.	78	Comment of support noted. The council do not agree that the viability clause needs to be inserted in Policy HO8 as the supporting text makes clear that viability should be a consideration in achieving an appropriate housing mix.
MM100	Policy HO9	1. Agree reference should be made to building regulations rather than code for sustainable homes	34 78 113 109	Support noted

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		<p>2. Object to changes to Policy HO9 where it now says <i>that “larger housing sites should include a proportion of new homes which are designed to be accessible and easily adaptable.....”</i></p> <p>There is no justification why this policy approach should only apply to larger housing sites.</p> <p>Furthermore it should be an aspiration policy rather than a requirement. Not all large housing sites will necessarily require provision and sometimes it may not be feasible due to market conditions or viability. Therefore not every large housing site can commit to this. It is considered that part C of the policy should be deleted.</p>	65	<p>The council consider that the policy as proposed to be modified is justified. As set out in the council’s response related to the Examination hearings PS/F069 (paras 4.1 to 4.13), the council consider the requirement justified based on robust evidence in Strategic Housing Market Assessment (SHMA) (EB050) and SHMA Update 2013 (EB/052) in accordance with NPPF paragraph 159, and the District’s Housing Strategy (PS/B001b(vii)) and Housing Strategy for the Over 50’s (PS/B001b(ix)).</p> <p>The policy approach is considered consistent with national planning policy in relation to housing mix and inclusive design as set out in NPPF paragraphs 50 and 57 and the latest guidance in the NPPG.</p> <p>With regards to viability the council consider the policy requirement is justified in viability terms. As set out in the response related to the Examination hearings PS/F068 (paragraphs 4.10 and 4.11) the council has had regard to the Local Plan Viability Assessment, in accordance with NPPF paragraphs 173 and 174. In addition the requirement is subject to feasibility and viability to ensure the policy does not impact on housing delivery in accordance with recommendations in the Local Plan Viability Assessment. The supporting text to Policy HO8 makes it clear that in considering Criteria C regard will be had to local need and the viability and feasibility of delivering accessible homes on a particular site.</p> <p>Therefore the council disagree the policy should be deleted as suggested by the objector.</p>
--	--	--	----	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

	3.	<p>Object to Part C of the policy which refers to the need for larger sites to include a proportion of housing which are designed to be accessible and easily adaptable.</p> <p>Support for the need for accessible homes but consider the Council's position contrary to the ministerial statement and the NPPG, both of which are clear that such requirements must be set within a local plan and the evidence appropriately examined. The Council cannot introduce a policy requirement through a 'Design Guide' which will not be subject to independent examination. This would not only be contrary to the PPG, but would also go beyond the remit of a 'Design Guide' as it would essentially be introducing new policy requirement which will inevitably impact upon viability.</p> <p>The NPPG (ID 56-007) identifies which criteria must be considered through the examination process. The PPG also advises plans should provide targets (ID 56-008). The Council (MM105) clearly indicate that additional work is required to justify the optional standard and as such cannot currently justify the introduction of such a requirement.</p> <p>The HBF recommends that the policy and supporting text be further modified to simply indicate the Council will encourage and support the provision of dwellings which exceed the national minimum accessibility standards. If the Council can supply suitable evidence to justify the introduction of the optional accessibility standards at a later date such a requirement could form part of the examination of the forthcoming Allocations document.</p>	78 113	<p>The council consider that the policy as proposed to be modified is justified. As set out in the council's response related to the Examination hearings PS/F069 (paras 4.1 to 4.13), the council consider the requirement justified based on robust evidence in Strategic Housing Market Assessment (SHMA) (EB050) and SHMA Update 2013 (EB/052) in accordance with NPPF paragraph 159, and the District's Housing Strategy (PS/B001b (vii)) and Housing Strategy for the Over 50's (PS/B001b (ix)).</p> <p>The policy approach is considered consistent with national planning policy in relation to housing mix and inclusive design as set out in NPPF paragraphs 50 and 57 and the latest guidance in the NPPG.</p> <p>In regards to viability the council consider the policy requirement is justified in viability terms. As set out in the response related to the EIP hearings PS/F068 (paragraphs 4.10 and 4.11) the council has had regard to the Local Plan Viability Assessment, in accordance with NPPF paragraphs 173 and 174. In addition the requirement is subject to feasibility and viability to ensure the policy does not impact on housing delivery in accordance with recommendations in the Local Plan Viability Assessment. The supporting text to Policy HO8 makes it clear that in considering Criteria C regard will be had to local need and the viability and feasibility of delivering accessible homes on a particular site.</p> <p>The supporting text is clear that the Housing Design Guide will only be used to provide further guidance to Policy HO8 in advance of</p>
--	----	--	-----------	--

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				<p>any adopted Policy in the Local Plan (allocation DPD), which will include any targets in line with NPPG and will be the subject of independent scrutiny though an examination process.</p> <p>The council do not agree that the policy supporting text should be amended to indicate the council will encourage and support the provision of dwellings which exceed the national minimum accessibility standards as this would not be effective in meeting identified needs of different groups in the District or creating sustainable, inclusive mixed communities as required by NPPF paragraphs 50 and 57..</p>
MM105	Paragraph 5.3.141 & 5.3.142	1. support the introduction of supporting text to policy HO9 which reflects the fact that viability is a factor that must be taken into consideration when determining an appropriate housing mix.	65	Support noted
		<p>2. Object in relation to the proposal for sites of 10 or more dwellings to provide a proportion of accessible homes.</p> <p>The Council has not provided any housing need assessment or other evidence which demonstrates that this should be required. The policy therefore fails the test of justification as regards soundness.</p> <p>There is no reason (or evidence based justification) why developers within Bradford District should be required to exceed the national minimum requirements. Minimum requirements are there for a reason. This draft local policy also seeks to cover legislation controlled within building regulations.</p>	65	<p>The council consider that the policy as proposed to be modified is justified. As set out in the council’s response related to the Examination hearings PS/F069 (paras 4.1 to 4.13), the council consider the requirement justified based on robust evidence in Strategic Housing Market Assessment (SHMA) (EB050) and SHMA Update 2013 (EB/052) in accordance with NPPF paragraph 159, and the District’s Housing Strategy (PS/B001b(vii)) and Housing Strategy for the Over 50’s (PS/B001b(ix)).</p> <p>The policy approach is considered consistent with national planning policy in relation to housing mix and inclusive design as set out in</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		<p>Criteria C should be removed from the policy as this can be adequately dealt with via building regulations and the inclusion of an unjustified locally specific policy such as this will only serve to constrain house building in the plan-area, where the scale of development and viability challenges are already significant.</p>	<p>NPPF paragraphs 50 and 57 and the latest guidance in the NPPG.</p> <p>The latest NPPG states that Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access (Paragraph: 003 Reference ID: 56-003-20150327).</p> <p>The supporting text to policy HO9 also refers to the national standards for access. This is in line with the latest NPPG (Paragraph: 009 Reference ID: 56-009-20150327.)</p> <p>In regards to viability and delivery, the council consider the policy requirement is justified in viability terms. As set out in the response PS/F068 (paragraphs 4.10 and 4.11) the council has had regard to the Local Plan Viability Assessment, in accordance with NPPF paragraphs 173 and 174. In addition the requirement is subject to feasibility and viability to ensure the policy does not impact on housing delivery in accordance with recommendations in the Local Plan Viability Assessment. The supporting text to Policy HO8 makes it clear that in considering Criteria C regard will be had to local need and the viability and feasibility of delivering accessible homes on a particular site.</p> <p>Therefore the council disagree the policy should be deleted.</p>
--	--	---	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		<p>3. Object to Part C of the policy which refers to the need for larger sites to include a proportion of housing which are designed to be accessible and easily adaptable.</p> <p>The HBF supports the need for accessible homes but consider the Council’s position contrary to the ministerial statement and the NPPG, both of which are clear that such requirements must be set within a local plan and the evidence appropriately examined. The Council cannot introduce a policy requirement through a ‘Design Guide’ which will not be subject to independent examination. This would not only be contrary to the PPG, but would also go beyond the remit of a ‘Design Guide’ as it would essentially be introducing new policy requirement which will inevitably impact upon viability.</p> <p>The NPPG (ID 56-007) identifies which criteria must be considered through the examination process. The PPG also advises plans should provide targets (ID 56-008). The Council (MM105) clearly indicate that additional work is required to justify the optional standard and as such cannot currently justify the introduction of such a requirement.</p> <p>The HBF recommends that the policy and supporting text be further modified to simply indicate the Council will encourage and support the provision of dwellings which exceed the national minimum accessibility standards. If the Council can supply suitable evidence to justify the introduction of the optional accessibility standards at a later date such a requirement could form part of the examination of the forthcoming Allocations document.</p>	<p>78 113</p>	<p>The council consider that the policy as proposed to be modified is justified. As set out in the council’s response related to the Examination hearings PS/F069 (paras 4.1 to 4.13), the council consider the requirement justified based on robust evidence in Strategic Housing Market Assessment (SHMA) (EB050) and SHMA Update 2013 (EB/052) in accordance with NPPF paragraph 159, and the District’s Housing Strategy (PS/B001b(vii)) and Housing Strategy for the Over 50’s (PS/B001b(ix)).</p> <p>The policy approach is considered consistent with national planning policy in relation to housing mix and inclusive design as set out in NPPF paragraphs 50 and 57 and the latest guidance in the NPPG.</p> <p>In regards to viability the council consider the policy requirement is justified in viability terms. As set out in the response related to the EIP hearings PS/F068 (paragraphs 4.10 and 4.11) the council has had regard to the Local Plan Viability Assessment, in accordance with NPPF paragraphs 173 and 174. In addition the requirement is subject to feasibility and viability to ensure the policy does not impact on housing delivery in accordance with recommendations in the Local Plan Viability Assessment. The supporting text to Policy HO8 makes it clear that in considering Criteria C regard will be had to local need and the viability and feasibility of delivering accessible homes on a particular site.</p> <p>The supporting text is clear that the Housing Design Guide will only be used to provide further guidance to Policy HO8 in advance of</p>
--	--	--	-------------------	--

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				<p>any adopted Policy in the Local Plan (allocation DPD), which will include any targets in line with NPPG and will be the subject of independent scrutiny through an examination process.</p> <p>The council do not agree that the policy supporting text should be amended to indicate the council will encourage and support the provision of dwellings which exceed the national minimum accessibility standards as this would not be effective in meeting identified needs of different groups in the District or creating sustainable, inclusive mixed communities as required by NPPF paragraphs 50 and 57.</p>
MM106	Paragraph 5.3.143	1. Support the deletion of the Council’s proposed space standards however the new and amended paragraphs infer the use of the new optional national space standard. The Council currently does not have the evidence to justify the introduction of this standard.	78 113	The Modification (MM106) does not refer to the use of the optional national space standard. It sets out that context for why the provision of sufficient living space within new homes is an important element of good housing design and provides further clarification of suitable space standards under Criteria E. This is in line with NPPF paragraph 58 which states Local plans should develop robust and comprehensive policies that set out the quality of development that will be expected in the District. The council consider a policy referring to suitable space standards in homes is considered justified in terms of housing need as set out in the council’s response related to the Examination hearings PS/F069 (paras 4.1 to 4.13).
MM107	Paragraph 5.3.144	1. National space standards requires careful consideration.	34	Noted. The council agree this issue requires careful consideration and therefore intend to undertake further detailed work in regards to adopting the national space standard in the District, in accordance with the latest National

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				Planning Practice Guidance.
		<p>2. Object to this main modification. The Council has not undertaken the necessary evidence work to introduce new space standards.</p> <p>NPPG “Housing- Optional Technical Standards /Internal space standards” Paragraph 020 Reference ID: 56-020-20150327 considers that:</p> <p><i>“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies.”</i></p> <p>Councils must undertake necessary work on the need for space standards; the viability of introducing the impact of space standards; and the timing of the introduction of standards, in order to prevent any adverse impact upon delivery.</p> <p>The Council is proposing a policy which has not been justified or viability tested. Reference to national space standards should be removed from the Core Strategy otherwise it will make the plan unsound.</p>	65	<p>The council consider the modification is justified. In terms of housing need. As set out in the council’s response related to the Examination hearings PS/F069 (paras 5.7 to 5.9), the council therefore consider that the housing quality Policy H09 should including the consideration of providing suitable space standards in line with NPPF paragraph 50.</p> <p>The latest NPPG (Paragraph: 019 Reference ID: 56-019-20150327) states that “Where a local planning authority wishes to require an internal space standard, they should only do so by reference in their Local Plan to the Nationally Described Space Standard.”</p> <p>The modification sets out how the council will consider space standards in regards to planning applications and provides the strategic policy hook for stating that the council wishes to require an internal space standard with reference to the Nationally described space standard line with the latest NPPG. The supporting text makes clear that under Policy HO9 the national space standard and is not a requirement. However it will be used as a benchmark which will allow particularly small homes to be identified and used to assess if a scheme provides suitable internal space standards. Schemes below the national space standard the applicant will be required to justify why the standards cannot be achieved.</p> <p>The council recognise that further detailed work will need to be undertaken in advance of</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

				<p>any policy requiring the nationally described space standard in the Local plan; particularly in regards to the impact on viability, affordability and the timing of introducing a policy as set out in the NPPG.</p> <p>Therefore the modification sets out that 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.</p> <p>The council therefore consider the reference to the national space standard is justified and consistent with national policy and disagree the reference should be removed.</p>
		<p>3. Part E of Policy HO9 refers to internal space standards. The proposed main modification suggests the inclusion of an additional paragraph after 5.3.143 which seeks to apply the national space standard. The amendments to existing paragraph 5.3.144 indicate that if developments are below the national space standard the onus will be upon the developer to identify why the standard cannot be achieved, as discussed at the hearing sessions and within our statements this could have a significant impact upon viability within Bradford.</p> <p>Therefore the proposed paragraph is effectively seeking to introduce the national space standard.</p> <p>The PPG (ID 56-020) clearly indicates the introduction of the internal space should be justified by appropriate evidence and examined through a local plan. The evidence includes the impact upon viability and affordability. The final paragraph of MM107 clearly identifies that the Council currently does not have the evidence to justify the introduction of the standard. It</p>	<p>78 113</p>	<p>The council consider the modification is justified. In terms of housing need. As set out in the council’s response related to the Examination hearings PS/F069 (paras 5.7 to 5.9), the council therefore consider that the housing quality Policy H09 should including the consideration of providing suitable space standards in line with NPPF paragraph 50.</p> <p>The latest NPPG (Paragraph: 019 Reference ID: 56-019-20150327) states that “Where a local planning authority wishes to require an internal space standard, they should only do so by reference in their Local Plan to the Nationally Described Space Standard.”</p> <p>The modification sets out how the council will consider space standards in regards to planning applications and provides the strategic policy hook for stating that the council wishes to require an internal space standard</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		<p>therefore should not be placing the onus upon developers to identify why the standard cannot be met.</p> <p>Given additional work is required to justify the introduction of the national internal space standard it is recommended that reference to the standard be removed from the supporting text. Furthermore Part E of the policy should either be deleted or amended to remove reference to internal space standards to ensure that unjustified requirements are not placed upon developments.</p> <p>If the Council can provide adequate justifiable evidence to introduce the national minimum space standards in the future this could be examined within the forthcoming Allocations document.</p>	<p>with reference to the Nationally described space standard line with the latest NPPG. The supporting text makes clear that under Policy HO9 the national space standard and is not a requirement. However it will be used as a benchmark which will allow particularly small homes to be identified and used to assess if a scheme provides suitable internal space standards. Schemes below the national space standard the applicant will be required to justify why the standards cannot be achieved.</p> <p>The council recognise that further detailed work will need to be undertaken in advance of any policy requiring the nationally described space standard in the Local plan; particularly in regards to the impact on viability, affordability and the timing of introducing a policy as set out in the NPPG.</p> <p>Therefore the modification sets out that 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.</p> <p>The council therefore consider the reference to the national space standard is justified and consistent with national policy and disagree the reference should be removed.</p>
--	--	---	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

MM108	Policy HO11	<p>1. Other “specialist” housing should be added to “affordable housing”. Welcome and support the proposed for affordable housing target in Wharfedale of 30%, but would advocate that other housing needs should be included and considered alongside that particular need.</p> <p>Burley in Wharfedale Parish Council have done research into local needs and this would suggest that there is not an overwhelming LOCAL need for affordable housing but there is a need for homes for the elderly. In such a case the provision of alternative special housing could replace the affordable housing provision.</p>	16	<p>This representation does not relate to proposed modification put forward in MM108.</p> <p>The council are required under NPPF paragraph to 47 meet the full needs for market and affordable housing. The NPPF provides the definition of affordable housing. This does not include specialist housing provision. The council therefore do not consider specialist housing should be added to affordable housing as this would be inconsistent with national planning policy.</p> <p>The council has assessed the need for housing, including affordable housing through the SHMA in accordance with NPPF paragraph 159. Core Strategy Policy HO8 addresses the issue of securing an appropriate housing mix on site, including the provision of specialist housing products.</p>
		<p>2. The modifications do not seek to overcome our objections to the policy targets and thresholds which are not considered to be consistent with the Council’s own evidence. Our reasoning for these conclusions are set out within our comments upon the submission version of the plan and our written and oral comments upon Matter 4F of the examination hearing sessions. All of these are before the Council and the Inspector and as such are not repeated here</p>	78	<p>The council consider he targets and thresholds in Policy HO11 fully justified, effective and consistent with national planning policy in regards to meeting affordable housing need and consideration of economic viability as set out in PS/E004f - Council Further Statement Matter 4F Affordable Housing and oral comments upon Matter 4F of the examination hearing sessions.</p>
		<p>3. We have no objections to the proposed modifications to Policy HO11 and the supporting paragraphs. We support the thresholds “developments of 15 units or more and 5 units or more in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden, and Cottingley) and the proportions (up to 30% in</p>	113	<p>Support noted.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		Wharfedale; up to 20% in towns, suburbs and villages; and up to 15% in inner Bradford and Keighley), given they are maxima and subject to viability testing.		
MM109	Paragraphs 5.3.173 7 5.3.174	1. The modifications do not seek to overcome our objections to the policy targets and thresholds which are not considered to be consistent with the Council’s own evidence. Our reasoning for these conclusions are set out within our comments upon the submission version of the plan and our written and oral comments upon Matter 4F of the examination hearing sessions. All of these are before the Council and the Inspector and as such are not repeated here	78	The council consider the targets and thresholds in Policy HO11 fully justified, effective and consistent with national planning policy in regards to meeting affordable housing need and consideration of economic viability as set out in PS/E004f - Council Further Statement Matter 4F Affordable Housing and oral comments upon Matter 4F of the examination hearing sessions.
		2. We have no objections to the proposed modifications to Policy HO11 and the supporting paragraphs. We support the thresholds “developments of 15 units or more and 5 units or more in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden, and Cottingley) and the proportions (up to 30% in Wharfedale; up to 20% in towns, suburbs and villages; and up to 15% in inner Bradford and Keighley), given they are maxima and subject to viability testing.	113	Support noted.
MM110	Paragraphs 5.3.179 to 5.3.189	1. Support the modification	44	Support welcomed and noted.
		2. The multi-agency Gypsy and Traveller Working Group supports the identified need for additional pitches which will assist a community experiencing poor outcomes in terms of health, education and life expectancy.	83	The comments are noted.
		3. There is a significant need for pitches with families having to be forced to go road side due to an insufficient number of sites and pitches in the district. The fact there are empty pitches on Esholt site should not be used a reason not to provide additional pitches. Many people who have lived on Esholt site for decades have been forced off due	44	The comments are noted

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		to intimidation from a family who are being monitored by the Police and some of family are subject to international arrest warrants.		
		4. While the updated Gypsy and Traveller Accommodation Assessment acknowledges the need to consider any associated livestock (horses, etc.) we would welcome the inclusion of this topic with in the policy/Local Plan to avoid any adverse issues (e.g. highways, trespass, etc.) being overlooked.	8	If necessary such matters can be incorporated within the Allocations DPD.
		5. I support the need for additional pitches but due to the fact I was not interviewed and my needs not taken in to account, the true need is probably much more than 39 pitches.	44	The Council considers the assessment of need to be robust. The calculation of need was not just based on the information gained from households on current managed sites but also from other sources such as unmet need from households in bricks and mortar. It also took the decision not to include any allowance on the supply side of the equation for turnover. Finally the target is expressed as a minimum meaning a higher level of provision could be made in the Allocations DPD if evidence of a higher need arose.
		6. The group feels that the estimated needs for additional pitches might be on the low side in view of the fact that many Travellers will not live in Mary Street site as it is next to a recycling facility and the pitches are regarded by some as not being child friendly and the other local authority run site at Esholt is linked to a family that many families refuse to live near. Many families who lived on Esholt site for decades have moved off due to alleged intimidation from that family. And as a result there are empty pitches on Esholt site.	83	See the response above.
		7. The working group is concerned that the empty pitches on Esholt may be used as a reason to oppose fully addressing the identified needs and revising down the	83	The concerns are noted however the policy approach as stated within the modification is for the Allocations DPD to identify sufficient

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.3 - Housing

		number of pitches required.		sites to ensure that the requirement as set out in Policy H12 is met.
		<p>8. We are however very pleased to see the recommendation MM110 wording in the document that states that “the sites which will be identified in forthcoming DPD’s meet in full 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> <p>We request that the above should also be in relation to the transit sites to ensure that the community can access services during short term stops.</p>	83	The relevant paragraph, para 5.3.180 applies to all sites including transit sites and it is accepted that such sites should be identified in accessible locations although it should be borne in mind that the given the nature of transit sites which often serve families on the move and on route to fairs and family visits means that the locations attributes of a transit site may not always be entirely the same as for sites containing permanent pitches.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

The following summarises the main issues raised in response to the main modifications proposed to the Core Strategy together with the Councils response. Where the issues relate to matters which have already been dealt with as part of the Examination to date this is made clear in the Councils response with reference to where this can be found.

The Main Modifications relate to the document published November 2015 (Document reference PS/G004a)
 Policy and paragraph numbers relate to the Publication Draft Core Strategy as submitted: Submission Document reference SD001

Modification No.	Policy/ Paragraph	Main Issues	Respondent (Ref No.)	Council Response
MM113	Supporting text to Policy EN1 (Protection & improvements in provision of Open Space & Recreational Facilities) Para number?	<p>1. Propose a change to the paragraph deleting reference to mitigation and including a reference to policy SC8. as follows:</p> <p>Policy EN1 (Protection and Improvements in provision of Open Space and Recreational Facilities), by contrast, is a more general policy with wider application covering open space, recreation facilities and local greenspace. Therefore reference, in the supporting text for Policy EN1, to matters concerning the South Pennine Moors SPA / SAC protection must be consistent with the more detailed and specific Policy SC8.</p> <p>The new supporting text proposed by the Council in MM113 is not consistent with the final paragraph of Policy SC8. It is also not consistent with the Council’s MM37. MM37, consistent with Policy SC8, envisages the SPD setting out a financial contribution calculation mechanism, but with the <i>evidence base</i> for the SPD considering the identification and delivery of opportunities for</p>	104	<p>This forms an element in a package of measures agreed with Natural England and the Councils advisers in the context of HRA work, to improve the integration of HRA issues within the core strategy. It is not considered necessary or appropriate to directly link one policy with another either through the policy text or accompanying text, as an individual policy could be subject to future review or challenge. An SPD could relate to and apply elements in a number of policies in the core strategy, not solely SC8.</p> <p>A link is being made to the evidence base which will underpin future work on open space and green infrastructure. While this evidence base would be likely to have an influence on the SPD, it would also influence the Allocations DPD and assessments of natural greenspace provision at a</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

		additional greenspace etc. The objectors proposed change achieves the consistency required.		settlement level. An SPD cannot identify or allocate land for a particular purpose. The Council do not consider the proposed change is either appropriate or necessary.
		2. Natural England supports the modification made by the Council.	24	Noted.
		3. The reference to a future SPD being produced to identify contributions and mitigation which could potentially work is noted.	34	The Council notes the comment and support and intends to progress work on the future SPD.
MM114	Policy EN1 (Protection & improvements in provision of Open Space & Recreational Facilities)	<p>1. Propose a change to Criterion C which removes reference to provision of new recreational open space and add cross reference to policy SC8.</p> <p>Policy EN1 (Protection and Improvements in provision of Open Space and Recreational Facilities), is a more general policy with wider application covering open space, recreation facilities and local greenspace. Therefore reference in Policy EN1 to matters concerning the South Pennine Moors SPA / SAC protection must be consistent with the more detailed and specific Policy SC8.</p> <p>Policy SC8 sets out the particular methods envisaged to address any adverse impacts on the South Pennine Moors SPA / SAC through increased recreation. The methods</p>	104	<p>This forms an element in a range of measures agreed with Natural England in the context of HRA work, to improve the integration of HRA issues within the core strategy. It is not considered necessary or appropriate to directly link one policy with another either through the policy text or accompanying text, as an individual policy could be subject to future review or challenge.</p> <p>The text of the modification relates the issue of mitigating recreational pressure back to the primary subject matter of this policy which is provision of open space. The introduction of an isolated reference</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

		<p>envisaged by Policy SC8 are by way of developer financial contribution or provision by the developer of on-site or off-site mitigation / other appropriate measures. Policy EN1 should therefore either track exactly the wording of Policy SC8 “<i>In Zoneand review of measures</i>”; or simply cross refer to Policy SC8. The objectors change simply cross refers to Policy SC8 to ensure consistency.</p> <p>Natural England supports the modification made by the Council.</p>		<p>to SC8 in a policy relating to a different topic would be out of context, misleading and without explanation.</p> <p>The Council do not consider the proposed change is either appropriate or necessary.</p>
MM115	Policy EN2 (Biodiversity & Geodiversity) Paragraph 5.4.32	<p>1. Natural England welcomes the further clarification provided by the additional text proposed which reflects the avoid, mitigate, compensate hierarchy set out in the NPPF.</p>	24	Noted
		<p>2. Support representations made by Natural England but reject any dilution of the policy restrictions relating to biodiversity and geological conservation. Objector wish to see an amendment which removes all or any modification diluting conservation policy.</p>	26, 55	<p>In relation to the specific amendments identified, for MM115, Natural England has welcomed the further clarification provided by the additional text proposed which reflects the avoid, mitigate, compensate hierarchy set out in the NPPF. This modification sought to set the position in relation to compensatory measures, promoted by CEG, in its appropriate context.</p> <p>In response to the issue that the modifications dilute the policy relating to biodiversity and geodiversity, although a number of</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

MM15 (Cont.)				<p>amendments have been accepted by both the Council and Natural England, others have been rejected on the basis of potential to undermine the policy. The Council therefore considers that it has taken a balanced view. It also needs to be noted that the Council has rejected the further amendment proposed to MM120.</p>
		<p>3. New homes too close to the Moor will damage the Moors eco system.</p>	77	<p>In relation to the specific amendments identified, for MM115, Natural England has welcomed the further clarification provided by the additional text proposed which reflects the avoid, mitigate, compensate hierarchy set out in the NPPF.</p> <p>The specific amendment of MM117 was requested by Natural England, is supported by Natural England and reflects the policy set out in the NPPF for the protection of Sites of Special Scientific Interest.</p> <p>In response to the issue that the modifications dilute the policy relating to biodiversity and geodiversity, although a number of amendments have been accepted by both the Council and Natural England, others have been rejected on the basis of potential to undermine the policy position. The</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

MM15 (Cont.)				<p>Council therefore considers that it has taken a balanced view. It also needs to be noted that the Council has rejected the further amendment proposed to MM120.</p> <p>The Council has confidence in the HRA Report of November 2015, which is on the Councils website and has been produced by consultants Urban Edge who are experienced in carrying out HRA work. Natural England have agreed with the assessment conclusions, provided that all mitigations measures are appropriately developed and secured. The HRA does identify a need for further survey and assessment work to inform the Allocations DPD.</p>
MM116	Policy EN2 (Biodiversity & Geodiversity) Criterion A	1. Natural England supports the modification.	24	Noted
MM117	Policy EN2 (Biodiversity & Geodiversity) Policy wording (new criterion B)	1. Natural England welcomes the new criterion B which reflects the policy set out in the NPPF for the protection of Sites of Special Scientific Interest.	24	Noted.
		2 Support representations made by Natural England but reject any dilution of the policy restrictions relating to biodiversity and geological conservation. They wish to see an	26, 55	The specific amendment of MM117 was requested by Natural England, is supported by Natural England and reflects the policy set out in the

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

		amendment which removes all or any modification diluting conservation policy.		<p>NPPF for the protection of Sites of Special Scientific Interest.</p> <p>In response to the issue that the modifications dilute the policy relating to biodiversity and geodiversity, although a number of amendments put forward have been accepted by both the Council and Natural England, others have been rejected on the basis of potential to undermine the policy position. It also needs to be noted that the Council has rejected the further amendment proposed to MM120.</p>
		<p>3. New homes too close to the Moor will damage the Moors eco system.</p>	77	<p>In relation to the specific amendments identified, for MM115, Natural England has welcomed the further clarification provided by the additional text proposed which reflects the avoid, mitigate, compensate hierarchy set out in the NPPF.</p> <p>The specific amendment of MM117 was requested by Natural England, is supported by Natural England and reflects the policy set out in the NPPF for the protection of Sites of Special Scientific Interest.</p> <p>In response to the issue that the modifications dilute the policy relating to biodiversity and</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

				<p>geodiversity, although a number of amendments put forward have been accepted by both the Council and Natural England, others have been rejected on the basis of potential to undermine the policy. The Council therefore considers that it has taken a balanced view. It also needs to be noted that the Council has rejected the further amendment proposed to MM120.</p> <p>The Council has confidence in the HRA Report of November 2015, which is available on the Councils website and has been produced by consultants Urban Edge who are experienced in carrying out HRA work. Natural England have agreed with the assessment conclusions, provided that all mitigations measures are appropriately developed and secured. The HRA does identify a need for further survey and assessment work to inform the Allocations DPD.</p>
MM118	Policy EN2 (Biodiversity & Geodiversity) (new criterion C)	1. Natural England supports the modifications made by the Council.	24	Noted.
MM120	Policy EN2 (Biodiversity & Geodiversity)	1. Concern raised with the proposed modification:	104	In order to establish coherent ecological networks that are

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

	E Enhancement	<p><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 unless it can clearly be demonstrated that there are reasons for the proposal which outweigh the need to safeguard the substantive nature conservation value of the features of interest.”</u></p> <p>Amend criterion reference to reflect new Criterion B (under MM118) and amend text follows</p> <p>Paragraph 113 of the NPPF requires criteria based polices reflecting the hierarchy of sites.</p> <p>All four of paragraphs A, B, C and D of Policy EN2 reflect the need in certain circumstances for development interests to override natural environment interests: It is odd therefore that Paragraph E, which deals with “Enhancement”, perversely does not recognise the concept of development “overriding” natural environment protection.</p> <p>Paragraph E states that in cases of serious fragmentation of habitats, wildlife corridors or significant adverse effects on biodiversity networks or connectivity development will always be resisted.</p>		<p>resilient to current and future pressures it is necessary to ensure that proposals for development which would cause serious fragmentation or have a significantly adverse impact on networks or connectivity can be resisted. Establishing ecological networks is strongly supported in the NPPF, in guidance, in a range of publications and has been supported through the consultation process of preparing the core strategy by a range of stakeholder groups and continues to be supported. The modification reflects paragraph 109 in the NPPF, bullet point 3. Sites which are, or could be part of a coherent ecological network can have greater value overall than individual sites</p>
--	---------------	--	--	---

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

			The objectors s proposed change ensures consistency between paragraph E of Policy EN2 and paragraph 113 NPPF; as well as the earlier paragraphs A-D of Policy EN2 .		
MM120 (Cont.)	Policy EN2 As above	2.	Natural England supports the modification made by the Council.	24	Noted.
		3.	Fully support that ‘plans, policies and proposals should contribute positively towards the overall enhancement of the District’s biodiversity resource’. They do not accept that these objectives can be satisfied in Burley in the context of the level of development and the status as a local growth centre.	70	Support for the policy is noted. See related responses which address the scale of development in Burley as well as the settlement Hierarchy.
		4.	Some emphasis is put on supporting this modification to the text of EN2, in particular the last sentence as proposed by the Council. General support for the additional paragraph aimed at protecting biodiversity networks and wildlife corridors.	100, 62	Noted
MM123	Policy EN6 Energy – Supporting text paragraph 5.4.126		Support for modification.	17	Noted
MM124	Policy EN6 Energy – Supporting text paragraph 5.4.127	1.	Natural England welcomes the inclusion of reference to the West Yorkshire Ecology guidance on small wind turbines and the addition of the landscape character areas as a tool.	24	Noted

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

MM127 & 128	EN7 Flood Risk – supporting text paragraph 5.4.132 & 5.4.143	<p>1. A number of groups support the modifications proposed by the Council on the basis that they enhance flood risk protection. The inclusion of all forms of flooding including those associated with groundwater, overwhelmed sewers and drainage systems in assessing sites for future development is supported. Events during the winter of 2015-16 have clearly shown that several sites in Ilkley and elsewhere in Wharfedale identified in the SHLAA are unsuitable for development due to groundwater flooding and inadequate infrastructure.</p>	170, 54, 55	The Council welcomes the support for the modifications. Comments are noted and further assessment of flood risk associated with potential sites for development will take place when preparing the Allocations DPD. Groundwater flooding and infrastructure can be assessed at this stage.
MM127 & 128	As above	<p>2. The Environment Agency note the changes and have no objection to the proposed modifications.</p>	62	Noted.
MM127 & 128	As above	<p>3. Sub-issue a) Two groups consider that a full review and assessment of flood risk and flood defences is needed in Wharfedale following the 2015 adverse weather conditions and flooding. It is considered that climate change predictions indicate such weather, (ie increased frequency and intensity of storms), is expected to be a regular event in future years. One group raises the above issues but supports the modifications made, while the other objects on the grounds that they are unlikely to be effective.</p>	170, 69, 55	Clearly review work will take place in response to the flooding of December 2015, both in relation to the immediate response and in relation to future planning, although it will take time for lessons that can be learnt from the event to be assimilated into guidance. While surface water mapping is available, local issues remain which require site by site assessment. This is a strategic plan and further assessment of flood risk, in relation to groundwater flooding, infrastructure and surface water, associated with potential sites for

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

				<p>development will take place when preparing the Allocations DPD.</p> <p>The approach to climate change is identified in Strategic Core Policy 2 and through taking into account areas within flood zone 2 as areas of higher risk. The Council considers that the overall approach would therefore be effective.</p>
MM127 & 128	As above	4. Sub-issue b) In relation to Wharfedale, flooding due to run-off and re-emergence of local springs requires analysis to mitigate landslides on steep ground, standing water on highways, damage to land and infrastructure and ice on residential roads.	170	See response to sub-issue a). The key issues relating to the River Wharfe, local water courses and flood risk are identified in paragraph 5.4.139 in the core strategy.
MM127 & 128	As above	5. Sub-issue c) Consideration should also be given to extending the Wharfedale flood plain.	170	The Flood Risk Maps produced by the Environment Agency identify high risk zones within the District. The Council has provided an indication of the proportion of SHLAA sites that lie within the high risk zones in order to estimate the proportion of land overall that could be subject to flood risk constraints see SFRA (EB/048) and Sequential testing paper .
MM127 & 128	As above	6. Sub-issue d) New design policies should be introduced, perhaps to DS5 to safeguard buildings and mitigate against flood damage.	170	Modifications to DS5 have not currently been proposed by the Council. Specific building design requirements in relation to a particular site or area could be

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

				addressed in lower tier plans.
MM127 & 128	As above	<p>7. Groups support the modifications that have been proposed to the supporting text, but still consider that unless the actual policy wording of EN7 is changed to reflect this, the wording does not go far enough to protect communities and take into account flood risk from all sources including groundwater flooding and is less likely to be effective. The current Policy EN7 only requires storage of flood water in Flood Risk Zones 2 and 3a. The Groups key concerns are particular problems relating to groundwater flooding caused by conditions in Menston, but which may extend to other areas and that the development of an individual site should not increase floodrisk in neighbouring areas. These issues have not been taken into account adequately.</p> <p>Policy EN7 – please amend as follows: A1 Integrate sequential testing, including flood risk assessment from all water sources into all levels of plan-making.</p> <p>A2 – Require space for the storage of flood water from all sources. (delete ‘within Zones 2 and 3a)</p> <p>A7 – Require that all sources of flooding are addressed, that development proposals will only be acceptable where they do not increase flood risk elsewhere and that any need for improvements in drainage infrastructure are completed prior to</p>	75, 71, 77	<p>The modification proposed by the Council is considered to be sufficiently effective to ensure that all sources of flood risk, including groundwater can be taken into account. The supporting text provides further detail about how sequential testing would be carried out in relation to choice of sites.</p> <p>In relation to requiring space for the storage of water outside of Flood Risk Zones 2 and 3ai, it is considered that this can be addressed by a combination of EN7 policy elements: 5 – relating to beck corridors, 7 – requiring that all sources of flooding are addressed, 9 - relating to SUDS provision and 10 – using flood risk data to inform decisions made about green infrastructure, in addition to the accompanying text.</p> <p>Element 7 of EN7 already requires: ‘that all sources of flooding are addressed, that development proposals will only be acceptable where they do not increase flood risk elsewhere and that any need for improvements in drainage infrastructure is taken into account.’</p> <p>The Council therefore notes the</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

		<p>commencement of any development, including taking into account 100 year occurrences and climate change</p> <p>The reason put forward is to comply with the NPPF technical guidance, to ensure that all sources of flooding are addressed and to ensure that the plan is legally compliant.</p>		<p>support for the modifications and considers that the issues have been addressed in the existing policy and the modifications put forward.</p>
MM127	Supporting text to EN7 paragraph 5.4.132	<p>1. Sub-issue e) Conditions in the local river catchments of the Rivers Wharfe and Aire have had an impact on flooding further downstream. Leeds City Council are quoted as publicly stating that catchment measures should be adopted upstream of Leeds to reduce flood risk.</p>	69	<p>Policy EN7 and accompanying text have already identified the need to safeguard potential to increase flood storage provision in relation to the Rivers Aire and Wharfe corridors. Catchment measures could be considered as an element of future work in relation to flood risk.</p>
MM127	As above	<p>2. Sub-issue f) The recent flooding has demonstrated the total ineffectiveness of SUDS drainage systems in extreme rainfall events, particularly on sloping ground when systems get completely overwhelmed.</p>	69	<p>It is not possible to comment on individual site related issues. Site by site assessment of the most appropriate means of SUDs is generally needed.</p>
MM127	As above	<p>3. Sub-issue g) A group consider the modification to be unsound. Core Strategy provisions are inadequate and should be put on hold pending the Environment Agency Review of river catchments with respect to flooding. The likely outcome is a considerable reduction in land suitable for development which will then need to be reserved for future ‘local need’ and the plan should be put on hold.</p>	69	<p>It will take some time to review the data from recent flood events. The Flood Risk Maps produced by the Environment Agency identify high risk zones within the District. The Council has provided an indication of the proportion of SHLAA sites that lie within the high risk zones in order to estimate the proportion of land overall that could be subject to flood risk constraints.</p> <p>This is a strategic plan and further assessment of flood risk, in relation</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.4 – Environment

				to groundwater flooding, infrastructure and surface water, associated with potential sites for development will take place when preparing the Allocations DPD. The provisions in EN7 are considered to be adequate.
--	--	--	--	---

Appendix 6 – Summary of Comments Received and Council Response to the Proposed Main Modifications consultation
Section 5.5 – Minerals

The following table summarises the main issues raised in response to the main modifications proposed to the Core Strategy Publication Draft together with the Councils response. Where the issues relate to matters which have already been dealt with as part of the Examination to date this is made clear in the Councils response with reference to where this can be found.

The Proposed Main Modifications relate to the document published November 2015 (Document reference PS/G004a)
 Policy and paragraph numbers relate to the Core Strategy Publication Draft as submitted (Submission Document reference SD001)

Proposed Modification No.	Policy / Paragraph	Main Issue	Respondent	Council's Response
Section 5.5				
MM131	Policy EN9 Criterion A (3)	1. Welcome the clarification provided which is in line with the modified Habitats Regulations Assessment	24	Noted.
		2. Proposed modification is not in line with Policy SC8.	104	See related response under MM53
MM132	Policy EN9 Criterion B (3)	1. Welcome the clarification provided which is in line with the modified Habitats Regulations Assessment	24	Noted.
		2. Proposed modification is not in line with Policy SC8.	104	See related response under MM53
MM135	Policy EN11 Criterion D (1) & D (2)	1. Support for the reference to hydrocarbons throughout the policy.	18	Noted
MM136	Policy EN11 Criterion C	1. Support the deletion of the policy criterion as proposed.	18	Noted.
MM137	Policy EN12 Criterion B (4)	1. Support modification which clarifies the purpose of this Criterion.	9	Noted.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.6 - Waste

The following table summarises the main issues raised in response to the main modifications proposed to the Core Strategy Publication Draft together with the Councils response. Where the issues relate to matters which have already been dealt with as part of the Examination to date this is made clear in the Councils response with reference to where this can be found.

The Proposed Main Modifications relate to the document published November 2015 (Document reference PS/G004a)
 Policy and paragraph numbers relate to the Core Strategy Publication Draft as submitted (Submission Document reference SD001)

Proposed Modification No.	Policy / Paragraph	Main Issue	Respondent	Council’s Response
Section 5.6				
MM139	Paragraph 5.6.8 – 5.6.14	<p>1. We have no objection to the proposed modifications on waste.</p> <p>We note that evidence has been added, including headline waste arisings and capacity gap figures which are backed up by a needs assessment document and a forecast model. Whilst we are not in a position to comment on the accuracy of these, the data sources and methods used are reasonably up to date and appropriate.</p> <p>Agricultural waste is placed at the top of the arisings table WM1. This has potential to cause confusion as most of this waste is organic and is usually dealt with on the farm. Therefore it does not have to be planned for in the same way as commercial waste. This is stated further down the document but perhaps a foot note would help.</p>	62	<p>The Council does not consider this to be a soundness issue and the supporting text clarifies Agricultural waste does not need to be planned for in the same way as commercial waste.</p> <p>No further modification is necessary.</p>

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 5.6 - Waste

MM140	Paragraph 5.6.16	1. Wakefield supports the approach to cross boundary working set out in new paragraph 5.6.16.	81	The Council welcomes Wakefield Council’s support.
MM141	Policy WM1	1. Wakefield Council supports amended policy MW1 and notes the policy commits Bradford to work collaboratively with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management to allow Bradford District to become net self-sufficient. It is noted however that the revised policy recognises that cross-boundary movements will continue, and seeks a collaborative approach with other waste planning authorities to provide a “ network of facilities to deliver waste management” There are some concerns with this approach and perhaps further clarity is needed on how this would be achieved. It is difficult to see how Bradford waste could be planned for and managed in a wider planning context, whether on a County basis or further afield, without direct collaboration with other authorities to provide a joint waste facility.	81	The Council welcomes Wakefield Council’s support. The Council will continue to work closely with neighbouring authorities on strategic waste planning. Further details of collaborative and cross boundary working will be set out in the Waste Management DPD. The Duty Co-operate Statement supporting the Core Strategy sets out the approach to waste.
MM146	Policy WM1	1. Policy WM1: Waste Management – here there should be no separate reference to “important foraging land within the SPA’s zone of influence”	104	See response to MM53 as this issue has been raised throughout a number of policies.

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section 6 – Implementation and Delivery

The following table summarises the main issues raised in response to the main modifications proposed to the Core Strategy Publication Draft together with the Councils response. Where the issues relate to matters which have already been dealt with as part of the Examination to date this is made clear in the Councils response with reference to where this can be found.

The Proposed Main Modifications relate to the document published November 2015 (Document reference PS/G004a)
 Policy and paragraph numbers relate to the Core Strategy Publication Draft as submitted (Submission Document reference SD001)

Proposed Modification No.	Policy / Paragraph	Main Issue	Respondent	Council’s Response
Section 6				
MM147	Paragraph 6.23	1. Welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA)	24	Support noted
		2. General support to the modification.	113	Support noted
MM148	Paragraph 6.26	1. Welcomes the clarification provided which is in line with the modified Habitats Regulations Assessment (HRA)	24	Support noted
		2. General support to the modification.	113	Support noted

Appendix 6 – Proposed Main Modifications – Summary of Main Issues and Council’s Response
Section - Appendices

The following table summarises the main issues raised in response to the main modifications proposed to the Core Strategy Publication Draft together with the Councils response. Where the issues relate to matters which have already been dealt with as part of the Examination to date this is made clear in the Councils response with reference to where this can be found.

The Proposed Main Modifications relate to the document published November 2015 (Document reference PS/G004a)
 Policy and paragraph numbers relate to the Core Strategy Publication Draft as submitted (Submission Document reference SD001)

Proposed Modification No.	Policy / Paragraph	Main Issue	Respondent	Council’s Response
Appendices				
MM152	Paragraphs 1.3 – 1.5 Housing Trajectory	1. We objected to the use of the Liverpool method in our earlier representations.	34	See responses to related housing modifications
		2. The plan seeks to meet the backlog in housing delivery over the full plan period, utilising the ‘Liverpool’ method of delivery. This is contrary to the PPG (ID 3-35)	78	See response to related housing modifications