

Local Development Framework for Bradford

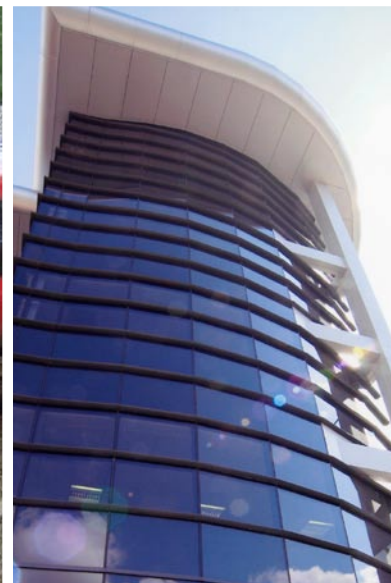
# Core Strategy

## Issues and Options

Summary of Representations

Topic Paper 2: Spatial Vision

December 2007



City of Bradford MDC

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## LIST OF CONSULTEES WHO SUBMITTED COMMENTS ON TOPIC PAPER 2

1. Airedale Partnerships
2. Arnold Laver
3. Baildon Community Council
4. Ben Rhydding Action Group
5. Bolsterstone Plc (submitted by Drivers Jonas)
6. H. Bosomworth
7. Bradford Centre Regeneration
8. Bradford Teaching PCT
9. Burley Community Council
10. Commercial Estates Group
11. Dacre, Son & Hartley
12. English Heritage
13. Environment Agency
14. Government Office for Yorkshire & Humber
15. Hallam Land Management (submitted by Nathaniel Lichfield & Partners)
16. Highways Agency
17. Home Builders Federation
18. Ilkley Civic Society
19. Ilkley Parish Council
20. KeyLand Developments Ltd (submitted by Sanderson Wetherall)
21. Lancashire County Council
22. Miller Strategic Land (submitted by Erinaceous Planning)
23. Natural England
24. Patchett Homes
25. The Ramblers Association
26. Redrow Homes Ltd
27. RSPB
28. "Save Our Pub"
29. Sport England
30. Taylor Woodrow Developments Ltd (submitted by Spawforths)
31. The Theatres Trust

32. West Register Realisations Ltd (submitted by The Land and Development Practice)
33. West Yorkshire Archaeology Advisory Services
34. Yorkshire Forward
35. Yorkshire and Humber Assembly
36. Yorkshire Water

COMMENT	ORGANISATION
<b>GENERAL</b>	
<p>The Airedale Partnership welcomes the Core Strategy and that many of the Issues and Options have been informed by the document <i>Airedale Corridor: a masterplan and strategy for Airedale</i>. As you will be aware implementation of the Masterplan is well underway and it is important to establish a planning policy framework, which supports and assists the achievement of the objectives of the Masterplan and the delivery of key projects.</p>	<b>Airedale Partnership</b>
<p>Par 3.16: We suggest that there are anomalies in this section. For instance, Utley and Tong being classed as Rural Villages. If such settlements are described thus, then so could Long Lee and Ben Rhydding. It may be time to recognise that, within what are classed as Rural Service Centres, that there are dispersed settlements in the same way that there are seven dispersed settlements identified within Bradford City Centre itself. We suggest that the question about protecting small shops in small villages and communities should be answered in a positive manner, but also that it should be clear that defined communities, such as Ben Rhydding and Long Lee must be included</p>	<b>Ben Rhydding Action Group</b>
<p>The tPCT welcomes the vision and its potential to impact positively on health and well-being, and believes that the broad objectives and strategy are appropriate to deliver the vision.</p>	<b>Bradford and Airedale Teaching PCT</b>
<p>There is no supermarket in Burley. The two self service stores are minimal, and smaller than that in Menston, not shown correctly on page 36.</p>	<b>Burley Community Council</b>
<p>The Introduction to Topic Paper No.2 needs to be much clearer on the timescale to which this Core Strategy relates. Paragraph 34 of PPS3 requires LPAs to plan for a 15-year period of housing provision from the date of adoption.</p> <p>Given the Core Strategy is forecast to be adopted in 2010, the plan period should be 2004 – 2025. The requirements of PPS3 appear to be missing from Topic Paper 2 Section 3.1 ‘National Policy’ – this needs to be rectified.</p>	<b>Dacre, Son and Hartley</b>

Para 5.8 – Core Strategy will need to be in general conformity with RSS.

Para 5.11-13 – It is accepted that this is an early stage of DPD preparation, but, apart from ‘core approach’ option, the spatial detail within the options put forward is rather limited (eg settlements for focused dispersal, which safeguarded land (?), and, in particular, focused growth poles (only one example given)). As a result of consultation the Council may need to consider other spatial options or a different mix. All options should be subject to SA/SEA and be strategic to provide guidance and direction to subsidiary DPDs. Options should also have an element of flexibility to address changing or unforeseen circumstances. They must also be realistic and offer genuine choice (e.g. they should not significantly conflict with national and regional policy without good reason and robust justification). Options which propose significant dispersal of development away from the principal urban area of the district (‘Bradford City’, Shipley/Baildon) are unlikely to be in accordance with national and regional policy.

We would suggest that it is likely that more than one ‘Preferred Option’ will be under consideration at Preferred Options stage for the purposes of consultation. Of these one may be favoured over the rest and, depending on consultation responses, taken forward to submission. The Council will need to have particular regard to setting out clear reasons for the selection of preferred options in the light of the evidence base (including SA/SEA) and representations made. These should include an explanation of consideration of all options considered (including those put forward at this stage of consultation), those rejected and why.

If only one spatial option is to be put forward at ‘Preferred Options’ stage this would have to be robustly justified at that stage and an full explanation given as to why all other options had been rejected. It would also be necessary to demonstrate that the public had a reasonable chance to regard the alternatives as viable and given its views on them, and that the spirit of the process had already been met at an earlier stage. On the basis of the information put forward at this stage and for a Core Strategy for a district of the size and characteristics of Bradford this would not seem to be an acceptable way forward.

(PPS 12, paras 4.12 & 4.13)

Spatial options should be illustrated on diagrams.

**Government Office for Yorkshire  
and Humber**

<p>Para 5.11 – The term ‘support’ should be avoided as its meaning is imprecise. The Council is reminded (without prejudice) of the Secretary of State’s representations on the draft RUDP relating to significant development at Silsden and the inquiry Inspector’s recommendations.</p> <p>Para 6.1 – Evidence will be needed to support the assumptions and policies in the DPD. What about shopping and town centres, for example?</p>	
<p>There is no supermarket in Burley. The two self service stores are minimal, and smaller than that in Menston, not shown correctly on page 36.</p>	<p><b>Burley Community Council</b></p>
<p>We welcome the references to RSS and the summary that provides the context for this consultation paper. There is clearly a strong link between the overall vision and spatial objectives for the Local Development Framework that are set out in the Core Strategy, and with both the current and draft Regional Spatial Strategies.</p> <p>The Assembly is encouraged by the reference in paragraph 5.4 to the Regional Settlement Study, which identified the following as Local Service Centres in the Bradford District: Addingham, Bingley, Burley in Wharfedale, Denholme, Harwood/Crossroads/Lees, Menston, Queensbury, Silsden, Steeton with Eastburn and Thornton. The RSS makes it clear that that this Study was a starting point from which local planning authorities would need to identify the Local Service Centres in their areas – based, for example, on the more local studies that are summarised in these documents - that should provide a focus for limited housing and economic development.</p> <p>The aim of the existing RSS (December 2004) is to guide development to sustainable locations and to focus development in main urban areas, market and coalfield towns (Policy P1). This key strategic approach is reinforced in the Yorkshire and Humber Plan (Draft RSS December 2005), which is more specific about the desired location of development in Policies YH1 to YH8. These clearly provide a policy context and direction that emphasises the need to concentrate development in Regional and Sub-Regional Centres, provide for sufficient development in Principle Service Centres for them to fulfil their important role and to allow limited development in Local Service Centres, primarily to meet local need for affordable housing and to enable economic diversification. The overall aim is to reverse the trend of dispersal of development, encouraging a settlement pattern that helps to fulfil the RSS objectives.</p>	<p><b>Yorkshire and Humber Assembly.</b></p>
<p>Yorkshire Water’s largest interest in the Bradford area is Esholt Waste Water Treatment Works (WWTW). It is a large strategic works serving over 300,000 people, where sewage and sludge are</p>	<p><b>Yorkshire Water</b></p>

handled and treated to ensure that the environmental impacts of wastewater meet the highest European standards. Our concern is to preserve the operational integrity of this asset and to continue to meet the demands placed on it by the businesses and people of Bradford.

Due to the requirements of the Freshwater Fisheries Directive we are currently undertaking an extensive programme of improvements at the works. This will lead to a significant area of land being released from operational use. The majority of this land is likely to become available for development during the lifetime of the Local Development Framework. Esholt WWTW already has three areas of land allocated as Major Developed Sites within the Adopted Replacement UDP and any land that becomes available would be classed as a brownfield site within the Green Belt.

Para. 3.43 of topic Paper 2 highlights the “Airedale Corridors Master Plan (2005). The likelihood of surplus land at Esholt becoming available for re- use was identified within the Master Plan as part of the long term vision for the area. Any future use will clearly have to be compatible with the continued operation of the WWTW, albeit within a reduced footprint. The Core Strategy must complement and support the aspirations of the Master Plan whilst allowing greater flexibility in terms of land use allocations that will meet both Y.W.’s operational requirements and the social, economic and environmental needs of the area.

Yorkshire Water does not believe any of the spatial strategy options in ‘Topic Paper 2: The Spatial Vision and Strategy for Bradford’ identify the best use of the available land and infrastructure in Bradford. We propose a mix of the spatial options, including the existing strategy and option C. The main urban area of Bradford City should be a major focus for new development. The Sustainability Appraisal states that ‘intensive development of urban areas is likely to reduce unprotected areas of vegetation and trees, lead to increased congestion and put pressure on infrastructure’. However, if development is focussed on brownfield land, existing infrastructure that served the original building can frequently be re-used without further disruption to the area in providing, for example, water and sewerage connections to these sites. Similarly, development outside of the main urban areas on brownfield land should seek to be situated where there are good existing levels of infrastructure new development to be as sustainable as possible and allow for brownfield sites within Green Belts to be more readily developed. or where new infrastructure is planned (as described in Option C). This would encourage

<b>SPATIAL VISION AND OBJECTIVES</b>	
<b>Q 2.1 'IS THE VISION RIGHT?'</b>	
<b>The Vision is right</b> and reflects both spatial vision of the 2020 Vision and fits well with the vision for Airedale as a creative, connected and lifestyle corridor within a rural backdrop.	<b>Airedale Partnership</b>
The Vision of the Bradford Core Strategy is set out in Paragraph 4.2. One part of the Vision is for there to be an: "Enhanced role of Bradford City as the key regional centre with the city centre a thriving sub-regional shopping, commercial and transport hub within a balanced and strong district wide economy".  Arnold Laver is in full support of this objective and encourage the Council to promote the redevelopment of previously-developed land with the city for mixed use retail and commercial use.	<b>Arnold Laver</b>
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We offer support for the spatial vision for the Bradford District set down in the CSIO, particularly it's recognition of the role that new house building and employment opportunities can play in delivering that vision.  We support the delivery of the vision in all of the District's settlements. This can be assisted by the identification and release of new housing and employment opportunities by the LDF over is timeframe.	<b>Commercial Estates</b>
<b>The vision is right</b> and will apply to Bradford for the period 2004 – 2025. Unfortunately, we are not convinced the suggested approach in the Issues and Options paper matches the vision.	<b>Dacre, Son and Hartley</b>
<b>We support the proposed spatial vision</b> for Bradford, especially the final two criteria relating to the protection and enhancement of its heritage and the reinforcement of its local distinctiveness. However,	<b>English Heritage</b>

<p>given the acknowledgement within topic paper 1 of the importance of its landscape in defining the character of the district, the penultimate criterion might be amended to read'...natural environment, heritage, landscapes and diversity...'</p>	
<p><b>We offer support for the spatial vision</b> for the Bradford District set down in the CSIO, particularly is recognition of the role that the new house building can play in delivering that vision.</p>	<p><b>Hallam Land Management</b></p>
<p>It is suggested that the vision will need to be expanded and expressed more spatially. Other than 'Bradford City' (and the meaning of this term and extent of the district it covers could usefully be explained) and Airedale generally, there is no specific references to other areas. What about the role and future of other larger settlements (e.g. Keighley, Bingley &amp; Shipley within Airedale), Ilkley, the suburban/district centres and villages? Where will transport connections be improved? Where are the main areas for environmental protection? <u>What about the future extent of the green belt?</u> What is the vision for rural areas (Regional Rural Framework)? What is the vision for the role of Bradford in the Leeds City Region? The vision should, with regard to regional and sub-regional context carry forward the spatial elements of the community strategy and describe what the area will look like (e.g. where and what sort of development will take place, where quality of life will be improved, areas for protection and enhancement). It should provide a framework to which the spatial objectives can link and deliver and be more Bradford district specific.</p>	<p><b>Government Office for Yorkshire and Humber</b></p>
<p>Should perhaps be broadened to include more rural areas e.g Ilkley and its tourism needs</p>	<p><b>Ilkley Parish Council</b></p>
<p>Consequently, in relation to the appropriateness of the Vision (Q. 2.1) it is considered that the Core Strategy should make particular references to maximising the potential of specific locations and sites, as well as the general potential which is always referenced in the Spatial Vision (Para 4.2) in order that particular opportunities, such as the Esholt Research and Design Campus, are encouraged appropriately through the statutory planning process. In this regard, the locational principles which are established (Q. 2.3) should reflect the approach of the Airedale Masterplan Strategy in identifying unusual opportunities for key regeneration and employment generating developments.</p> <p>Inevitably, this will need to be done within an overall strategy building on principles of sustainability, particularly through the use of resources of previously developed land and by encouraging development</p>	<p><b>Keyland Development Ltd</b></p>

in links which can build on existing public transport infrastructure.	
It is <b><i>considered to be acceptable in broad terms</i></b>	<b>Miller Strategic Land</b>
Natural England recognises the need for a spatially responsive vision to the core issues which are most pressing within the plan area, and which pull together established objectives of higher tier and other guiding strategy. Natural England notes the penultimate paragraph of the vision which addresses protection and enhancement of the district's natural environment. This is welcomed as far as it goes. However, it is considered that reference to addressing the causes and effects of climate change should be afforded some profile at the highest level within the LDF. We would therefore support a clear emphasis on achieving sustainable development across the district which addresses at the local level climate change matters, both in respect to reduction in causes and addressing of local implications and threats	<b>Natural England</b>
The <b><i>overall Vision for the District is supported in principle.</i></b>	<b>Redrow Homes</b>
We welcome the commitment to the protection of the natural environment. To ensure sustainability is fully integrated the Vision should also commit to the prudent use of natural resources. The fourth paragraph should refer to improved access through public transport. The fifth paragraph should promote high-quality open space as well as sustainable design.	<b>RSPB</b>
<b>Yes.</b>	<b>Taylor Woodrow</b>
<b><i>We strongly support the 2020 vision</i></b> , especially paragraph 5 which acknowledges the need to protect the natural environment and heritage. Although we suggest that it could be re-worded to make its meaning a little clearer, such as 'continued protection and enhancement of its diverse natural environment and heritage through appropriate, high quality development and land management' given there could be high quality development proposed for certain sites that would be totally inappropriate for the continued protection of the natural and/ or historic environment	<b>West Yorkshire Archaeology Advisory Service</b>

<b>Q 2.2 ARE THE OBJECTIVES APPROPRIATE TO DELIVER THE VISION? ARE THERE ANY OMISSIONS?</b>	
The objectives are appropriate.	<b>Airedale Partnership</b>
<p>Arnold Laver are in support of all of these objectives and their appropriateness to deliver the Vision of the Core Strategy. However, it is suggested that an additional objective is included at Paragraph 4.4. This objective should read as follows:</p> <p style="padding-left: 40px;">“To promote the redevelopment of previously-developed land which is in sustainable locations”.</p> <p>The redevelopment of the numerous brownfield sites which occupy much of the inner area of Bradford is key to achieving a number of the other Core Strategy objectives. These sites, situated within easy distance of the City Centre, are prime locations for the sustainable development of employment, retail, education, health and residential, including possibly affordable housing, uses. The mixed use redevelopment of these sites, consisting of a combination of these uses, would enable the creation of communities promoting social equity and inclusion in these areas.</p>	<b>Arnold Laver</b>
<p>Bolsterstone Plc are in support of all of these objectives and their appropriateness to deliver the Vision of the Core Strategy. However, it is suggested that an additional objective is included at Paragraph 4.4. This objective should read as follows: “To promote the redevelopment of previously-developed land which is in sustainable locations”.</p> <p style="padding-left: 40px;">“To promote the redevelopment of previously-developed land which is in sustainable locations”.</p> <p>The redevelopment of the numerous brownfield sites which occupy much of the inner area of Bradford is key to achieving a number of the other Core Strategy objectives. These sites, situated within easy distance of the City Centre, are prime locations for the sustainable development of employment, retail, education, health and residential, including possibly affordable housing, uses. The mixed use redevelopment of these sites, consisting of a combination of these uses, would enable the creation of communities promoting social equity and inclusion in these areas.</p>	<b>Bolsterstone Plc</b>
We support the objectives listed in the CSIO, particularly those relating to the role of new housing and employment opportunities as well as enhancements to the natural environment and the role that they can play in delivering the vision.	<b>Commercial Estates</b>

<p>While we broadly agree with the objectives, we are concerned they may not adequately deliver the vision as there is little in the text on how best to monitor progress, track any forecast changes and be both flexible and responsive in the approach.</p> <p>The drive towards developing in only a limited number of areas with a very limited range of housing products will fail to match the requirements of the housing market. PPS 3 sets out the Governments strategic housing policy objectives with a goal of ensuring “that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. In our opinion, this goal suggests the Council requires a robust evidence base on where people want to live in the district and a more flexible attitude to delivering those areas.</p> <p>Since early 2006, Bradford Council has not responded to significant change in household formation forecast and has chosen instead to maintain its UDP policy stance and rely on a 2010 Core Strategy to bring about a change. In the intervening period between 2005 and 2010, the Council will have under-supplied housing demand by some 700 units per annum and added unnecessarily to housing market stress.</p> <p>National Land Registry figures produced this week show Bradford to have the fastest growing house prices in the country. A detached house in Bradford cost £110,875 in February 2001. In February 2007 the same house is £262,770. The average house in Bradford rose by 11% in the past 12 months. Price differentials on detached is growing faster than any other house type.</p> <p>Within Topic Paper 2 and, under the heading of ‘Spatial Strategy’, Section 5 reminds us of the ‘Growth Areas’ identified in draft RSS and the settlement hierarchy contained within Policy YH1 and YH5 - YH8. Unfortunately, the rest of Topic Paper 2 then quickly forgets that text.</p>	<p><b>Dacre, Son and Hartley</b></p>
<p>We support the proposed objectives to deliver the vision, particularly those which relate to the protection and enhancement of the historic assets of the district and the reinforcement of its local distinctiveness. The third bullet point would benefit from a slight amendment to more clearly articulate this point perhaps along the following lines ‘...attractive built and natural environment which helps reinforce the local distinctiveness of its settlements</p>	<p><b>English Heritage</b></p>

<p>We support the objectives:</p> <ul style="list-style-type: none"> <li>• To improve the quality of the built environment through the design, maintenance and accessibility of buildings and spaces in order to provide a clean, safe sustainable and attractive built and natural environment with local distinctiveness</li> <li>• To safeguard, enhance and add to the diverse historic and natural heritage of the District</li> <li>• To help reduce the impact on the environment and address climate change by reducing pollution and energy consumption and promoting the use of renewable energy</li> <li>• To promote the sustainable management of waste</li> <li>• To safeguard and manage the District's natural and renewable resources including energy with care.</li> </ul> <p>We would support these objectives being carried through into and influencing the formulation of Preferred Options</p>	<p><b>Environment Agency</b></p>
<p>It is considered that there is not sufficient information on how to deliver the change required in Bradford to achieve the spatial and growth requirements for the next 15 to 20 years.</p>	<p><b>Home Builders Federation</b></p>
<p>The Agency is supportive of the spatial vision for the district to create a sustainable district that ensures the well being of residents and visitors. The proposed Plan objectives are also supported, particularly:</p> <ul style="list-style-type: none"> <li>• To improve public transport and highway, ensuring safety, efficiency, sustainability and accessibility</li> <li>• To provide better connections within the District and with other parts of the Region and country</li> </ul>	<p><b>The Highway Agency</b></p>
<p>The objectives, in including some of the above issues are wider than the vision, further suggesting that the 2020 Vision be updated.</p>	<p><b>Ilkley Civic Society</b></p>
<p>Yes, provided the differing requirements are met across the district e.g. Ilkley's needs are different to a city centre.</p>	<p><b>Ilkley Parish Council</b></p>
<p>The bulletpoint stating that connections within the district and with other parts of the region and country should be improved is supported.</p>	<p><b>Lancashire County Council</b></p>

<p>We have no objection to be the objectives. It is considered however, that one of the key objectives should be to ensure that the development requirements for the district are delivered. A separated 'objective' should be specifically included to this effect.</p>	<p><b>Miller Strategic Land</b></p>
<p>Due to our environmental principles, we consider that the objectives are deficient in a number of respects, strategically and in detail. We feel that the objectives should have more regard for the following principles.</p> <p><b>Climate Change</b></p> <p>The scope of the climate change objective is however very general, and does not address implications for landscape biodiversity and the challenges faced by species and habitats in the face of climate change in the district. We suggest the following key principles:</p> <ul style="list-style-type: none"> <li>• Adopting landscape style conservation management in which protected areas are a part</li> <li>• Building healthy (resilient ) natural systems and processes, not just protecting the status quo</li> <li>• Reducing habitat fragmentation by increasing landscape connectivity and permeability</li> <li>• Promoting adaptation policy integration with land and water management sectors</li> </ul> <p>Natural England believes that the LDF can help deliver this priority by</p> <ul style="list-style-type: none"> <li>• Facilitating investment in clean energy technologies by assessing potential impacts on the natural environment and how these might be avoided</li> <li>• Identifying and promoting the role of the natural environment in reducing and removing green house gas pollution, including recognition of the role of land managers as carbon managers</li> </ul> <p>These latter points are partially addressed by objectives 8 and 12 and are supported</p> <p><b>Environmental Capacity</b></p> <p>Environmental capacity as an essential and fundamental principle to be worked within is essential if the District is to achieve more sustainable development.</p> <ul style="list-style-type: none"> <li>• Very good design and energy efficiency might enable more development to be accommodated without proportionally greater impacts on the environment.</li> <li>• The capacity for development to be accommodated should be fully informed by the adequacy of existing environmental infrastructure</li> </ul>	<p><b>Natural England</b></p>

<p><b>Green Infrastructure</b></p> <p>Green infrastructure is the network of green and blue spaces, and the natural elements that are interspersed within and connect cities, towns and villages. They are essential for the well being of communities due to the informal exercise, recreation and relaxation opportunities it provides linkages between the best natural and green assets across the district need to be improved. Also, new and enhanced green networks and natural assets need to be incorporated into planned urban development. Objective 3 is welcomed in terms of its general thrust, it fails to elaborate upon key elements of the 'natural environment' .the objective should make clear reference to biodiversity and landscape capital of the district and the need to work within the capacity of those elements to accommodate change. Moreover, the objective is relatively obscure as to whether protection and enhancements of these facilities is prioritised. Reference to the Bradford Landscape Character Assessment in paragraph 2.18 and the strong ecological references within the BCS are welcomed, but stronger reflection of these issues needs to be brought through into these core objectives. The best and or designated natural environment capital of the district should be regarded as a finite and non tradable asset, whilst in areas which suffer from a deficient natural environment should be enhanced.</p> <p>Objective 6 is welcomed but should emphasise the need for enhancement and maximising public rights of way. Safe accessibility to all members of the community to the PR0W network should be an important element.</p> <p>Objective 9 should be expanded as follows ' To provide accessible and varied opportunities for leisure and recreation including access to the countryside via green infrastructure networks for walking, cycling and horse riding'.</p>	
<p>The stated objectives to deliver the Vision are appropriate.</p>	<p><b>Redrow Homes</b></p>
<p>There are several strong objectives, particularly those referring to the natural environment, climate change and natural &amp; renewable resources. The third objective should have an enhanced emphasis on ensuring built development is directed to sustainable locations, particularly with reference to flood risk.</p>	<p><b>RSPB (52)</b></p>
<p>The objectives seem appropriate and as far as we are concerned there are no omissions. However, we are concerned with regard to the fourth objective, which refers to catering for the needs of current and</p>	<p><b>Taylor Woodrow</b></p>

<p>future residents in a growing District. We consider that this is a vague statement as needs are very wide ranging and can be interpreted in a number of different ways. Furthermore, referring to only the growth of the District does not link or relate to the wider growth of the Region. We suggest that the objective be amended as follows:</p> <ul style="list-style-type: none"> <li>• To provide a range of quality dwellings in terms of type, and affordability, to cater for the current and future growth of the District and the Region.</li> </ul>	
<p>We support the plan objectives in topic paper 2, but the phrasing regarding ‘cultural’ requires amendment- either to ‘culture’ or ‘cultural facilities’</p>	<p><b>The Theatres Trust</b></p>
<p>We strongly support the inclusion of the following objectives and suggest inclusions (where underlined)          “To improve the quality of the built environment through the design, maintenance and accessibility of buildings and spaces in order to provide a clean, safe, sustainable and attractive built and natural environment <u>which retains and enhances its distinctive local historic character</u>”          “ To safeguard, enhance and add to the diverse historic and natural heritage of the district”</p>	<p><b>West Yorkshire Archaeology Advisory Service</b></p>
<p>The Regional Economic Strategy (RES) recognises the important contribution the objectives of the RES, and the continued economic renaissance of Bradford. We specifically welcome the following plan objectives: to create a sustainable district through high quality developments; to provide support for a successful and growing economy, to attract innovative and high value jobs ; and to reduce the District’s Environmental impact, which we consider complement the objectives of the RES. However, we consider that Topic Paper 2 would benefit from the addition of one that refers specifically to reducing the need to travel and minimising travel by private car.</p>	<p><b>Yorkshire Forward</b></p>

LOCATIONAL PRINCIPLES	
Q 2.3: ARE THE LOCATIONAL PRINCIPLES CORRECT?	
<p>Overall the location principles set out in this section are supported. The proposal that development should give priority to previously developed land is to be welcomed. These sites should be seen as a priority for investment of high quality with good connections, design and sustainability etc. Support should be given to the larger settlements in Airedale as set out in the Masterplan but the proposal to allow limited development in the well located villages will assist in creating sustainable communities rather than just dormitory villages for the larger urban areas.</p> <p>The Airedale Masterplan identifies a number of distinct roles for each of the 3 major towns of Keighley, Bingley and Shipley: Keighley being a town of heritage and innovation; Bingley, a distinctive market town with a creative edge and Shipley an international gateway to Airedale. Details can be found in the appropriate Masterplan Town Plan.</p> <p>The provision of appropriate infrastructure is key to this approach. The Airedale masterplan identifies a number of key infrastructure projects, notably the Shipley Eastern Link Road and the dualling of Hard Ings in Keighley plus long-term improvements to address congestion in the Shipley/Saltaire. The Masterplan also suggests continued investment in the public transport network to improve the quality of the railway stations in Airedale, improve bus/rail interchanges and the development of a rail link to Leeds/Bradford Airport. The Masterplan also identified the need to increase the opportunity to walk and cycle through the development of the Airedale Greenway.</p>	<p><b>Airedale Partnership</b></p>
<p>The locational principles are fine, except that they assume everyone is starting from zero. Should there not be some recognition of recent planning history in each settlement?</p>	<p><b>Burley Community Council</b></p>

<p>We do not offer support for the locational principles set out in the CSIO.</p>	<p><b>Commercial Estates</b></p>
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<p>No. The locational principles appear to be inconsistent with draft RSS.</p> <p>Paragraph 5.4 clearly sets out the distribution requirement starting with the Sub-Regional centre and then the major towns of Keighley and Ilkley. In addition, Airedale and the link between Leeds and Bradford are seen to be 'growth corridors'. This is not repeated in paragraph 5.9 of the Topic Paper or the following text (paragraph 5.10 – 5.13).</p>	<p><b>Dacre, Son and Hartley</b></p>
<p>Consideration of flood risk should be a locational principle. The recently issued PPS25, Development and Flood Risk sets out guidance that LPAs should follow in allocating sites and in determining planning applications. Please refer to the general comment (a) above regarding PPS25 and SFRA.</p>	<p><b>Environment Agency</b></p>
<p>PPS12 paragraph 4.24 sets out the 9 tests of soundness to be considered in the preparation and examination of a Development Plan Document with test iv requiring plans and strategies to be consistent with the regional spatial strategy for the region. The locational principles are inconsistent with the draft RSS. The issues and options demotes the RSS principal service centres, ignores the RSS growth areas of Leeds/Bradford link and the Airedale corridor from the city centre to Craven. This needs to be corrected to ensure that the Core Strategy is not found to be unsound.</p>	<p><b>Home Builders Federation</b></p>
<p>The location principles that have been developed to underpin the spatial development Strategy for the District, which are supported by the Agency, particularly:</p> <ul style="list-style-type: none"> <li>• Smaller settlements in good transport corridors should provide an appropriate scale of development commensurate with the size and role of the settlement</li> <li>• New development should be in accessible locations.</li> </ul>	<p><b>Highway Agency</b></p>
<p>The Locational Principles are satisfactory – in principle. The problem is that developers prefer greenfield and large garden sites to re development, because it is easier to cost accurately where the ground has not been previously used and there is a lack of knowledge about mining, pollution etc. It is clear that some owners of large derelict inner city and urban sites are holding out for better profit margins against the best interests of society. Some inner Bradford urban sites apparently awaiting redevelopment are in a shocking condition and there needs to be some impetus in this strategy to proceed with redevelopment forthwith.</p>	<p><b>Ilkley Civic Society (</b></p>

<p>Conversely, the levels of rural development, such as is seen at Addingham and Burley in Wharfedale are a depressing sprawl, dwarfing the original settlements rather than enhancing them. Care needs to be taken not to encourage more unsympathetic development of this nature.</p>	
<p>Yes</p>	<p><b>Ilkley Parish Council</b></p>
<p>The locational principles do not provide any support for sustainable urban extensions. This could potentially undermine the overall approach of managing growth and change with the region, which is to reverse the trend of dispersal away from cities and major towns and to renew these areas as the prime focus of this activity. Where development requirements cannot be met within the existing boundaries in main urban areas, support should be given to urban extensions, where such an approach would deliver the most sustainable pattern for development. It is acknowledged that in broad terms, priority should be given to previously developed land over Greenfield. However, the re-use of previously developed land does not always represent the most sustainable option or make the most efficient use of resources. Although there should be a presumption in favour of using sustainable previously developed sites, there are circumstances where Greenfield land, including urban extensions, is preferable to the redevelopment of remote previously developed land. Placing too much emphasis on the use of previously developed land could result in a tension with the principle of urban concentration, which, as acknowledged in the emerging RSS, is the most effective way of reducing greenhouse gases and making efficient use of existing and future infrastructure. Furthermore, the over reliance on potentially constrained previously developed sites could result in the authority failing to identify sufficient 'deliverable land for development. This would cause conflict with the approach to delivering a flexible supply of housing land as advocated by PPS3.</p>	<p><b>Miller Strategic Land</b></p>
<p>We would broadly support the principles for a spatial strategy set out at 5.9 in terms of moving towards sustainable development. However, in doing so the council should have full regard to the potential importance of brownfield sites for their biodiversity value. Whilst national and regional policy supports brownfield development over Greenfield sites, their importance for habitats, particularly within urban areas can be very significant. The value of Greenfield sites can, conversely sometimes be of low biodiversity value, although their landscape and setting value are often important. Whilst such attributes may not normally justify the development elsewhere, appropriate measures should be taken to retain habitat interest where possible, avoiding harm and where this is not possible, mitigating it. Residual</p>	<p><b>Natural England</b></p>

<p>harm should be adequately for through on or off-site provision of habitat which will afford a net gain in the overall resource whenever possible. Such principles should underpin the policy approach to development across the plan area.</p>	
<p>The locational principles are broadly appropriate but require some amendments.</p> <p>Further clarification is needed as to the extent of the specified areas. The requirement for a hierarchical approach to defining/classifying settlements is understood but the classification is unclear as to the extent of the areas. In the absence of clear guidance on the extent of these areas it is considered that the Core Strategy needs to include plans defining these areas and the boundaries within which development will be acceptable subject to other LDF policies.</p> <p>It is stated that priority will be given to previously developed land over greenfield land. Such an approach must take care to accord with the principles of PPS3 which removes the presumption in favour of brownfield land first (as was in PPG3) and replaces this with a somewhat weaker preference for brownfield land first and also removes the sequential approach to housing land allocations. The Core Strategy must allow for exceptions when greenfield sites can be brought forward where brownfield sites perform so poorly in relation to sustainability criteria as to exclude their use for housing. Any suitability criteria should refer to the relative sustainability of greenfield sites compared to brownfield sites with the inclusion of 'exception' criteria. This would encourage the development of sites, which will be required to meet RSS housing targets.</p>	<p><b>Redrow Homes</b></p>
<p>A further principle should be included: that development should be in locations where impacts on biodiversity and natural resources are minimised. In particular, <i>'limited economic development'</i> (5.11) within Ilkley and Burley should be directed away from locations that could result in direct or indirect impacts to the internationally important bird populations of the South Pennine Moors SPA. Several citation species forage outside the designated site on surrounding in-by-land: there is therefore the potential for development to result in impacts on the SPA outside the designated sites. Core Strategy policies should state the strong legal protection given to the SPA and SAC by the Habitats Regulations, and set out the implications for development that could affect these sites.</p> <p>We agree that previously developed land should be prioritised over green-field land, but note that</p>	<p><b>RSPB</b></p>

<p>brown-field land can have high biodiversity value. We draw the Council's attention to paragraph 15 of Planning Policy Statement 9: Biodiversity and Geological Conservation (PPS9), and recommend that the Core Strategy ensures all developments on brownfield land are evaluated for their biodiversity potential, and where this is of local or greater importance a design scheme incorporating this into the development is adopted.</p>	
<p>The locational principles seem appropriate; however we have some concerns regarding the location of new development. The first locational principle seems overly restrictive and does not seem to take into account the emergence of PPS3. Restricting development to be within built up areas is inflexible and does not allow for exceptional circumstances or if there were a shortage of readily available developable land. Furthermore, in certain situations land on the edge of built up areas can be more sustainable than land within a built up area. As such, land adjacent to built-up areas should be considered for development if it is shown to be sustainable. PPS3 rightly expresses concern at family housing being delivered by the planning system. The locational principles need to take account of meet the dwelling needs of all households.</p>	<p><b>Taylor Woodrow</b></p>
<p>This question considers whether the locational principles relating to the current settlement hierarchy for the authority, as set out in the Replacement UDP, are correct. The current settlement hierarchy within the existing Replacement UDP is considered to be appropriate and in line with national and regional policies. However, whilst it is acknowledged that it is appropriate for the LPA to seek to provide a large proportion of the housing requirement within the main urban areas of Bradford, Shipley and Baildon it is also important to strike the right balance between these urban areas and other sustainable urban areas and settlements which offer a good level of services and employment opportunities such as Queensbury. We wholly endorse the inclusion of Queensbury within the second tier of the settlement hierarchy as it is one of the larger settlements within the District, but it also lies close to the urban area of Bradford with good community links to it.</p> <p><b><u>Options</u></b></p> <p>In response to the three options regarding the growth of settlements within the District that have been presented it is our view the Option A, with proposes regeneration and selective growth, is the most suitable. This advocates the regeneration of the main urban area but also an appropriate distribution of</p>	<p><b>West Register Realisation Ltd</b></p>

<p>housing land to other selective larger settlements in the hierarchy such as Queensbury. It is considered that this option offers the advantage that the main proportion of development will go to the urban area of Bradford, but also that an appropriate level of housing will be directed to those larger settlements, such as Queensbury where there are existing infrastructure and services. This option will therefore provide a range and chose of housing sites and ensure that a wide range of needs will be met. The other two available options do not offer this and therefore they are likely to encourage a less sustainable format of development.</p>	
<p>We support the stated locational principles.</p>	<p><b>West Yorkshire Archaeology Advisory Service (WYAAS)</b></p>

<b>Q 2.4: WHAT ARE THE ROLES AND FUNCTIONS OF EACH OF THE SETTLEMENTS OVER THE NEXT 20 YEARS?</b>	
The Airedale Masterplan identifies a number of distinct roles for each of the 3 major towns of Keighley, Bingley and Shipley: Keighley being a town of heritage and innovation: Bingley, a distinctive market town with a creative edge and Shipley an international gateway to Airedale. Details can be found in the appropriate Masterplan Town Plan.	<b>Airedale Partnership</b>
The role and function of each settlement should be the subject of a separate evidence based topic paper founded upon the most up to date employment growth forecasts, household formation and housing needs, environmental constraints and infrastructure constraints – this is currently absent from the evidence base.	<b>Dacre, Son and Hartley</b>
Burley and Menston have been overwhelmed by continual construction. The first UDP inquiry was told, by Andy Haigh, that Burley was reaching its housing capacity. Is there not a point at which you are forced to say 'enough?'	<b>Burley Community Council</b>
Likely to continue as present.	<b>Ilkley Civic Society</b>
As now	<b>Ilkley Parish Council</b>
We can concur with the statement in the spatial strategy regarding support for the larger settlements in Wharfedale that the area should be the focus for limited economic development and limited residential development to meet local needs.	<b>'Save us Pub'</b>
Yorkshire Forward's Renaissance programme has focused a considerable amount of investment on the region's town and city centres. Renaissance is about the environment, the built form and the quality of our urban centres with the programme creating long term visions for the region's towns and cities, and securing sustainable places in which to live, work, visit and invest for future generations.	<b>Yorkshire Forward</b>

<b>Q 2.5: IS THE DEFINED HIERARCHY APPROPRIATE?</b>	
Support should be given to the larger settlements in Airedale as set out in the Masterplan but the proposal to allow limited development in the well located villages will assist in creating sustainable communities rather than just dormitory villages for the larger urban areas.	<b>Airedale Partnership</b>
We question Baildon's place in the defined hierarchy with reference to existing services and transport infrastructure. Baildon's topographical features, particularly the position of Upper and Higher Baildon make communications difficult. Train services are not comparable with those of Keighley, Bingley, Ilkley Burley and Menston. All of these have services going directly to Bradford and Leeds. It is also difficult for many to access Baildon Station. Bus services are considered to be inadequate in that they finish much too early in the evening and are too infrequent for residents along West Lane and Lucy Hall Drive. These people are limited in their ability to travel into Baildon itself for shopping. It is therefore not surprising that where possible people tend to travel by car. A bus service within Baildon should be considered. At present people living in Charlestown who wish to travel to medical services in Baildon have to go by bus into Shipley and then take a bus to Baildon.	<b>Baildon Community Council</b>
We can concur with the statement regarding support for the larger settlements in Wharfedale that the area should be the focus for limited economic development and limited residential development to meet local needs. It may be that such a statement is contradicted by the options questions asked which appear to raise the question of using safeguarded land on the edge of settlements or localised changes to the green belt in the same locations. Such options would contradict the commitments to supporting rural land use as well as threatening important and well established parts of the green belt.	<b>Ben Rhydding Action Group</b>
The hierarchy should single out the City Centre and the City, including Shipley/Baildon.	<b>Bradford Centre Regeneration</b>
<p>We offer support for the spatial vision for the Bradford District set down in the CSIO, particularly its recognition of the role that new house building and employment opportunities can play in delivering that vision.</p> <p>We support the delivery of the vision in all of the District's settlements. This can be assisted by the identification and release of new housing and employment opportunities by the LDF over its timeframe.</p>	<b>Commercial Estates</b>

<p>No. It fails to translate the requirements of draft RSS and fails to recognise areas of growth (both economic and housing).</p> <p>The focussed development in Bradford City/Shingley and Baildon speaks of “raising density” in regeneration areas. While we are not opposed to raising densities in urban areas, we will expect the Council to produce evidence as to why such densely developed areas which are clearly in need of significant regeneration, need further dense development. In our opinion, these areas currently suffer from over dense development and are in need of green open spaces and parklands to improve their environments in order to attract investment.</p> <p>Under the sub-heading ‘Support The Larger Settlements In Airedale’ we are confused as to how this RSS ‘economic growth area’ should only be supplied with “<u>limited residential development to meet local needs</u>”. If the Aire Valley from Bradford City through to Craven is to be an RSS “growth area”, the Council needs to take a more responsible approach to meeting jobs with homes in the manner promoted in the most recent Northern Way documents. This section of the Topic Paper 2 does not conform with draft RSS.</p> <p>Under the sub-heading ‘Support The Larger Settlement In Wharfedale’, the recognition that Ilkley is identified as a Principal Service Centre in draft RSS appears to have been over-looked and relegates Ilkley to the same status as Burley and Menston. This section of the Topic Paper does not conform with draft RSS. We recommend Ilkley, Burley and Menston are grouped as the Ilkley Principal Centre group of settlements in order to allow land allocations to be made in this zone.</p>	<p><b>Dacre, Son and Hartley</b></p>
<p>We support the settlement hierarchy set down in the CSIO particularly its identification of the following at its tier 1 ‘Focus development within Bradford city including Shingley/Baildon’.</p> <p>We note that the area of Allerton is included within the above tier 1 and therefore that it should be amongst those areas of Bradford City where new development, including new house building, should be focused over the LDF period.</p>	<p><b>Hallam Land Management</b></p>
<p>The hierarchy is defined to some extent by the population figures. Some account needs to be taken of the residential developments at Burley and Menston and the subsequent impact on infrastructure demand.</p>	<p><b>Ilkley Civic Society</b></p>
<p>Yes</p>	<p><b>Ilkley Parish Council</b></p>

<p>The LDF Spatial Strategy supports future economic development in the Esholt area but limits residential development to meet local needs and support the economic development.</p> <p>It is considered that as the focus for economic development, the strategy should also seek to provide residential development to support the economic objectives to ensure sustainable development that reduced the need to travel in accordance with PPg13. Mixed use developments in accordance with PPS3 should also be considered with an emphasis on the development of brownfield sites.</p> <p>It is considered that the Esholt area provides a sustainable location for future development as demonstrated in the Airedale Masterplan. Existing train lines connecting Bradford and Leeds, and the Wharfedale Line and the existing road network provide good quality public transport facilities. The proximity of Leeds Bradford Airport at Yeadon is also important in providing national and international access with relation to the proposed economic development targeted at ICT industries and links to this should be encourages and improved given the lack of easy access to the motorway network.</p> <p>The Airedale Masterplan proposes a new railway station at Apperley Bridge in addition to proposed park and ride in the area. Proposals such as these further increase the sustainability of this area in the Aire Valley for mixed use development in the future. Moreover, in its long term interventions, the Masterplan refers to the Airport Rail Link which is an aspiration held beyond the Airedale Partnership, which would produce excellent linkages directly from the Airport down the Wharfedale and Airedale Lines to the Masterplan area generally.</p>	<p><b>KeyLand Development Ltd</b></p>
<p>In broad terms, the proposed settlement hierarchy is supported. It is accepted that the larger settlements in Airedale (i.e. Keighley/ Bingley/ Silsden) are well linked to Leeds and Bradford and can appropriately accommodate economic development. It is also accepted that some limited residential development could appropriately be directed towards these settlements. However, in order to avoid undermining the settlement hierarchy this should strictly be limited to that required meeting local needs. It is accepted that limited economic and residential development can appropriately be directed to within the larger settlements of Wharfedale (i.e. Ilkley/Burley/Menston) Residential development should strictly be limited to meet local needs</p>	<p><b>Miller Strategic Land</b></p>
<p>To prioritise development in the centre of the city and the Aire Valley is a mistaken strategy if other</p>	<p><b>Patchett Homes</b></p>

areas are excluded from development consideration	
The defined hierarchy seems appropriate but as stated above, clarification is needed as to the precise boundaries defining these areas.	<b>Redrow Homes</b>
<p>The defined hierarchy is not appropriate as it is not in accordance with the Policy YH8 of the emerging RSS. It is agreed that Bradford should be the focus for development. However, we consider that the regeneration and development focus for Airedale has not been translated through to the hierarchy. We believe that there needs to be an increased focus in accordance with Policy LCR1 and LCR2 of the emerging RSS, which identifies Airedale as a growth location. As such, the explanation for supporting the larger settlements in Airedale is unclear as it seems to suggest only allowing “limited residential development to meet local needs”, but then it also states that it will support “economic development objectives” and the “objectives of the growth area in the draft RSS”. This is confusing and it is clear that Airedale will be a growth area. As such it would provide more clarity if the definition only included reference to “growth locations”.</p> <p>Furthermore, the hierarchy does not include a reference to the smaller settlements in the Airedale Valley. The emerging RSS makes reference to the Principal and Local Service Centres in the Valley; we believe that there should be a reference in the hierarchy of these settlements including Riddlesden and Eastburn. These settlements in the Airedale Valley are in sustainable locations with services and facilities, and able to accommodate growth.</p>	<b>Taylor Woodrow</b>
The Assembly supports the proposed settlement hierarchy and development approach. However, on page 27 the Assembly does not support Options B – Dispersal of Growth or Option C – Focused Growth Poles as these options would not be in conformity with current or draft RSS. However, Growth Poles may be in conformity depending on location of the growth poles and evidence of inadequate capacity to meet all development needs in the sub regional Centre or principle service centres.	<b>Yorkshire and Humber Assembly</b>

<p><b>Q 2.6 SHOULD THE CITY OF BRADFORD BE THE FOCUS OF THE MAJORITY OF DEVELOPMENT?</b></p>	
<p>Arnold Laver is supportive of the focusing of the majority of new development in the plan area to the City of Bradford. This approach would be in line with the core principles of the emerging RSS, set out in Policies YH5-8, which seek to focus development in the main urban centres, including the ‘Sub-Regional Centre’ of the City of Bradford.</p> <p>Paragraph 5.11 of Topic Paper 2 sets out the proposed settlement hierarchy and development approach based upon locational principles of the RSS, stating that development is to be focused within Bradford City including Shipley and Baildon. Arnold Laver is in support of the majority of development/redevelopment being through increased densities and making effective use of previously-developed land.</p> <p>Arnold Laver would also like to see the Core Strategy promote the redevelopment of the strategic sites within Bradford which lie outside of the defined city centre but that are well related and connected to it</p>	<p><b>Arnold Laver</b></p>
<p>The City and notably the City Centre and Canal Corridor should be the focus of development.</p>	<p><b>Bradford Centre Regeneration</b></p>
<p>Bolsterstone Plc is supportive of the focusing of the majority of new development in the plan area to the City of Bradford. This approach would be in line with the core principles of the emerging RSS, set out in Policies YH5-8, which seek to focus development in the main urban centres, including the ‘Sub-Regional Centre’ of the City of Bradford.</p> <p>Paragraph 5.11 of Topic Paper 2 sets out the proposed settlement hierarchy and development approach based upon locational principles of the RSS, stating that development is to be focused within Bradford City including Shipley and Baildon. Bolsterstone Plc is in support of the majority of development/redevelopment being through increased densities and making effective use of previously-developed land.</p> <p>Bolsterstone would also like to see the Core Strategy promote the redevelopment of the strategic sites within Bradford which lie outside of the defined city centre but that are well related and connected to it</p>	<p><b>Bolsterstone Plc</b></p>
<p>The reference to ‘majority’ should be specified in % terms. Bradford needs to be careful not to make the same mistakes of Leeds and we suggest the % be no greater than 40%. Growth needs to be shared</p>	<p><b>Dacre, Son and Hartley</b></p>

across the district and particularly through the Aire Valley growth corridor. Housing supply needs to meet all market demands.	
Whilst it is accepted that Bradford should be the focus for the majority of development, the strategy needs to ensure that development and redevelopment proposals within the Shipley area will not have an adverse impact upon the character or setting of the world heritage site at Saltaire	<b>English Heritage</b>
The Core Strategy needs to take full account of PPS25 and should be informed by a Strategic Flood Risk Assessment to determine the location of development.	<b>Environment Agency</b>
We support the option of focusing the majority of new development over the LDF period on the city of Bradford, which includes the Allerton area. It is considered that focusing new development on the existing built-up part of the city represents the most sustainable option, particularly in terms of new house building given that significant existing supporting social and physical infrastructure is already in place.	<b>Hallam Land Management</b>
Yes. Development in the rural fringes of Bradford will not help to provide the additional housing needs of people in Bradford. Providing more housing to the north of Bradford will simply provide more opportunities for people to commute to Leeds or retire to the area.	<b>Ilkley Civic Society</b>
Yes	<b>Ilkley Parish Council</b>
In particular, the proposal to focus the majority of development and growth in and around Bradford is appropriate and in accordance with emerging RSS policy YH5, which seeks to deliver urban concentration. The proposal to position Bradford at the top of the settlement hierarchy is also consistent with the role of the city as a sub regional centre (as identified in the emerging RSS)	<b>Miller Strategic Land</b>
Is considered that, in the interests of sustainability and to meet regeneration objectives, the City of Bradford should be the focus for the majority of development. However this must not be to the extent that wider regeneration objectives for other parts of the District are damaged, in particular the Airedale Corridors Masterplan which is supportive of significant growth in Bingley and Keighley.	<b>Redrow Homes</b>

<p>The City of Bradford as the principal settlement in the District and a designated Sub-Regional Centre in the emerging RSS should be the focus for the majority of new development. However, its functionality should be supported through development in sustainable towns within the District.</p>	<p><b>Taylor Woodrow</b></p>
<p>Whilst we welcome in broad terms the spatial strategy outlined in option A (for the Bradford Urban area to be the focus of new growth) it is important to ensure that the distribution of development to other large settlements does not undermine the urban renaissance of Bradford. The appropriate implementation of Option A will provide vital support for the ongoing regeneration of Bradford, and in particular the programme to deliver four new public spaces in the city centre (the bowl, The Channel, The Market and The Valley) Whilst we consider it is appropriate that growth should be focused primarily on the main urban area, we also recognise that a limited amount of growth will be needed to support the needs of some outlying settlements as a means of ensuring their ongoing viability, or as a means of encouraging the regeneration of a settlement.</p>	<p><b>Yorkshire Forward</b></p>
<p>In the view of the Assembly the preferred option would be Option A – Regeneration and Selective Growth, which focuses development and redevelopment in the main urban area of Bradford.</p>	<p><b>Yorkshire and Humber Assembly</b></p>

Q 2.7 WHAT SHOULD BE THE ROLE OF LOWER ORDER SETTLEMENTS?	
<p>There should be limited development in the well located villages will assist in creating sustainable communities rather than just dormitory villages for the larger urban areas.</p>	<p><b>Airedale Partnership</b></p>
<p>As mentioned in our comments to Question 2.3 above, we feel that the longer-term development needs of the so called 'lower order settlements' should be given greater support by the Core Strategy give the valuable role that they provide communities.</p> <p>The existing development of the RUDP allows only limited new development to meet local needs in these settlements. We do not support the retention of this strategy.</p> <p>As mentioned, high quality development opportunities may present themselves within these settlements which could make a valuable contribution towards meeting future housing and employment needs. These settlements often have an important role as Local Services Centre, offering a supporting role to a wider area.</p> <p>Furthermore, important opportunities are likely to arise which allow these settlements to grow in a sustainable manner within existing settlement limits through the identification and release of new sites by the LDF, particularly where proposals for a mix of housing and employment in close proximity can be achieved (see paragraph 3 of PPS7 earlier). In these circumstances there should be sufficient flexibility within the Core Strategy to allow the positive role of some lower order settlements to be supported.</p> <p>We note the advice of PPS3 at paragraph 37 on this matter, which states:  "Where need and demand is high, it will be necessary to identify and explore a range of options for distributing housing, including consideration of the role of growth areas, growth point, new free standing settlements, major urban extensions and <b>the managed growth of settlements</b> in both urban and <b>rural areas and/or where necessary, review of any policy constraints.</b>"</p> <p>It is clear therefore that up-to-date national policy on housing allows for the future managed growth of some rural settlements. Fundamentally, PPS3 also calls for a <u>review of policy</u> in order to allow this to happen. We therefore strongly support such recognition within the Core Strategy as it represents a vehicle for such review and can allow for the future growth of certain settlements, including Cullingworth.</p>	<p><b>Commercial Estates</b></p>

<p>The role and function of each settlement should be the subject of a separate evidence based topic paper founded upon the most up to date employment growth forecasts, household formation and housing needs, environmental constraints and infrastructure constraints – this is currently absent from the evidence base.</p>	<p><b>Dacre, Son and Hartley</b></p>
<p>To meet the needs of residents</p>	<p><b>Ilkley Parish Council</b></p>
<p>Development in less well located and lower order settlements should be restricted to that which is essential to meeting local needs and regeneration objectives.</p>	<p><b>Miller Strategic Land</b></p>
<p>The lower order settlements should be allowed to accommodate an appropriate level of growth depending on their relative sustainability, accessibility and potential contribution to regeneration objectives.</p> <p>The larger settlements in Airedale are all very well connected within a high quality transport corridor linking both Leeds and Bradford. The Core Strategy suggests that these settlements should be the focus for economic development as they form part of the Airedale Corridors Masterplan area. It is likely that in order to facilitate significant economic development in this part of the District, a complimentary level of housing growth will also be necessary or else unsustainable travel patterns could result from significant numbers of workers travelling by car from outside the District. The Core Strategy states that only limited residential development to meet local needs should be allowed which is at odds with the objective of encouraging economic growth.</p> <p>Care must also be taken in the approach to allowing development in some of the smaller settlements. Cottingley, for instance, actually falls within the Airedale Corridors Masterplan area and is served by a Bus Priority Network. It is also approximately 2km from Shipley town centre and 1km from Bingley town centre. Cottingley functions as part of a well connected, wider Airedale Corridor. This suggests that Cottingley would potentially be suitable for some growth to support regeneration/economic objectives.</p>	<p><b>Redrow Homes</b></p>
<p>In accordance with PPS7, the lower order settlement should support the functionality of the higher order settlements and be allowed development in order to retain their identity, meet local and District growth, and remain self-sustainable. Some development will be required to enhance their role in the District and assist with retaining services.</p>	<p><b>Taylor Woodrow</b></p>

<b>Q 2.8: WHAT FACTORS SHOULD BE USED TO SELECT THOSE SETTLEMENTS AND VILLAGES TO BE IDENTIFIED FOR FUTURE DEVELOPMENT?</b>	
The role and function of each settlement should be the subject of a separate evidence based topic paper founded upon the most up to date employment growth forecasts, household formation and housing needs, environmental constraints and infrastructure constraints – this is currently absent from the evidence base.	<b>Dacre, Son and Hartley</b>
<p>In view of the recognition of the importance of a high quality environment to the future well-being of the district, the procedure for selecting settlements for potential development should include an assessment of the capacity of each of those settlements to accommodate further growth without compromising either their historic character or their wider landscape setting. The council has already undertaken a considerable amount of research which can feed into this process including</p> <ol style="list-style-type: none"> <li>1. The recently completed conservation area appraisals- which can be used to help determine the likely scale and development of any development in that settlement.</li> <li>2. The Saltaire capacity study- which can be used to help inform decisions about future development within the Shipley/Baildon area.</li> <li>3. The landscape character assessment. This could be supplemented by the work which is commencing on historic landscape characterisation which is due to be undertaken by WYAS</li> </ol>	<b>English Heritage</b>
The Core Strategy should take full account on PPS25 and be informed by a Strategic Flood Risk Assessment when determining the location of development.	<b>Environment Agency</b>
Future development should make use of available derelict and underused property, including where sensitive and appropriate, the alternative use of farm buildings no longer required for agriculture i.e. allowing for diversification into tourism/residential. There should be a demonstrated local need for any further housing in rural areas.	<b>Ilkley Civic Society</b>
Local needs and suitable available land within the boundaries	<b>Ilkley Parish Council</b>
<p>The factors that should be used to select settlements for future development are as follows:</p> <ul style="list-style-type: none"> <li>• Information about the existing size and scale of each settlement. This is a useful benchmark for assessing the relative scale of development. This could either be carried out on the basis of the</li> </ul>	<b>Redrow Homes</b>

- number of dwellings within each defined settlement or alternatively on the basis of its population;
- The availability/deliverability of suitable sites for development within or at the edge of each settlement. Sites to be considered should be assessed on the basis of their relative sustainability and this must also include suitable greenfield sites which will be required to meet RSS housing targets;
  - The relative accessibility of settlements by modes of transport other than the car;
  - Anticipated levels of regeneration/economic growth, most notably in relation to settlements in the Airedale Corridor (Shipley/Bingley/Keighley);
  - Evidence of current and future levels of need and demand for housing in each settlement;
  - The availability and capacity of, and accessibility to, existing major strategic infrastructure and/or feasibility of delivering the required level of new infrastructure;
  - The need to create and maintain sustainable, mixed and inclusive communities in all areas, both urban and rural; and
  - The need for affordable housing in each settlement.

The suggested spatial strategy is broadly considered acceptable, subject to the comments above. However there are also some notable merits to elements of the other suggested growth options. Option A in particular recognises the importance of allowing increased development in some of the lower order settlements with good public transport/infrastructure (or where they may be improved) and making use of existing safeguarded land on the edge of settlements. Where previously developed land performs poorly in terms of sustainability/deliverability in comparison to greenfield sites (such as some of the safeguarded land at the edge of settlements) then some safeguarded land must be considered for release.

In this regard it would be negligent of the Council to rule out the need for some release of greenbelt sites for development over the plan period. There are examples of greenbelt sites around the urban areas, which could be argued not to perform key greenbelt functions and could be released for development. Should the supply of previously developed land in the District, that is genuinely deliverable, prove to be insufficient to meet RSS housing targets, then a selective review of greenbelt boundaries should not be ruled out.

<p>The location of designated wildlife sites within and adjacent to a particular settlement should be a key consideration in deciding which settlements should have additional development. New development should also be sited in settlements where there is sufficient transport capacity, particularly public transport, to support growth, and where there is enough community infrastructures to prevent additional car journeys.</p>	<p><b>RSPB</b></p>
<p>Factors should include the levels of services and facilities available, such as schools, public transport and local community and social provision. It should not be based on population size but the functionality of the settlement and the role it plays in its environs. This could be in supporting the function of a nearby larger settlement and therefore some level development should be deemed appropriate.</p>	<p><b>Taylor Woodrow</b></p>

<b>Q 2.9: WHAT IS THE ROLE OF THE CENTRES?</b>	
The Airedale Masterplan identifies a number of distinct roles for each of the three major towns of Keighley, Bingley and Shipley; Keighley being a town of heritage and innovation, Bingley a distinctive market town with a creative edge and Shipley an international gateway to Airedale.	<b>Airedale Partnership</b>
The role and function of each settlement should be the subject of a separate evidence based topic paper founded upon the most up to date employment growth forecasts, household formation and housing needs, environmental constraints and infrastructure constraints – this is currently absent from the evidence base. The document fails to recognise areas of growth for employment and housing.	<b>Dacre, Son and Hartley</b>
The future role of those centres which are not successful is governed by their ability to change. Those centres which are struggling to survive on the commercial front will need additional support (Shipley, Bingley?)The LDF needs to encompass making these places more attractive places to live in order that there is local investment in infrastructure.	<b>Ilkley Civic Society</b>
To support the core needs of the outlying areas	<b>Ilkley Parish Council</b>
This question is particularly unclear and highlights the issue with the term “centres”. This issue was discussed at the recent RSS EiP where it transpired that the term “centres” in the RSS means the entirety of a built up area/urban area and not just the town or city centre. As such, the centres identified in the RSS Bradford, Keighley and Ilkley should be identified in the hierarchy as they will play an important role in the future growth of the District and the Region with services and facilities available and therefore able to accommodate development either within or on the edge of the urban area. Bradford should be identified as a Sub-Regional Centre, whilst Keighley and Ilkley are Principle Service Centres.	<b>Taylor Woodrow</b>

<b>Q 2.10: WHAT INFRASTRUCTURE REQUIREMENTS ARE NEEDED TO DELIVER THE ABOVE APPROACH?</b>	
<p>The provision of appropriate infrastructure is key to this approach. The Airedale Masterplan identifies a number of key infrastructure projects, notably the Shipley Eastern Link Road and the dualling of Hard Ings in Keighley plus long term improvements to address congestion in the Shipley/Saltaire area. The Masterplan also suggests continued investment in the public transport network to improve the quality of the railway stations in Airedale, improve bus/rail interchanges and the development of a rail link to Leeds Bradford Airport. The Masterplan also identified the need to increase the opportunity to walk and cycle through the development of the Airedale Greenway.</p>	<b>Airedale Partnership</b>
<p>A greater focus should be given to transport infrastructure in support of the City. Finally, Option C, “Focused Growth Poles” should be seen as the preferred option with explicit recognition given to the City Centre</p>	<b>Bradford Centre Regeneration</b>
<p>Infrastructure shortfalls are outlined in the more recent Leeds City Region submission (November 2006) and Replacement UDP.</p> <p>Paragraph 5.13 states paragraph 5.10 of the Topic Paper sets out the core approach derived from emerging RSS. This is not correct, paragraph 5.4 sets out emerging RSS and this is not reflected in paragraph 5.10. ‘Growth Areas’ and ‘Ilkley’ appear to become taboo subjects in Topic Paper 2.</p> <ul style="list-style-type: none"> <li>• Option A does not reflect draft RSS but is perhaps the closest of all three options. % splits for locations would have assisted.</li> <li>• Option B does not reflect draft RSS.</li> <li>• Option C does not reflect draft RSS but is worthy of further consideration.</li> </ul> <p>We are concerned that Options A, B and C appear to be founded on a weak evidence base which could generate a false set of unjustified Issues and Options that could constrain proper consultation and raise procedural issues under PPS12 soundness ‘test vii’.</p>	<b>Dacre, Son and Hartley</b>
<p>Dependent on the sites identified and their location and specific flood risks, it is possible that flood defenses may be required. At this stage it is not possible for use to be more specific.</p>	<b>Environment Agency</b>

Better quality retail, more good design of town centre buildings, proper arts/leisure facilities, more residential development close to the centre. An integrated approach to traffic management and parking which puts the pedestrian first in specific areas.	<b>Ilkley Civic Society</b>
Schools, doctors/dentists. Transport, small employment units to service local area (joiner/plumber/electrician)	<b>Ilkley Parish Council</b>
The infrastructure required to deliver the spatial approach from Natural England's perspective are Green infrastructure corridors and public transport facilities to access the rural areas and countryside around town	<b>Natural England</b>
<p>The emerging RSS is to focus a high proportion of future growth in West Yorkshire and we support the ethos of locating development in areas with good public transport linkages and increasing densities to appropriate levels in accessible locations. Nevertheless, this scenario must be evidence based and include information on growth zones such as land availability, deliverability and transport constraints.</p> <p>The Core Strategy needs to take account of regional infrastructure investment decisions. We suggest that looking at alternatives modes of transport to resolve transport issues, such as maximising use of all public transport corridors, including all railway corridors and road corridors, and identifying areas for potential developments and improvements based on the availability of either existing facilities or locations that could be improved e.g. new railway stations.</p> <p>This work should feed into the Issues and Options Paper and be part of a sound evidence base on transport constraints, land availability and growth areas up to 2025.</p>	<b>Taylor Woodrow</b>
Infrastructure needs to be in place to service new development and YW aims to meet this demand for water, sewerage and waste water treatment services by the most timely and effective means. PPS12, Paragraph B4, states that it is an important purpose of the planning system to co-ordinate new development with the infrastructure it demands. Regional Planning Guidance for Yorkshire and the Humber (RPG12) states that the ability to provide adequate sewerage and waste water treatment/disposal capacity before developments become operational is most important.	<b>Yorkshire Water</b>

Under the terms of the Water Industry Act 1991, where there is insufficient water or sewerage infrastructure in place to serve a development, subject to certain qualifications, a water main or a sewer for domestic purposes (including the domestic element of non-residential uses) can be requisitioned. In most cases, the requisition route ensures that capacity in mains and sewers required for new development can be provided in accordance with the developer's timetable.

However, there are elements of water and waste water infrastructure which cannot be requisitioned. Most notably, a developer cannot requisition capacity at a waste water treatment works. Whilst YW aims to allow for future population growth and ensure that sufficient capacity does exist at its waste water treatment works when carrying out improvements, it is difficult to do this without a clear indication of development capacity in the catchment served by the works.

Yorkshire Water has adopted a policy whereby, if it does not have existing capacity to accommodate the demand generated by a development, we will only object to planning permission for development:

- where there is insufficient infrastructure (including waste water treatment) capacity which cannot be overcome by a requisition;
- when there is no reasonable prospect of the capacity being provided within three years (five years in the case of an outline application).

In most cases we will recommend planning conditions to preclude development until such time as adequate infrastructure capacity has been provided. We will undertake to carry out works to provide the necessary capacity subject to being satisfied that there is a measure of commitment to undertake the development based on dialogue with the developer in each particular case.

To ensure that development which takes place is sustainable, we would support the inclusion of a policy in the plan which ensures that new development is co-ordinated with the provision of essential infrastructure. Infrastructure for the supply of clean water and disposal and treatment of waste water should be listed as essential infrastructure. This would set out the need to investigate the existing infrastructure capacity of their sites at an early stage in the development process and improve the co-ordination of infrastructure and development. An example policy is set out below:

Development will not be permitted unless infrastructure required to service the development is available or the provision of infrastructure can be co-ordinated to meet the demand generated by the new development

<b>Q 2.11: WHAT ARE THE BENEFITS/DISADVANTAGES OF THE ALTERNATIVE OPTIONS?</b>	
<p>Although the core approach outlined in Para 5.10 in the consultation is supported there needs to flexibility to respond to changing economic circumstances and the needs of the wider City Region and Regional Economy. This would suggest that there may be a need to identified a growth node (Option C) which could accommodate future strategic development needs or a major investment of City Region or Regional significance. The Masterplan identifies the redevelopment of the Esholt treatment works as a special research and development park to support the creative and digital sector in the Leeds City Region. Any development within this node should be of the highest quality, should only be available for development if it could be demonstrated that that such development could not be accommodated within the principal urban centres of the District and be shown to be of City Region or Regional significance.</p>	<b>Airedale Partnership</b>
<p>We support a combination of options A and C whereby the focus of the majority of new development is main urban area of Bradford which includes Allerton. We do not offer support for any increased distribution of development to other selective larger settlements in the district. In this regard, the quantity of new development should reflect the current size and status of individual settlements within the core strategy's settlement hierarchy. We reiterate our view that focusing new development on Bradford city is the most sustainable and most supportive of and complementary to regeneration initiatives. We offer support for option C where it involves the identification of 'growth poles' for significant new development on the edge of Bradford city , such as Allerton, to accommodate growth that cannot be accommodated in the existing urban area to ensure an appropriate range of housing sites are allocated to provide an appropriate range of house types. In this regard we note that the publication of PPS3 in November 2006 abolished the previous sequential approach of PPG3 in respect of identifying new housing sites. This means that there is no longer an explicit national policy requirement to rule out previously developed sources of housing supply before a particular Greenfield site can be allocated, or indeed released, for housing.</p>	<b>Hallam Land Management</b>
<p>The rural green belt of the Bradford area is one of our greatest assets. My concern is that the development on safeguarded land proposed in option A, and to some extent options B and C will result in the erosion of the separation between the various settlements. This will lead to the loss of individual identity of the towns and villages, and the gradual merging of the settlements into one large suburban area. The resulting requirement for infrastructure upgrading would only add to the urbanisation</p>	<b>H. Bosomworth</b>

<p>It is the Council's duty to outline these benefits/disadvantages and these need to include an assessment of deliverability.</p>	<p><b>Dacre, Son and Hartley</b></p>
<p>None of the options is satisfactory. All three include implications for development at the edge of settlements or green belt. There are settlements where there is no land left without demolition of existing sustainable property.</p>	<p><b>Ilkley Civic Society</b></p>
<p>Disadvantages: Possible effect on green belt areas with good transport links could become dormitory towns  Advantages: Regeneration of city centres, in migration to centre such as Ilkley should only occur where absolutely necessary, not as a right.</p>	<p><b>Ilkley Parish Council</b></p>
<p>With regard to the alternative options presented at paragraph 5.13 of the document, it is considered that these would cause conflict with the spatial strategy and settlement hierarchy established through the emerging RSS. It is considered that the core approach set out at paragraphs 5.10-5.12 of the topic paper (as referred to above) remains the most appropriate option and will result in the most sustainable pattern of development.</p>	<p><b>Miller Strategic Land</b></p>
<p>We believe that the best scenario proposed in the Issues and Options Paper is Option A – Regeneration and Selective Growth. This scenario supports the renaissance of Bradford but also acknowledges that larger settlements in the District have a role to play in the growth of the District and the Region. The benefits of this scenario are that it would, in accordance with PPS3, allow a wider choice of housing locations and bring higher levels of investment into the District.</p> <p>We believe that Option C – Focused Growth Poles is similar in nature to Option A, albeit with a reduced focus on the Major Urban Area. As such, focusing growth on larger sustainable settlements accessible by a variety of modes of transport is supported.</p> <p>Option B – Dispersal of Growth is considered to be unsustainable and could have significant adverse impacts on the District. Dispersing growth to all settlements would increase the need to travel and could allow significant developments on the edge of small villages, which would be out of character with the surrounding area.</p>	<p><b>Taylor Woodrow</b></p>

<b>Q 2.12 'WHAT OTHER OPTIONS ARE THERE TO DELIVER THE VISION?'</b>	
<p>In order to enable the successful regeneration of Bradford City, the Core Strategy should seek to promote mixed use development and avoid the designation of sites for single uses. This will enable the development of communities rather than areas that are in use for set purposes and at certain times of the day.</p> <p>Arnold Laver is in support of the promotion of mixed-use development within Bradford to enable the proposed growth set out in the emerging RSS.</p> <p>In order for this to take place, it is suggested that the Bradford Core Strategy promote sites close to the designated city centre for a mix of uses, to include employment, residential and retail uses, and thus reducing the reliance on windfall sites. This approach would be in compliance with the objectives of the emerging RSS, which seeks to give priority first to the use of previously developed land and buildings followed by suitable infill opportunities.</p>	<b>Arnold Laver</b>
<p>In order to enable the successful regeneration of Bradford City, the Core Strategy should seek to promote mixed use development and avoid the designation of sites for single uses. This will enable the development of communities rather than areas that are in use for set purposes and at certain times of the day.</p> <p>Bolsterstone Plc is in support of the promotion of mixed-use development within Bradford to enable the proposed growth set out in the emerging RSS.</p> <p>In order for this to take place, it is suggested that the Bradford Core Strategy promote sites close to the designated city centre for a mix of uses, to include employment, residential and retail uses, and thus reducing the reliance on windfall sites. This approach would be in compliance with the objectives of the emerging RSS, which seeks to give priority first to the use of previously developed land and buildings followed by suitable infill opportunities.</p>	<b>Bolsterstone Plc</b>
<p>The role and function of each settlement should be the subject of a separate evidence based topic paper founded upon the most up to date employment growth forecasts, household formation and housing needs, environmental constraints and infrastructure constraints – this is currently absent from</p>	<b>Dacre, Son and Hartley</b>

<p>the evidence base. The document fails to recognise areas of growth for employment and housing.</p>	
<p>Compulsory purchase and redevelopment of large tracts of derelict industrial/warehouse land In urban areas. Incentives to developers to take on 'difficult' properties i.e. urban sites with 'negative land values'. This may require a systematic survey of previously mined land throughout the Bradford District where subsidence could be a problem.</p>	<p><b>Ilkley Civic Society</b></p>
<p>The option we support is similar to that which is already proposed but refined to engender an ethos of regeneration and growth. The focus should be on Bradford Urban Area, but with an encouragement to regenerate and also expand along sustainable transport corridors, such as northwards at Thackley and Shipley and south along the M606 at Oakenshaw. Allowing the Urban Area to grow would assist with the economic development of the District by drawing in and supporting higher levels of investment.</p> <p>Similarly, the RSS encourages the regeneration of the Airedale Valley from Shipley to Skipton. Therefore, the chosen option should look to recreate such a scenario. Although we agree that the majority of development in the Airedale Valley should be focused on the larger more sustainable settlements such as Keighley and Silsden, some development should be focused on smaller settlements such as Eastburn and Riddlesden. This would allow for a widespread renaissance of the Airedale Valley with the benefits being felt throughout the area, rather than just focusing on the larger settlements.</p>	<p><b>Taylor Woodrow</b></p>





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