

## **Bradford District Local Plan**

### **Core Strategy Examination Session Day Seven**

**Matter 6B: SUB AREA POLICIES - Airedale**

**Date: 13<sup>th</sup> March 2015**

**Venue: Victoria Hall, Saltaire**

## Issue 6.4

### Strategic Pattern of Development:

- a. **Is there sufficient justification and evidence to support the broad distribution of development as set out in Part A of the Policy?**
- b. **Is this element of the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**

### Response

1.1 Policy AD1 pulls together the key elements of the development strategy for the respective sub area. This covers the following settlements:

- Keighley
- Bingley
- Silsden
- Steeton With Eastburn
- Baildon
- Cottingley
- East Morton

1.2 The detailed approach to the scale and distribution of housing and economic development are dealt with under the relevant policies namely HO1 – HO3 and EC1 – EC4 and supporting text.

1.3 The individual settlement targets, including those for the settlements within Airedale, have been influenced by a variety of factors and criteria ranging from very strategic ones such as the Plan's Strategic Core Policies, in particular the Settlement Hierarchy, to more specific local factors such as land supply and environmental constraints.

1.4 Even though the final targets are relatively detailed and are settlement specific, the process of deriving those targets has to start off with some strategic building blocks – policy assumptions and goals. The two core strategic building blocks have been the evidence on the drivers of population and household growth which result in the need for new homes and the hierarchy of settlements within the district. The former, the drivers of housing need, as revealed within both the Strategic Housing Market Assessment (SHMA) (EB050 & EB052) and the Housing Requirement Study (EB028) are the expected natural increase (births minus deaths) in the district's population driven by a relatively young age profile and continued international migration. Clearly the main urban areas of the district of Bradford and Keighley exhibit the youngest age structures and have had historic and established patterns of international migration from both commonwealth countries and more recently the EU. This means that there is a strong argument for the overall housing distribution to be focused on the urban areas in particular the Regional City. This also then leads to a comparatively lower level of housing growth being proposed for other settlements including some of those within the Airedale

sub area. The precise degree of concentration and focus of housing growth may be a matter of debate but the need for an urban focus is hopefully beyond reasonable argument.

- 1.5 The second strategic building block for deriving a housing distribution is the settlement hierarchy. The Council's proposed settlement hierarchy is set out in Policy SC4. This again is a key factor since the settlement hierarchy has been determined by reference to the size, role and function of each settlement and the range, and balance of services both within that settlement and accessible to that settlement. Settlements with good transport links, particularly good public transport links feature in higher tiers of that hierarchy. Thus any broad approach to housing distribution which has strong regard to the settlement hierarchy is already pre-disposed to being a sustainable option because the development which does occur will be focused in sustainable locations. Within Airedale the settlement hierarchy approach therefore suggests that the highest housing targets should be located in the Principal Towns of Keighley and Bingley and successively lower targets for the next two tiers with both Steeton with Eastburn and Silsden identified as third tier local growth Centres and Baildon, Cottingley and East Morton identified as fourth tier Local Service Centres.
- 1.6 Therefore at each stage of the preparation of the Core Strategy the Council has attempted to put forward a distribution which follows the strategic principles of a focus on the urban areas and the use of the settlement hierarchy. This has in turn affected the content of the sub area policies.
- 1.7 The precise targets and the levels of development however also have to reflect – and have reflected – a variety of other evidence. Firstly the distribution also has to reflect the available land supply as indicated in the Strategic Housing Land Availability Assessment (SHLAA) (EB049). The SHLAA provides useful guide to the approximate upper limits to potential housing targets (if no other factors needed to be assessed) as it has analysed the extent of deliverable and developable land supply on a settlement by settlement basis. However this is not enough on its own. The nature of that land supply has to be assessed and here again the SHLAA is useful as it provides an indication of the split between green field and previously developed land, between in settlement and edge of settlement options, and the extent of green belt change, if any, which may be required within each settlement. The SHLAA therefore provides both absolute evidence of whether certain targets are deliverable, and provides an indication of where spare capacity might exist if alternative distribution quantum were put forward and also illuminates the environmental implications of a given approach.
- 1.8 Secondly the distribution has also been assessed against information on a range of environmental constraints. The Council's approach within Policies AD1 and Policy HO3 therefore reflects:
  - The results of a district wide Growth Assessment which has confirmed that it will be possible to deliver and manage change to the district's green belt boundaries in a way which still maintain a robust green belt at local and strategic level and which still promotes development in sustainable locations. In many ways this reflects the fact that the district's green belt boundaries have been drawn very tightly into the edges of existing

settlements meaning that there are many green belt locations which are relatively accessible to local services and transport routes;

- The results of a Strategic Flood Risk Assessment and more specifically a sequential flood risk assessment. The latter has shown that in the vast majority of settlements the proposed housing targets can be met entirely within the lowest flood risk zone.
- The results of a Habitats Regulations Assessment (HRA) (SD022)- here the impacts of the analysis have been felt more acutely in some of the Principal Towns and lower order settlements – settlements where potential sites are located within 2.5km of the designated South Pennines Special Protection Area (SPA) and Special Area of Conservation (SAC) and where based on the analysis of the HRA the Council are advocating a precautionary approach to ensure that the loss or degradation of areas outside of the designated sites but yet important to those sites (for example by providing foraging resources) is minimised.

1.9 Thirdly the distribution has taken account of other contextual evidence including:

- Transport and infrastructure – it has been clear from the outset that the level and scale of development required to meet future need will provide challenges and will require significant intervention and investment. While objectors concerns naturally reflect the perceived situation of services and infrastructure in their own areas, services and infrastructure are stretched and in some places at and beyond capacity in many areas across the district. The Council has produced an Local Infrastructure Plan (LIP) (EB044), liaised with infrastructure providers and considers that the Core Strategy rather than creating infrastructure problems, will actually provide the basis to begin to tackle the forthcoming issues by giving certainty to service providers and utility providers of the future level of growth so that they can develop their short and medium term investment plans;
- The need for the distribution to reflect the priority for regeneration and the Council's key focus on areas such as the City Centre, the Canal Road Corridor and the Airedale Corridor (in particular the settlements of Keighley, Bingley and Shipley);
- The need for the distribution to provide homes in lower tier settlements to support local need, maintain their vitality, support local services and therefore community cohesion, and provide affordable housing;
- The need for the distribution to reflect deliverability and viability issues; on a site by site basis the Council's SHLAA has assessed whether there are any site related deliverability constraints such as land ownership, access issues, steep slopes and so on. It has also sought the views of the SHLAA Working Group on how general market conditions in each area might affect the likelihood and the timing of delivery; the Plan has also been informed by a full local plan Viability Assessment (EB046).

1.10 It should be stressed that the interplay between strategic factors and more detailed environmental and land supply factors is different in each settlement. So for example the need to reflect the 2.5km SPA buffer zone affects some settlements and not others, land supply is more of a constraint in some settlements than others, flood risk is more of a constraint in some areas than others and so on. The Council's Housing Background Paper 2 (SD016) has therefore indicated the key factors which have affected the final housing target and also benchmarked that

target against a baseline distribution which reflects only the size of the population within that settlement.

- 1.11 The distribution set out in Policy AD1 is therefore aligned both to the evidence and to other key strategic policies within the plan, in particular SC4 and SC5 which define the settlement hierarchy and broad approach for managing growth.
- 1.12 This element of the policy is therefore effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance.
- 1.13 The approach has been informed by proportionate and up to date evidence in line with NPPF paragraphs 158 to 177 and further relevant guidance in NPPG. Appendix 1 to the Background paper 1 (SD015) sets out an overview of the evidence and how it has been used to inform relevant policies of the plan. Background paper 2 (SD016) sets out further detail on the approach to both the evidence to support the scale of development as well as the distribution of development.
- 1.14 In line with SC4 the distribution of housing and employment growth recognises the role of the Principal Towns of Keighley and Bingley, in terms of existing development, population and services. The settlements of Silsden and Steeton with Eastburn are designated as Local Growth Centres which are considered appropriate and sustainable locations for growth.
- 1.15 Policy EC3 and related Background paper 3 set out the basis for the proposed new employment land distribution including the proposed new 30 Hectares proposed for Airedale.
- 1.16 The policy is considered effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance. In line with NPPF paragraph 156 the approach seeks to set out a clear strategy for the delivery of development in particular homes and jobs, and in line with Paragraph 157 indicate where development would be appropriate.

## **Issue 6.5**

### **Urban Regeneration and Renewal:**

- a. **Is there sufficient justification and evidence to support the specific proposals for development at Keighley, including the need to release Green Belt land and the specific projects listed, and has the policy considered the regeneration, environmental, viability, use of brownfield land, impact on heritage assets and local communities, and infrastructure requirements, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**
- b. **Is there sufficient justification and evidence to support the specific proposals for development at Bingley, including the need for some local release of Green Belt land and the specific**

projects listed, and has the policy considered the regeneration, environmental, viability, use of brownfield land, impact on heritage assets, landscape and local communities, the balance between housing and employment land, and infrastructure requirements, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

- c. Is there sufficient justification and evidence to support the specific proposals for development at Silsden, including the specific projects listed, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance between housing and employment land, impact on heritage assets, landscape and local communities, and infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- d. Is there sufficient justification and evidence to support the specific proposals for development at Steeton with Eastburn, including the need for some local release of Green Belt land and the specific projects listed, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance between housing and employment land, impact on heritage assets, landscape and local communities, and infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- e. Is there sufficient justification and evidence to support the specific proposals for development at Baildon, including the need for some local release of Green Belt land, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance between housing and employment land, impact on heritage assets, landscape and local communities, and infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- f. Is there sufficient justification and evidence to support the specific proposals for development at Cottingley and East Morton, including the need for some local release of Green Belt land, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance between housing and employment land, impact on heritage assets, landscape and local communities, and infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

## Response

- 2.1 The Airedale Masterplan sets out the Councils ambitions for the Aire valley and includes settlements of Keighley, Bingley, Silsden

**and Steeton With Eastburn. This has informed the broad approach to these settlements together with the more up to date information produced in support of the Core Strategy.**

- 2.2 The justification and evidence in support of the housing distribution is set out under Policy HO3, the Council's position statement in relation to Policy HO3 and in Background Paper 2 (SD016).
- 2.3 The housing quantum proposed for the different settlements reflects their position within the settlement hierarchy, reflects the evidence of potential land supply in the Council's SHLAA and also reflects a range of environmental constraints and considerations. Keighley and Bingley are key centres along the Airedale Corridor and are proposed for the largest levels of housing growth accordingly. They are also priorities for regeneration. Steeton with Eastburn and Silsden are both identified as Local Growth Centres and offer a range of services and good links to neighbouring higher order settlements such as Keighley.
- 2.4 Evidence from both the SHLAA Update of 2013 and the provisional data from the third SHLAA indicate that the proposed housing targets are deliverable in each case. Indeed there is an excess of potential supply in some settlements. However the Council has been mindful of a range of environmental factors. For example flood risk is a prevailing constraint in Steeton with Eastburn while parts of Silsden lie within the 2.5km buffer zone around the South Pennines SPA / SAC.
- 2.5 Based on the findings of the SHLAA green belt changes of varying degrees would be required to deliver the proposed targets in these settlements with the exception of Silsden where targets are capable of being met by a combination of existing sites within the built up area and edge of settlement sites which lie within designated areas of safeguarded land.
- 2.6 The names schemes and sites related to currently known development sites and opportunities. Several sites are identified as key sites within the Airedale Masterplan.
- 2.7 In terms of existing role, facilities and infrastructure as well as planned infrastructure the policy has been informed by the following key pieces of evidence:
  - Settlement study (EB040 – EB42)
  - Growth Study (EBO37)
  - Local Infrastructure Plan ( EB044 )
- 2.8 The policy includes reference to key infrastructure improvements as informed by the LIP but this is not exhaustive.

- 2.9 The policy is clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance.

## **Issue 6.6**

### **Economic Development:**

- a. **Is there sufficient justification and evidence to support the principle that Keighley and Bingley will be the principal focus for indigenous economic development, including the specific sites identified?**
- b. **Is there sufficient evidence to justify the specific sites and proposals identified?**
- c. **Does the Policy adequately consider the role of tourism development and the impact of economic development on heritage/tourist assets?**

### **Response**

- 3.1 The justification and evidence in support of economic development is set out under Policies EC1 – EC4 and associated background paper 3 (SD018). Further detailed information was used to inform the approach is contained in the following:
- Bradford District Employment Land Review and Update (EB027)
  - Local Economic Assessment (PS/B001b xiv)
  - Leeds City Region Strategic Economic Plan (PS/B001b xv)
  - Settlement Study (EB040 – EB043)
- 3.2 The economic focus of Keighley and Bingley reflects their status as Principal Towns as set out under Policy SC4 and related employment policies including SC1- SC5. The names schemes and sites related to currently known development sites and opportunities. Several sites are identified as key sites within the Airedale Masterplan (XXX).
- 3.3 While tourism will provide opportunities for Airedale the policy does not make any explicit policy statement in relation to this sub area. Tourism has been flagged up more explicitly within sub areas where there is a specific and identifiable planning reason e.g. policy BD1 D(5) in relation to Saltaire, Policy WD1 C (1) in relation to Ilkley and PN1 C (3) in terms of Haworth and Bronte heritage. The plan supports tourism development broadly under policy EC4 (F).
- 3.4 Criterion AD1 D (6) makes clear the considerations with regards development and heritage. This needs to be read in conjunction with Policy EN3. It is note that a minor modification is being proposed to Criterion AD1 D (6) in order to clarify this aspect of the policy in response to representation from English Heritage.



## **Issue 6.7**

### **Environment:**

- a. Is there sufficient justification and evidence to support the proposals to improve the environment, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

### **Response**

- 4.1 The proposals are linked to regional work and data relating to green infrastructure, heritage-related data, ecological network mapping, landscape character assessment, sustainability appraisal and future work on local and neighbourhood plans. Implementation will however be dependent on council priorities. The approach is considered to be broadly consistent with national guidance.

## **Issue 6.8**

### **Transport:**

- a. **Is there sufficient justification and evidence to support the transport proposals, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**
- b. **What is the specific justification for the specific transport proposals identified, including the Airedale Transport Improvement Project and improvement of key transport corridors?**

### **Response**

- 5.1 The council believes that the transport proposals and policy elements contained in the Airedale sub area policies are effective, deliverable, justified with evidence, soundly based and consistent with the latest national guidance. The measures proposed are consistent with standard transport planning practice and reflect and were developed in the context of existing local and national transport policy, strategy and programmes. These include 'My Journey' the West Yorkshire Local Transport Plan, (to be referred to as the LTP), the West Yorkshire Plus Transport Fund (WY+TF) and the Leeds City Region Strategic Economic Plan (PS/B001b xv) and NPPF. The policies were deemed to be viable within the Bradford District Local Plan Core Strategy Publication Draft – Viability Assessment. (EB046)
- 5.2 The policies also reflect and support the policies in the Transport and Movement section of the Local Plan Core Strategy Publication Draft
- 5.3 Policies AD1 E1 and E6 are consistent with NPPF which in paragraph 30 states that "local planning authorities should support a pattern of development, which where reasonable to do so, facilitates the use of

sustainable modes of travel” and paragraph 34 also states “plans and decisions should ensure that developments that generate significant movement are located where the need to travel will be minimised”. This will be achieved through the application of the Accessibility Standards in Appendix 3 as referred to in policy AD1 E1.

- 5.4 The specific transport proposals contained in the policies are consistent with NPPF. Section 30 states ‘Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.’ The public transport and walking and cycling proposals contained in the policies support this. The highway proposals are specifically aimed at reducing congestion and facilitating development.
- 5.5 Section 41 of NPPF states ‘Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.’
- 5.6 The transport proposals contained in the policies meet that criteria as will be demonstrated in the following paragraphs.
- 5.7 A number of corridors identified as requiring intervention in terms of transport schemes or other transport initiatives in policy AD1 are consistent with those identified in the District Transport Study (EB039). These are:
  - A650 (Airedale Corridor between Keighley and Bradford)
  - A629/A644 (Keighley to Queensbury)
  - A6038 (Otley Road)
- 5.8 A number of the transport proposals contained in the policy will address issues on those corridors including:
  - Develop bus rail interchange facilities at Steeton and Silsden Station and Bingley station including enhanced bus network and pedestrian/cycle links to/from both stations
  - Improve sustainable transport facilities and links within and between the towns and villages in Airedale, including cross valley links. Improve and provide new cycling and pedestrian infrastructure. Improve public rights of way and canal towpaths.
  - Develop critical road infrastructure in accordance with the Connecting Airedale Transport Improvement Project including transport improvements to Hard Ings Road and Keighley Town Centre
  - Improve public transport access between Airedale, Regional Cities of Bradford and Leeds, as well as Craven.
- 5.9 Of the above schemes and others in development in Airedale:

- Hard Ings Road Improvement and an expansion of parking at Shipley and Silsden / Steeton Station are included in the West Yorkshire Plus Transport Fund programme and are scheduled for delivery before 2021 (see note below).
  - Transport improvements in Keighley Town Centre are at the consultation stage, funded and scheduled for delivery in 2016
  - New cycling infrastructure is planned along the Leeds and Liverpool Canal Towpath between Riddlesden and Kildwick (subject to Department of Transport acceptance of a business case recently submitted)
  - Government funding has been made available to allow development work on the Shipley Eastern relief Road to progress
  - The proposal in the West Yorkshire Plus Transport Fund for improved links to Leeds Bradford International Airport will support improved access from Airedale
- 5.10 Other projects will be identified more specifically and developed during the allocations DPD stage of the Local Plan. These will use available evidence to ensure that they are responsive to the needs of development and the local communities.
- 5.11 Note: The Hard Ings Road Improvement Scheme is included in the West Yorkshire Plus Transport Fund Programme. The West Yorkshire Plus Transport Fund programme has been demonstrated to assist both housing and employment growth. This was achieved through the application of an Urban Dynamic Model which was specifically informed by anticipated future development aspirations and opportunities. The Fund forms a central part of the Leeds City Region Strategic Economic Plan which in turn secured a 'City Deal' with Government which is providing a major element of the funding stream for delivery, with remaining funds coming from local contributions. The strength of the evidence provided to the Department for Transport led to the Leeds City Region securing £783m of Growth Fund and devolved Major Schemes funding for transport schemes over 20 years.
- 5.12 In conclusion it should be noted that Bradford Council and its partners in the West Yorkshire Combined Authority, the Highways Agency and Network Rail have a strong track record in developing transport projects that are supported by robust evidence and there is no reason to doubt that this will continue over the life of the Local Plan. Projects will be developed further in the context of the Allocations DPD to ensure that they are responsive to the specific requirements of sustainable development in the District

## **Issue 6.9**

### **Outcomes:**

- a. **Is there a reasonable or realistic prospect of the Outcomes set out in the Plan (¶ 4.2.1-4.2.5) actually being delivered by the end of the**

**Plan period, and what measures are in place to monitor success or enable contingencies to be put in place?**

**Response**

- 6.1 Paragraphs to 4.2.1 to 4.2. 5 set out the high level outcomes in support of the policy and delivery of the spatial vision and sub area policy. They will be delivered by the policy requirements of the sub area policy and wider policies of the Core Strategy as well as supporting non planning interventions through other actions of the Council and partners in particular in key regeneration areas subject of masterplans. The Outcomes while aspirational are realistic and are informed by the key evidence supporting the Core Strategy.
  
- 6.2 The key performance framework within the Core Strategy as outlined in Section 7 will be used to monitor the policies of the Local Plan. These will be published in the Annual Monitoring Report. The outcomes also link to other monitoring linked to the Community Strategy and State of the District work undertaken by the Council. Individual regeneration areas have their own monitoring systems and report to the Councils Executive at appropriate period on progress.