

Local Plan for the Bradford District

Core Strategy

**Statement of Pre-Consultation:
Further Engagement Draft**

October 2013

FOREWORD

This Statement of Pre-Submission Consultation relates to the public consultation that was carried out on the Further Engagement Draft stage of the Core Strategy Development Plan Document (DPD) in 2011 and the responses gained as a result.

The Further Engagement Draft consultation formed the third round of public consultation during the preparation of the Core Strategy DPD. The consultation sought to involve interested parties and stakeholders in a discussion relating to the proposed strategy and approach put forward by the Council.

The Further Engagement Draft consultation follows on from the earlier Issues and Options (2007) and Further Issues and Options (2008) public consultations on the Core Strategy. The Issues and Options Statement of Pre-Submission Statement (2011) provides a link between the issues raised and how these have been taken into consideration and addressed in the Further Engagement Draft document.

This report should be considered as an addendum to the Statement of Pre-Submission Consultation: Issues and Options Stage (2011) report. These reports outline the nature of the consultations which have taken place during the preparation of the Core Strategy DPD, in accordance with the relevant planning regulations.

Further Information

For more information about the Core Strategy or the Local Plan for Bradford, please contact the Local Plan Group at:

Post: Local Plan Group
2nd Floor South, Jacobs Well
Manchester Road
BRADFORD
BD1 5RW

Telephone: (01274) 433679

Email: **ldf.consultation@bradford.gov.uk**

Website: **www.bradford.gov.uk/LDF**

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1.0 INTRODUCTION & BACKGROUND

- 1.1 The Planning and Compulsory Purchase Act 2004 brought about a major change to the planning system, in particular to planning policy and how development plans are to be prepared. This means that the adopted Replacement Unitary Development Plan (RUDP) (2005) will, in time, be replaced by the Local Development Framework (LDF). When preparing documents which will form part of the LDF, the Council must carry out public consultation and engage with local communities and stakeholders in order to gauge views on the plan and its soundness. The minimum requirements which all authorities must achieve are set out within the planning regulations.
- 1.2 Authorities are also required to prepare and publish a Statement of Community Involvement (SCI) which explains when and how any public consultations will take place, whom will be consulted and what will be done to engage with the community at each stage of the consultation process and also within planning applications. The Council is fully committed to community engagement in the delivery of local services and functions. The SCI for Bradford was adopted by the Council on 8th July 2008.

Purpose of this document

- 1.3 When submitting Local Development Document (LDDs) to the Secretary of State for approval, local authorities must include a Pre-Submission Consultation Statement to demonstrate how consultation has been undertaken during the plan preparation process and how this complies with the minimum requirements of the regulations and the Council's adopted SCI.
- 1.4 This Statement of Pre-Submission Consultation report sets out how Bradford Council has involved the community and key stakeholders in the preparation of the Core Strategy Development Plan Document (DPD) Further Engagement Draft consultation document. It sets out what was done to consult the different organisations, agencies, and residents of the District, how this met the requirements of the regulations and how it complies with the Council's adopted Statement of Community Involvement. It also describes how the results of the consultations have been taken into account in the stages of preparing the next stage of the plan – the Publication Draft report.
- 1.5 This report will outline how the Further Engagement Draft consultation complies with the relevant regulations as set out within the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended 2008). These regulations are listed below:

- Regulation 25 - Public participation in the preparation of a development plan document
- Regulation 28 – Representations relating to a development plan document
- Regulation 30 – Submission of documents and information to Secretary of State

1.6 This report has been prepared to provide a formal record of the consultation which has taken place and to accord with Regulation 30 ‘Submission of documents and information to Secretary of State’.¹ Regulation 30 requires the submission of a DPD to be accompanied by a statement pursuant to Regulation 25, setting out the following:

- | | | |
|----|-------------------------------------|-------------------------------------|
| a. | Those bodies consulted | <i>See Appendix 1</i> |
| b. | How those bodies were consulted | <i>Section 2.0 & Appendix 2</i> |
| c. | A summary of the main issues raised | <i>See Appendix 6</i> |
| d. | How the issues have been addressed | <i>See Appendix 6</i> |

1.7 In addition, Regulation 30(1) requires a statement regarding all the representations which were made under Regulation 28(2) in respect of the Further Engagement Draft stage. This statement sets out the following:

- | | | |
|----|---|------------------------|
| a. | The number of representations made | <i>See Section 3.0</i> |
| b. | A summary of the main issues raised by the representations | <i>See Appendix 6</i> |
| c. | How the main issues have been taken into account in the DPD | <i>See Appendix 6</i> |

BACKGROUND TO THE LOCAL DEVELOPMENT FRAMEWORK

What is a Local Development Framework (LDF)?

1.8 Development within the Bradford District is currently controlled by the Replacement Unitary Development Plan (rUDP), adopted in October 2005.

1.9 The Planning and Compulsory Purchase Act 2004 required local authorities to replace their current development plans with a new type of plan called a Local Development Framework (LDF). The Local Development Scheme (LDS) provides a starting point for the local community and the stakeholders to find out what planning policies and proposals (Local Development Documents) the Council intends to produce as part of the LDF.

¹ Town and Country Planning (Local Development) (England) Regulations 2004 (as amended in 2008)

Core Strategy Development Plan Document (DPD)

- 1.10 The Core Strategy DPD is a key planning document that will show broad areas for growth and restraint, and will set out the role that different areas of the District will have until 2028. It will set the long term spatial vision for the District and strategic policies to deliver the vision.
- 1.11 There are a number of stages within the preparation of the Core Strategy; these are highlighted in the list below². Bradford Council has undertaken additional public consultation stages on the Core Strategy to ensure that a robust and sound plan is developed.
- 1 Pre-production scoping and evidence gathering
 - 2 **Consultation on Issues and Options (2007)**
 - 3 **Consultation on Further Issues and Options (2008)**
 - 4 **Consultation on Further Engagement Draft (2011)**
 - 5 **Consultation on Publication Draft (TBC)**
 - 6 Submission to Secretary of State
 - 7 Examination
 - 8 Adoption following a binding Inspectors report.
- 1.12 Following consultation at the Issues and Options stage in 2007, Bradford Council decided to undertake further consultation at this stage to teeth out further issues faced by the District and several options. These consultation periods have been termed the 'Further Issues and Options' stage. The details and outcomes of these consultations are outlined within a separate Statement of Pre-Submission Consultation: Issues and Options stage (2011).

Statement of Community Involvement (SCI)

- 1.13 The Statement of Community Involvement (SCI) sets out how the Council intends to engage the community in producing Local Development Documents that make up the Local Development Framework, and in the consideration of planning applications. The SCI is itself a Local Development Document that is the subject of a Public Examination by an independent Inspector. Once adopted, all other LDD's will have to comply with the requirements for community involvement set out in the adopted SCI. The SCI was adopted by the Council on 8th July 2008.

² Town and County Planning (Local Development) (England) Regulations 2004 (amended 2008 and 2009)

- 1.14 This report will set out how the Council has consulted the public and stakeholders on the Further Engagement Draft stage of the Core Strategy, in accordance with the Statement of Community Involvement.

Planning Aid England

- 1.15 The SCI identifies Planning Aid England (formally Yorkshire Planning Aid) as a means by which a partnership can be formed to increase local community involvement in the preparation of the Council's development plans and policies.
- 1.16 Planning Aid England (PAE) provide free, independent and professional town planning advice and support to communities, individuals and groups within England who cannot afford professional fees. PAE is part of a network of nine Planning Aid services throughout the country, all of which are part of the Royal Town Planning Institute (RTPI), a Registered Charity. Local services operate through a Community Outreach Coordinator and network of professional qualified volunteers. Their work complements the work of local planning authorities, but is wholly independent of them. PAE helps to meet one of the key aims of the government's planning reform agenda, which is to place community engagement and community planning at the heart of the planning system.
- 1.17 Bradford Council is working in partnership with Planning Aid England (Central East region) on the Core Strategy to seek to engage with disadvantaged communities and with groups which represent or work with people who need support and guidance in order to get involved with the planning system, for example young people, people with disabilities, or people from ethnic minority communities. These consultations are highlighted in the relevant sections within in this report.
- 1.18 Details of the consultations undertaken by Planning Aid England have been recorded in a separate consultation event log which is available alongside this report.

2.0 METHODS OF CONSULTATION & EVENTS PROGRAMME

- 2.0.1 The Further Engagement Draft consultation document presented a proposed draft Core Strategy, with strategic policies, for public consultation. It was the intention of the Council to seek the views of key stakeholders, community groups and residents with regards to the adopted approach, the content, the policies, along with the evidence base which supported the draft plan. Any comments received would then shape the Publication Draft.
- 2.0.2 The Further Engagement Draft document was taken to the Regeneration and Economy Scrutiny Committee on Thursday 29th September 2011. It was then referred to the Council's Executive Committee for approval for public consultation Friday 14th October 2011.
- 2.0.3 In line with the requirements of the planning regulations, Bradford Council undertook a planned twelve week public consultation on the Further Engagement Draft from Friday 28th October 2011 until Friday 20th January 2012.
- 2.0.4 Following a Motion to Council on 13th December 2011, a decision was made to extend the consultation deadline to allow more time for comments to be submitted to the Council. The consultation deadline was extended to 4pm on Wednesday 29th February 2012. The consultation period lasted for approximately 18 weeks in total.

2.1 Consultation and Supporting Documents

- 2.1.1 The following documents were produced and made available for the Further Engagement Draft consultation:
- Engagement Plan (2011)
 - **Further Engagement Draft (2011)**
 - Initial Sustainability Appraisal (2009)
 - Interim Sustainability Appraisal (2011)
 - Equality Impact Assessment (2011)
 - Statement of Consultation: Issues and Options Stage (2011)
- 2.1.2 Copies of the key consultation documents were placed for inspection at the following **deposit locations** listed below. Notifications of these locations were given in the consultation letter and on the LDF website.
- At Planning Offices in Bradford (Jacobs Well) and Ilkley Town Hall.
 - At Council One Stop Shops at Shipley and Keighley.

Statement of Pre-Submission Consultation

- In the main local libraries in Bradford, Shipley, Bingley, Keighley and Ilkley.

Evidence Base & Supporting Documents

2.1.3 In addition to the above consultation documents, the following reports which form part of the LDF's evidence base were made publically available on the Council's LDF webpages:

- Affordable Housing Economic Viability Assessment (AHEVA) (2010)
- Bradford District Retail Study (2008)
- Core Strategy DPD: Baseline Analysis Study (2011)
- District Wide Transport Study (2010)
- Employment Land Review (2008)
- Employment Land Review Update (2011)
- Gypsy and Traveller Accommodation Assessment
- Local Economic Assessment (2010)
- Local Infrastructure Plan (2011)
- Open Space & Recreation Study (2006)
- Settlement Study Update (2011)
- Strategic Housing Land Availability Assessment (2011)
- Strategic Housing Market assessment (2010)

Summary Leaflet

2.1.4 A summary leaflet was produced to provide a concise and informative overview of the information presented in the Further Engagement Draft document.

2.1.5 The summary leaflet was used extensively throughout the consultation period, it was:

- Made available at Planning Offices and libraries for the public to pick up;
- Made available to delegates at each of the six technical events;
- Made available to members of the public at the area 'drop-in' events;
- Sent to Parish and Town Councils;
- Sent out to members of the public upon request;
- Available on the Council's LDF web pages for viewing and downloading;
- Handed out at a number of Neighbourhood Forums by Area Coordinators.

LDF Information Leaflets

2.1.6 Information leaflets which had previously been produced for earlier consultations were updated, re-printed and distributed to facilitate people’s understanding of the context of the consultation. These leaflets included:

- A Guide to the Planning System
- A Guide to the Core strategy
- Jargon Buster

2.2 Who was consulted?

2.2.1 Approximately 1,500 stakeholders, members, groups and individuals were invited to make comments to the consultation documents outlined above. The table below indicates those persons or bodies that were consulted. These are organised in line with the SCI. A full list of all those consulted can be found in Appendix 1.

| SCI Consultees List | Total Number of Consultees | No. of Letters Sent | No. of Emails Sent |
|--------------------------------------|----------------------------|---------------------|--------------------|
| SCI 1 - Statutory | 83 | 83 | 67 |
| SCI 2 - General | 377 | 377 | 90 |
| SCI 3 - Other | 73 | 73 | 29 |
| SCI 3 - Other M&W | 45 | 45 | 1 |
| SCI 4 - Councillors & MPs | 95 | 0 | 95 |
| SCI 4 - Notification Request – Email | 247 | 0 | 247 |
| SCI 4 - Notification Request | 178 | 73 | 105 |
| SCI 4 - LDF Newsletter | 367 | 0 | 367 |
| TOTAL | 1465 | 651 | 1001 |

2.2.2 Prior to the public consultation, a series of **Member Briefings** were arranged with each of the political parties and lead officers within the Council to outline the nature of the LDF for Bradford, to explain what the Core Strategy is and to introduce the consultation documents prior to an Executive Meeting.

| Date | Time | Party / Group | Venue |
|-----------------------------|------------|---|---------------------|
| 22 nd March 2011 | 6 – 8pm | Member Training Event | City Hall, Bradford |
| 17 th June 2011 | 9 – 9.30am | Chief Executive and Leader of the Council | City Hall, Bradford |

| | | | |
|---------------------------------|---------------|--|--------------------------|
| 17 th June 2011 | 9.30 - 11 am | Portfolio Holders | City Hall, Bradford |
| 23 rd August 2011 | 13.00 – 15.00 | Cllr Val Slater (Labour) | Jacobs Well, Bradford |
| 5 th September 2011 | 18.00 – 20.00 | Labour Group Briefing | City Hall, Bradford |
| 19 th September 2011 | 12.00 – 12.30 | Green Party Briefing - Cllr Love | City Hall, Bradford |
| 20 th September 2011 | 10.30 – 12.00 | Conservative Briefing - Cllr Palmer; Cllr Cooke, Cllr Miller, Cllr Pennington | City Hall, Bradford |
| 20 th September 2011 | 13.00 – 18.00 | LDF Drop-in Briefing All Members | City Hall, Bradford |
| 29 th September 2011 | 17.30 | Regeneration and Economy Overview Committee | City Hall, Bradford |
| 10 th October 2011 | 18.00 - 18.30 | Conservative Group Briefing | City Hall, Bradford |
| 12 th October 2011 | 14.00 - 14.30 | Cllr Kelly Addingham | Jacobs Well, Bradford |
| 14 th October 2011 | 10.30 | Executive Committee | City Hall, Bradford |

2.3 How the public and other stakeholders were consulted

- 2.3.1 The Council used a number of different methods of community consultation and engagement which aimed to reach the different groups within the community. The ranges of methods used are outlined below:
- 2.3.2 A total of 1,791 **written notifications** were sent out on Friday 28th October 2011, either by letter or by email, to individuals, community groups, developers, agents and infrastructure providers in line with the SCI, notifying them of the consultation, how to view the documents and inviting them to make comments before the set deadline. A sample of the letter can be found in Appendix 2.

2.3.3 The table below provides a summary of how was consulted and by what means. Appendix 1 provides a list of all those who were directly consulted at this stage.

| LINKS TO SCI | CONSULTEE | METHOD OF NOTIFICATION |
|--|---|------------------------|
| 1. Specific Consultation Bodies | Statutory Bodies | ▪ Letter & CD |
| | Town & Parish Councils | ▪ Email, Letter & CD |
| 2. General Consultation Bodies | General Consultees (<i>Local Groups / Organisations</i>) | ▪ Letter ▪ Email |
| 3. Other Consultees | Other Consultees (<i>General organisations</i>) | ▪ Letter ▪ Email |
| 4. List of Other Organisations and Groups not identified in Planning regulations | 90 Bradford Councillors & Members of Parliament (MPs) | ▪ Email |
| | Notification Request | ▪ Letter |
| | Email Notification Request | ▪ Email |
| | LDF Newsletter Subscribers | ▪ Email |

2.3.4 Local news press / media provided extensive coverage on the Core Strategy: Further Engagement Draft consultation. In particular, the Telegraph and Argus ran a lengthy campaign using the Strategic Housing Land Availability Assessment (SHLAA) to highlight the potential development sites and implications for the local communities within each of the 27 settlement areas within the District. A list of all the news articles published can be found in Appendix 3. The following newspapers specifically gave notice of the consultation period and consultation events to residents across the District:

- Telegraph and Argus on Monday 24th October 2011
- Keighley News on Thursday 17th November 2011
- Ilkley Gazette on Thursday 17th November 2011; consultation extension 12th January 2012

2.3.5 The **Council's LDF website** (www.bradford.gov.uk/LDF), in particular the Core Strategy webpage, was used to facilitate communication of the consultation and the time period. Consultation documents were made available to view and download throughout the consultation process and details of the technical and area 'drop-in' events were advertised. Details of how people could comment on the consultation

documents, along with a comment form, were clearly provided. The webpage image can be found in Appendix 4.

- 2.3.6 Results post consultation indicated that the Core Strategy: Further Engagement Draft consultation web page received 4,599 page views or 'hits' between 28th October 2011 and 20th January 2012. By the extension deadline of 29th February 2012, this figure had increased to 5,894 page views or 'hits'.

http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/core_strategy_preferred_options_stage

- 3.3.7 **Issue 14 of the LDF Newsletter - Plan-It Bradford** was sent out electronically via email to over 350 subscribers in November 2011 with details of the consultation and area drop-in events. This newsletter along with past editions is available to view on the Council's website. Extracts of this newsletter can be found in Appendix 5.

- 3.3.8 An article highlighting the consultation was published in the **winter 2011 edition of Community Pride**, the Council's newsletter, which is distributed to every household within the District.

- 2.3.9 The Council's corporate account on **social media sites** such as Twitter and Facebook were utilised to advertise and raise the profile of the consultation.

- 2.3.10 The Council commissioned Trading Pictures, a local media company, to produce a **20 minute DVD** to facilitate public engagement. The DVD was to be viewed at area drop-in events and via a link on the Council's website. The purpose of the DVD was to:

- To be used as an accessible tool to enable wider consultation of the Core Strategy.
- To inform people living and working in the Bradford District of the current Core Strategy consultation, its timetable and how they can take part.
- To inform of the approach taken to produce the Core Strategy document.
- To act as an introduction into the main issues within the Strategy.
- To communicate the impact of the LDF and Core Strategy Further Engagement Draft on local communities
- To direct the audience towards the consultation documents and other accompanying documents to which they comment upon.

2.3.11 **Technical workshops** were organised for targeted stakeholders and providers to discuss the Further Engagement Draft consultation document. Stakeholders were sent targeted letters of invitation to these events to ensure that topic based issues were discussed. The topic based events included an introductory PowerPoint presentation which explained the content and approach of the topic/theme in the document. This was followed by a question and answer session whereby delegates could seek further clarity or information if required. The table below outlines when and where these events took place and how many people attended:

| Date | Time | Topic Workshop | Venue | No. of Attendees |
|--|-------------|------------------------------|---|------------------|
| Thursday 17 th November 2011 | 10 – 12noon | Economy & Jobs | Banqueting Hall, City Hall, Bradford | 20 |
| Friday 18 th November 2011 | 10 – 12noon | Housing | Banqueting Hall, City Hall, Bradford | 28 |
| Friday 18 th November 2011 | 2 – 4pm | Transportation & Movement | Banqueting Hall, City Hall, Bradford | 11 |
| Monday 21 st November 2011 | 10 – 12noon | Environment | Banqueting Hall, City Hall, Bradford | 13 |
| Monday 21 st November 2011 | 2 – 4pm | Minerals | Banqueting Hall, City Hall, Bradford | 7 |
| Monday 28 th November 2011 | 10 – 12noon | Infrastructure | Council Chamber, City Hall, Bradford | 11 |
| Total Number of Attendees: | | | | 90 |

2.3.12 A separate technical event report has been produced which provides a record of each event and the discussions which took place.

2.3.13 Several **Area ‘drop-in’ events** were organised across the Bradford District to allow stakeholders, community groups and residents to come along and find out more about the draft plan and to gain a better understanding of the LDF and Core Strategy process.

2.3.14 At each of these area events the following were available to members of the public:

- Consultation documentation (as listed in paragraph 2.1.1)
- Summary leaflets and information leaflets
- Evidence base reports (as listed in paragraph 2.1.3)
- A series of exhibition panels summarising the consultation were on display
- A 20 minute DVD to introduced the Core Strategy consultation

- Officers were available to answer any questions
- Equality and Diversity Monitoring Forms

2.3.15 The table below outlines the area ‘drop-in’ events which took place and the number of people who recorded their attendance on the day:

| Date | Time | Area | Venue | No. of Attendees |
|--|----------|-----------------------------|--|------------------|
| 22 nd November 2011 | 12 – 7pm | Bradford East | Thornbury Centre, Bradford | 9 |
| 23 rd November 2011 | 12 – 7pm | Bradford North & Airedale | Shipley Town Hall, Shipley | 9 |
| 24 th November 2011 | 12 – 7pm | Bradford West & City Centre | National Media Museum, Bradford | 26 |
| 25 th November 2011 | 12 – 7pm | Bradford South | Richard Dunns Sports Centre, Bradford | 25 |
| 26 th November 2011 | 12 – 7pm | Bradford West & City Centre | National Media Museum, Bradford | 5 |
| 29 th November 2011 | 12 – 7pm | Wharfedale | Kings Hall, Ilkley | 290 |
| 2 nd December 2011 | 12 – 7pm | Keighley | Temple Row Centre, Keighley | 13 |
| 17 th January 2012 | 4 – 7 pm | Bingley | Ferncliffe House, Bingley | 69 |
| 18 th January 2012 | 4 – 7 pm | Pennine Towns | Children’s Centre, Victoria Hall, Queensbury | 31 |
| Total number of attendees that signed in: | | | | 477 |

Neighbourhood Forums

2.3.16 The Council’s Neighbourhood Support Services have been assisting the LDF Group in raising the profile of the Further Engagement Draft consultation within neighbourhood forums across the District. Area coordinators explained the consultation, handed out materials such as summary leaflets, information leaflets and directed members of the public to the relevant points of contact. The following neighbourhood Forums have had an item on the Core Strategy consultation:

| Area Coordinator Office | Neighbourhood Forum & Date |
|-------------------------|--|
| Bradford South | <ul style="list-style-type: none"> ▪ Holme Wood – 15th October 2011 ▪ Holme Wood – 17th October 2011 ▪ Holme Wood – 20th October 2011 <p><i>(Drop-in's linked to Neighbourhood Development Plan)</i></p> |
| Bradford West | <ul style="list-style-type: none"> ▪ Allerton – 16th February 2012 ▪ Thornton – 21st February 2012 |
| Shipley | <ul style="list-style-type: none"> ▪ Menston - 5th October 2011 ▪ Windhill & Westroyd - 6th October 2011* ▪ Burley - 20th October 2011 ▪ Wrose East - 15th November 2011* ▪ Shipley South - 1st December 2011* ▪ Saltaire Project Team – 15th February 2012 ▪ Eldwick & Gilstead - 29th February 2012 ▪ * <i>Consultation highlighted in report back to the community</i> |

2.3.17 The Planning and Transport Strategy Manager attended a series of **Town & Parish Council meetings** during the consultation period in order to raise the profile of the Core Strategy, the wider LDF and to allow community members to gain a fuller understanding and implications of the consultation document on local communities. These meetings were held as follows:

| Date | Time | Town / Parish Council | Venue |
|--------------------------------|----------|--|-------------------------------|
| 14 th December 2011 | 6 – 8pm | Parish Council Liaison Meeting | Keighley Town Hall |
| 11 th January 2012 | 1 – 2 pm | <ul style="list-style-type: none"> • Ilkley Parish Council • Burley Parish Council • Menston Parish Council • Baildon Parish Council | Queens Hall, Burley |
| 16 th January 2012 | 7 – 9 pm | <ul style="list-style-type: none"> • Silsden Parish Council • Steeton-with-Eastburn Parish Council • Addingham Parish Council | Silsden Town Hall, Silsden |
| 17 th January 2012 | 7 – 9 pm | <ul style="list-style-type: none"> • Cullingworth Parish Council • Denholme Parish Council • Harden Parish Council • Haworth Parish Council • Oxenhope Parish Council • Wilsden Parish Council | Village Hall, Wilsden |

| | | | |
|-------------------------------|----------|---|---------------------|
| 30 th January 2012 | 6 – 8 pm | <ul style="list-style-type: none"> • Keighley Town Council | Keighley Town Hall |
| 1 st February 2012 | 6 – 8 pm | <ul style="list-style-type: none"> • Wrose Parish Council • Clayton Parish Council • Trident Community Council | City Hall. Bradford |

2.4 Planning Aid England Consultations

2.4.1 Planning Aid England held a number of targeted consultation events during the Further Engagement Draft consultation, these included:

| Date | Time | Group / Organisation | Venue | No. of Attendees |
|---|--------------|---|------------------------------------|------------------|
| 7 th October 2011 | | Capacity Building with Bradford Tenants and Residents Association | Keighley | |
| 2 nd December 2011 | 12 – 7pm | Presence at the Keighley Area Drop In event | Temple Row Centre, Keighley | N/A |
| 4 th January 2012 | 7.30 – 9pm | Holme Wood Churches | Holme Church, Holme Wood, Bradford | 12 |
| 10 th January 2012 | | Keighley Town Council | Keighley Town Hall | 18 |
| 16 th January 2012 | 11 – 12.30pm | Bradford Older People's Forum (BOPA) | Alhambra Studios, Bradford | 73 |
| 24 th January 2012 | 4 – 8pm | Keighley & Ilkley Voluntary & Community Action (KIVCA) & All Keighley Communities Together (AKCT) | Central Hall, Keighley | 25 |
| 6 th February 2012 | 10 – 1pm | Consortia of Ethnic Minority Organisations (COEMO) | Carlisle Business Centre, Bradford | 16 |
| Approximate number of attendees: | | | | 144 |

2.5. Equality and Diversity Monitoring

2.5.1 As part of the Councils commitment to ensuring that consultations target and reach a wide variety of people within the local community in terms of age, sex, religion, ethnic origin and sexual orientation, an 'Equality and Diversity Monitoring Form' was produced for people to fill in and return. These forms were given out at the technical events, area events and were requested to be submitted along with written representations.

2.5.2 A total 157 Equality and Diversity Forms were completed and returned during this consultation. The full statistical results from this exercise can be found in Appendix 9.

| QUESTION | OPTIONS | |
|------------------------------------|--|-----------|
| Live in District? | Yes | 132 |
| | No | 3 |
| | Interest | 14 |
| Gender | Male | 98 |
| | Female | 51 |
| | Transgender | 0 |
| Age | 16 or under | 1 |
| | 16 - 25 | 3 |
| | 26 - 35 | 16 |
| | 36 - 45 | 16 |
| | 46 - 55 | 37 |
| | 56 - 65 | 41 |
| | 65 + | 35 |
| | Disability | No |
| Physical | | 7 |
| Learning | | 0 |
| Mental Health | | 1 |
| Sight Loss | | 1 |
| Blind | | 0 |
| Hearing Loss | | 4 |
| Deaf | | 1 |
| Other long term | | 3 |
| Ethnic Origin | White English / Irish / NI | 134 |
| | White Irish | 0 |
| | White Other | 2 |
| | Mixed White / Black Caribbean | 0 |
| | Mixed White / Black African | 0 |
| | Mixed White / Black Asian | 0 |
| | Mixed Other | 1 |
| | Asian / Asian British Indian | 2 |
| | Asian / Asian British Pakistani | 2 |
| | Asian / Asian British Kashmiri | 0 |
| Asian / Asian British Other | 1 | |

| | | |
|--|--|------------|
| | Black / Black British Caribbean | 1 |
| | Black / Black British African | 1 |
| | Black / Black British Other | 1 |
| | Chinese | 0 |
| | Arab | 0 |
| | Other | 0 |
| | Don't Know | 0 |
| | Gypsy or Traveller | 0 |
| Religion | No Religion | 41 |
| | Christian | 95 |
| | Buddhist | 0 |
| | Hindu | 2 |
| | Jewish | 0 |
| | Muslim | 2 |
| | Sikh | 0 |
| | Other | 4 |
| Sexuality | Heterosexual / Straight | 134 |
| | Bisexual | 1 |
| | Gay | 0 |
| | Lesbian | 1 |
| | Other | 4 |
| Decline | No Participation | 7 |
| TOTAL NO. OF EQUALITY FORMS COMPLETED | | 157 |

3.0 SUMMARY OF CONSULTATION RESPONSES

- 3.1 There was a very substantial, useful and constructive response to the consultation material. The following sections provide an overview of the responses received along with a summary of the main issues raised.
- 3.2 The Strategic Housing Land Availability Assessment (SHLAA) was published as evidence alongside the Core Strategy Further Engagement Draft document. As a result a large proportion of comments received focused on issues relating to specific sites within the SHLAA report. Many of these comments included strategic issues and therefore have been treated as Core Strategy representations. Where comments have related to specific sites or areas, these comments will be considered as part of the Allocations Development plan Document (DPD).
- 3.3 The Council received a total of 1,255 written representations during the consultation.
- 1,222 of these were duly made and submitted within the set deadline;
 - 33 of these were not duly made as:
 - 19 were received after the formal set deadline; and
 - 14 were submitted with no known name and/or postal address;
 - 1 representation has since been withdrawn
- 3.4 The methods of submissions were primarily by email or by post. Many submissions were duplicated. The first method of submission has been recorded.
- 624 submissions by E-mail
 - 622 submissions by post / hand delivered (* *Excl anonymous letters*)
 - 9 Faxes
- 3.5 These responses included a range of Statutory Bodies, Local Authorities, Town and Parish Councils, amenity and interest groups, developers, infrastructure providers, various under-represented groups and members of the general public.

The table below indicates an approximate breakdown of all consultation responses received:

| Category of Respondent | Responses Received |
|--------------------------------|--------------------|
| Statutory Bodies | 10 |
| Town & Parish Councils | 12 |
| Bradford MDC Councillors / MPs | 7 |
| Community Groups | 24 |
| Organisations | 37 |
| Agents | 72 |
| Individuals | 1092 |

3.6 In addition to the responses, the Council received four petitions. These comments have been duly noted. Details of the petitions received are outlined in the table below:

| Rep No. | Petitioner | Date | Subject | Total No. of Signatories |
|---------|--|---|--|--------------------------|
| 757 | Gordon Dey | 20 th January 2012 & 7 th February 2012 | 'Tong, Fulneck Valley and Westgate Hill' | 1008 |
| 893 | Eldwick & Gilstead Horticultural Society | 24 th February 2012 | Objecting to various 'GREEN ISSUES' in LDF, SHLAA, CORE STRATEGY DPD | 56 |
| 1072 | Anthea Orchard | 29 th February 2012 | Thornton Moor Wind Farm Action Group | 225 |
| 1090 | June Barker | 29 th February 2012 | 'Don't Build on our Green Spaces' (<i>Idle & Thackley</i>) | 60 |

4.0 Transition from the Further Engagement Draft to the Publication Draft

- 4.1 The Further Engagement Draft consultation sought the views of consultees regarding the proposed draft Core Strategy and the policies contained within it. The comments received to this consultation are summarised in Appendix 6.

How the issues raised have been taken into consideration and addressed in the Core Strategy: Publication Draft

- 4.2 The table in Appendix 6 includes provides a summary of the key issues and sub issues which have been raised by respondents during this consultation. Alongside each issue a response has been provided to explain how the Council has dealt with or addressed the issue as it prepares the Publication Draft document and relevant evidence base reports.
- 4.3 Bradford Council has not responded to each individual representation or comment received, instead the key issues and sub issues which emerged have been grouped together and an appropriate Council response provided.
- 4.3 Separate consultation logs are available alongside this document which provides a detailed record of all the consultation events undertaken. A list of these reports can be found in Appendix 8.

Further Plan Discussions: CABE – Design Council – August 2012

- 4.4 On 22nd August 2012, the Council attended a local plan workshop in Leeds held by CABE Design Council. A Local Plan Panel Review panel put together by CABE assessed the Core Strategy Further Engagement Draft and provided useful comments and suggestions for the Council as it progresses towards the Publication Draft. These suggestions have been noted and used to inform the next stage of the local plan.

APPENDIX 1:

LIST OF ORGANISATIONS AND BODIES CONSULTED UNDER REGULATION 25 – FURTHER ENGAGEMENT DRAFT (2011-2012)

SCI 1 - Statutory Consultation Bodies

- Airedale NHS Foundation Trust
- Bradford & Airedale Teaching Primary
- Care Trust
- Bradford Hospitals NHS Trust
- British Telecom
- English Heritage
- Entec UK Ltd
- Environment Agency
- Highways Agency, Yorkshire & Humber
- Homes and Communities Agency
- National Grid
- Natural England
- Network Rail
- North Bradford Primary Care Trust
- Telewest Communications
- The Coal Authority
- West Yorkshire Police Crime Prevention
- West Yorkshire Police
- Yorkshire Electricity
- Yorkshire Forward Regional Development Agency
- Yorkshire Water Services Ltd

SCI 1 - Statutory Consultation Bodies - Adjoining Local Planning Authorities

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

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

- Addingham Parish Council
- Baildon Parish Council
- Bradford Trident Community Council
- Burley Parish Council
- Clayton Parish Council
- Cullingworth Parish Council
- Denholme Town Council
- Harden Parish Council
- Haworth, Cross Roads & Stanbury Parish Council
- Ilkley Parish Council
- Keighley Town Council
- Menston Parish Council
- Oxenhope Parish Council
- Sandy Lane Parish Council
- Silsden Town Council
- Steeton with Eastburn Parish Council
- Wilsden Parish Council
- Wrose Parish Council

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

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

SCI 2 - General Consultation Bodies

- 3rd Queensbury Guides
- Able All
- Activity and Recreation Centre
- Adare Group
- Aire and Calder Rivers Group
- Aire Valley Conservation Society
- Airedale Enterprise Agency
- Airedale Partnership
- Aldersgate Parent / Toddler Group
- All Saints Landmark Centre
- Allerton Community Association
- Anand Milan Centre
- Anchor Housing Association
- Apperley Bridge Development Residents Association
- Arnold Laver
- Asda Stores Limited (ASDA)
- Asian Business Forum
- Asian Trades Link
- Attock Community Association
- Baildon & District Residents Association
- Baildon Community Council
- Baildon Community Link
- Baildon Moravian Church
- Bangladeshi Community Association - Bradford
- Bangladeshi Community Association - Keighley
- Bankfoot Partnership
- Barnardo's Allergrange Community Service
- Bedale Centre
- Ben Rhydding Action Group / Save Us Pub
- Bierley Community Centre
- Bierley Community Association & Bethel Community Church
- Bingley CVS
- Bingley Environmental Transport Association
- Bingley Labour Party
- Black Mountain Millennium Green / Brunel Community Association
- Black Women's Support Project
- Bolton Villas HUB Project
- Bolton Woods Community Association
- Bolton Woods Community Centre
- Bracken Bank & District Community Association (Sue Belcher Centre)

- Bradford & District Coalition of Disabled People
- Bradford & Ilkley College
- Bradford & Northern Housing Association
- Bradford Access Action
- Bradford Alliance on Community Care Limited
- Bradford and District Association of Deaf People
- Bradford Association of Visually Impaired People & Centre for Deaf People
- Bradford Botany Group
- Bradford Breakthrough Ltd
- Bradford Business Link
- Bradford Cathedral
- Bradford City Farm Association Ltd
- Bradford Civic Society
- Bradford Community Environment Project
- Bradford Community Health Trust
- Bradford Community Housing Trust
- Bradford CVS
- Bradford District Senior Power
- Bradford East Area Federation
- Bradford Joint Training Board
- Bradford Khalifa Muslim Society (Heaton Community Centre)
- Bradford Lesbian and Gay Youth
- Bradford Moor Community Centre
- Bradford Night Stop
- Bradford Older People's Alliance
- Bradford Ornithological Group
- Bradford Ramblers Association Group
- Bradford Retail Action Group
- Bradford South & West Live at Home Scheme
- Bradford Urban Wildlife Group
- Bradford Youth Africa
- Braithwaite & Guard House Community Association
- Braithwaite & Guard House Community Association
- Braithwaite People's Association
- Brunel Support Works
- Burley Community Council
- Buttershaw Business and Enterprise College
- Buttershaw Christian Family Centre
- Cafe West
- Canterbury Youth and Community Centre
- Carlisle Business Centre
- Carter Jonas
- Cathedral Centre Project
- CHAS Housing Aid
- Checkpoint / Bradford West Indian Community Centre Association
- Claremont Community Trust
- Clarke Foley Centre
- Clays of Addingham
- Clayton Village Hall Community Centre
- CNet
- Colin Appleyard
- Community Association of Great Horton
- Community Service Volunteers
- Community Team Learning Disabilities
- Communityworks
- Cottingley Community Association
- Cottingley Cornerstone
- Crossflats Village Society
- Cullingworth Village Hall
- DDA Task Team
- Delius Arts and Cultural Centre
- Denholme Community Association
- Denholme Residents Action Group (DRAG)
- Dial Bradford
- Disability Support (DS)

- Dracup Lodge Day Nursery
- Drovers Way Residents Group
- Eccleshill Youth And Community Association Ltd
- Edward's Rainbow Family Community Centre
- Eldwick Village Society
- Eldwick Memorial Hall Trust
- CBMDC - Environment Partnership
- Equity Partnership - Bradford LGB Strategic Partnership
- Fagley Lane Action Committee
- Fagley Tenants & Residents Association
- Fagley Youth and Community Centre
- Faxfleet Residents Association
- Forster Community College
- Friends of Buck Wood
- Friends of The Gateway
- Frizinghall Community Centre
- Girlington Action Partnership
- Girlington Community Association
- Goitside Regeneration Partnership
- Grange Interlink Community Centre
- Greenhill Action Group
- Greenway Amenity Group
- Greenwood Youth and Community Association
- GVA Grimley
- H.B.P Residents Association
- Hainworth Wood Community Centre
- Harden Village Society
- Haworth & Oxenhope District Bridleways Group
- Haworth Community Centre
- Hazel Beck Action Group
- Heaton St Barnabas Village Hall
- Heaton Woods Trust
- Highfield Community Centre
- Highfield Healthy Lifestyle
- Holme Christian Community
- Holme Church / Holme Christian Community
- Holmewood Community Council
- Holme Wood Activity Centre
- Hopes Centre
- Idle Baptist Church and Community Centre
- Idle Village Tenants & Residents
- Ilkley CVS
- Ilkley Design Statement Group
- Incommunities
- Iyss Localities West
- Jenny Lane Action Group
- KADAL
- Karmand Community Centre
- Keighley Association Women's and Children's Centre
- Keighley College
- Keighley Disabled People's Centre
- Kirkland Community Centre
- Labrys Trust
- Laisterdyke Trinity Community Centre
- Let Wyke Breathe
- Lidget Green Community Partnership
- Light of The World Community Centre
- Long Lee Village Hall
- Low Moor Local History Group
- Making Space
- Manningham & Girlington SRB
- Manningham Community Development Centre
- Manningham Mills Community Association
- Margaret McMillan Adventure Playground Association
- Marshfield Community Association

- Masts
- Menston Cares
- Menston Community Association
- Micklethwaite Village Society
- Millan Centre
- Mobility Planning Group
- Mossdale Residents Community Group
- National Media Museum
- New Testament Church of God
- Newton Street Day Centre
- North Community Centre
- North East Windhill Community Association
- Oakdale Residents Association
- Oakenshaw Residents' Association
- Older People's Focus Group
- Oxenhope Social Club
- PACT
- Pakistan Community Neighbourhood Association
- Pan African Arts and Cultural Group
- Parkside Community Centre
- Plevna Area Resident's Association
- Polish Community Centre - Friday Group
- Prime Property Investments Limited
- Princeville Community Association
- Q2 - Community Centre
- Queensbury Community Centre
- Queensbury Community Programme
- Ravenscliffe & Greengates Community Forum
- Ravenscliffe Community Association
- Ravenscliffe Youth Centre
- Rockwell Centre
- Royds Community Association
- Ryecroft Community Centre
- St Johns Church of England
- St Aidan's Presbytery
- St John's Luncheon Club
- St Christopher's Youth Project
- St Francis Village Hall / St Peters PCC
- St Mary's New Horizons Care in the Community
- St Oswald's West End Centre
- Saltaire Village Society
- Salvation Army - Holmewood
- Sangat Community Association
- Save Us Pub
- Scholemoor Beacon
- Scholemoor Community Association
- Sedbergh Youth & Community Centre
- Sensory Needs Services
- Shipley and Bingley Voluntary Services - Bingley branch
- Shipley College Library
- Shipley Constituency Area Panel Advisory Group (SCAPAG)
- Shipley CVS
- Shop Mobility
- Shree Krishna Community Centre
- Silsden Town Action Group
- South Bradford Community Network
- Southmere Primary School
- South Square Centre
- Springfield Youth And Community Centre
- Stockbridge Neighbourhood Development Group
- Support Works
- Sutton Community Association
- Tesco Stores Ltd
- The City Centre Project
- The Diamond Community Cafe
- The Girlington Centre
- The Khidmat Centre
- The Kirkgate Centre
- The St Hugh's Centre

- The Vine Trust
- Thornbury Centre
- Thornbury Youth Association
- Thorpe Edge Community Forum & RCDP
- Thorpe Edge Community Project
- TJ Hughes
- Touchstone Project
- Transport 2000
- Trident
- Turley Associates
- University of Bradford
- Victor Road Community Project
- Visual Disability Services
- Walker Morris
- West Central Area District Federation
- Tenants & Residents
- Wharfedale Friends of the Earth
- Wilsden Village Hall
- Windhill Futures Project
- Woodhouse & Springbank NF
- Woodlands Cricket Club - Oakenshaw
- Woodside Action Group
- Wrose Community Centre
- Wyke Armature Rugby League Club
- Wyke Christian Fellowship
- Wyke Community And Children's Centre Ltd
- Wyke Manor Community Centre
- YMCA - City of Bradford

SCI 2 - General Consultation Bodies – Planning Agents

- A A Planning Services
- A Furness
- Aireborough Planning Services
- Aldersgate Estates Ltd
- Al-Farouq Associates
- Allison And MacRae
- Asquith Properties
- Atkinson Robinson Architects
- B K Designs
- Banks Long & Co
- Beckwith Design Associates
- Bioregional Quintain Developments
- BJ Design Services
- Blue Room Properties
- Brewster Bye Architects
- Caddick Development
- Calder Architectural Services Limited
- City Lofts Development
- Clear Designs
- Contract Services
- Craven Design Partnership
- Dacre Son And Hartley
- Dacre Son And Hartley Planning Unit
- Dales Design And Developments
- David Beighton Architects
- David Wilson Estates
- DLA Architecture
- Donaldsons
- Dr H Salman
- DTZ Piedad Consulting
- E&M Batley Chartered Architects & Surveyor
- Eddisons Commercial
- Eric Barraclough
- Eric Breare Design Associates
- F And W Drawing Services
- Farrell and Clark
- Four Square Drawing Services
- G Sutton
- G R Morris Town Planning Consultant

- GP Planning And Building Services
- George E Wright
- Gregory Properties
- GVA Grimley
- Halliday Clark
- Ham Group
- Hartley Planning Consultants
- Hayes Dobson Developers Limited
- HJ Banks and Co Ltd
- J C Redmile
- J G Nolan
- J H Langtry-Langton And Partners
- J R Wharton Architect
- J Slater
- J S Wright
- Kelly Architectural Design
- Khawaja Planning Services
- Landtask
- Langtree
- Malcolm Bayliss
- Manor Property Group
- Mark Brearley & Co Chartered Surveyors
- Martin Smith Designs
- McGinnis Development
- Michael Beaumont
- Michael Hudson
- MNB Partnership
- New Mason Properties
- Nuttall Yarwood And Partners
- Oltergraft Planning Services
- P M Coote
- P J Draughting Services Ltd
- Parkgate Design
- Paul Willoughby Associates
- Patchett Homes Ltd
- Philip S Ryley & Co
- Piccadilly Estate Management Ltd
- Planet Design Group
- Planning And Design
- Priority Sites Ltd
- Robinson Architects
- Rosedale Draughting Services
- Simon Estates Ltd
- Spawforth Planning Associates
- St James Securities Ltd
- Star Keys Estate Agents, Valuers & Surveyors
- Stephen F Walker
- SWG Planning Services
- Turner Associates
- Urban Splash
- VJ Associates
- Webb Seeger Moorhouse Partnership Limited
- Westfield Shoppingtown Ltd
- William Walker Partnership
- Woodhall Planning & Conservation
- Working Architects Co-Op Limited

SCI 3 – General Consultation Bodies (Other Consultees)

- Addingham Civic Society
- Age Concern
- Age Concern Bradford and District
- Alzheimers Society
- Ancient Monuments Society
- Baildon Civic Society
- Bingley Civic Trust
- Bradford Chamber of Commerce & Industry
- Bradford Chamber of Commerce & Industry
- Bradford Civic Society
- Bradford District Chamber of Trade

- Bolsterstone Plc
- British Waterways
- British Wind Energy Association
- Buildings Consultation Group
- CABE
- Commission for Architecture and the Built Environment
- Council for British Archaeology
- Council For Mosques
- CPRE Bradford District
- CPRE West Yorkshire
- DEFRA
- Diocesan Board of Finance
- First
- First Bradford
- Friends, Families and Travellers and Traveller Law Reform Project
- Future Energy Yorkshire
- GMI Waterside Shipley Ltd
- Hackney Carriage Proprietors Association
- Home Builders Federation
- Housing Corporation
- Ilkley Civic Society
- Islamic Relief
- Joseph Rowntree Charitable Trust
- Just West Yorkshire
- Keighley Community Transport
- Keighley Local Enterprise Agency
- Keighley Voluntary Services
- Learning and Skills Council
- Leeds Friends of the Earth
- Leeds/Bradford International Airport
- Mercury Communications
- Metro
- Mobile Operators Association
- National Farmers Union
- National Federation of Gypsy Liason Groups
- National Offender Management Service
- Planning Inspectorate
- Prince's Foundation
- Railtrack Property
- Ramblers Association
- Royal Mail Property Holdings
- Royal Mail Group Property
- Royal Town Planning Institute
- RSPB
- Safer City – Bradford & District
- South Pennines association
- South Pennines Packhorse Trail Trust
- Sport England
- The British Horse Society
- The Theatres Trust
- West Yorkshire Archaeology Advisory Service
- West Yorkshire Ecology
- West Yorkshire Ecology
- West Yorkshire Fire & Rescue Service
- West Yorkshire Passenger Transport Executive & Authority
- Yorkshire Riding Centre
- Yorkshire Rural Community Council
- Yorkshire Union of Golf Clubs
- Yorkshire Wildlife Trust

SCI 3 – General Consultation Bodies (Minerals & Waste)

- A & S
- Aggregate Industries UK
- ASHLAR stone products
- M & M Stone
- Bedminister International
- Birks Royd Stone Ltd

- Bradley Natural Stone Products
- CEMEX UK Operations
- Clayax Yorkstone Ltd
- Colas Ltd
- Combined Masonry Supplies
- Darrington Quarries Ltd
- Dolmens
- Ennstone Johnstone
- Farrar Natural Stone
- Hainworth Shaw Quarries
- Hanson Aggregates
- Hard York Quarries Ltd
- Lafarge Aggregates & Concrete UK
- M & G Stone Ltd
- Midgeham Cliff End Quarry Ltd
- Mineral Resources (Yorkshire) Ltd
- Myers Group
- Naylor Hill Quarry
- New Close Farm
- Northern Stone & Paving Co
- P Casey (Enviro) Limited
- Parkinson Spencer Refractories Ltd
- Phillip Summers Groundworks Ltd
- Quarry Products Association
- Russell Stone Merchants
- S M Building Products
- Shipley Stone Sales
- Sibelco UK
- Skipton Properties LTD
- Stone Federation Great Britain
- Tarmac Northern Limited
- The Bingley Stone Company (Yorkshire) Ltd.
- The British Aggregates Association
- The Green Mineral Company
- Vista Environmental Limited
- W E Leach (Shipley) Ltd
- Woodcrown Ltd
- Yorkshire Aggregates Ltd
- Charles Raistrick

SCI 4 - Other Consultees (List of other Organisations and Groups Consulted that are not identified in the Planning Regulations) – Organisations & Agents

- 90 Bradford Councillors
- 5 Members of Parliament for the Bradford, Keighley and Shipley Constituencies
- Accent Homes
- Accent Homes
- Alan Eden Michael Hellowell & Assoc
- Allan Booth
- Allison and MacRae
- Alyn Nicholls and Associates
- Andrew Coates
- Andrew Durham
- Andrew Martin Associates
- Anthony Barnet
- Archial Architects
- Archi-Structure - A Al-Samarraie
- Architecture 2B
- Arrowsmith Associates
- Arts Team
- Aspinall Verdi
- Atkins
- B D Gill
- B R Kaupe
- B3 Architects
- Barker & Jordan Architects
- Barrat Homes (Northern)

- Barratt Homes
- Barton Willmore
- Barton Willmore
- Beckwith Design
- Bellway Homes
- Belmont Design Services
- BIC
- Bowman Riley Partnership
- Bradford Friends of the Earth
- Breare Design
- Brewster Bye Architects
- Britannia Developments
- Brooke Properties
- Brookhouse Group
- Brother Investments
(Yorkshire) Ltd
- Burnett Planning &
Development
- Butterfield Signs Limited
- Cad designs
- Cala Homes Yorkshire
- Campaign For Real Ale
- Caraspac Consulting
- Carter Jonas
- Carter Jonas
- Carter Jonas
- CB Richard Ellis Ltd
- CBRE
- Chris Eyres Design
- Chris Thomas Ltd
- CJS Designs
- CLR Architects
- Commercial Estates Group
- Commercial Estates Group
- Consort Homes
- Coral Windows (Bradford) Ltd
- Costco Wholesale Auk Ltd
(Costco)
- Countryside Properties
(Northern) Ltd
- Countryside Properties
(Northern) Ltd
- Craven Design Partnership
- Cunningham Planning
- Dacres
- Dalebus
- David Beighton Architects
- David Bruce
- David Hill
- David Hill 2
- David R Bamford & Associates
- David Richards
- David Wilson Homes
Northern
- Depol Associates
- Development Planning Partnership
- DevPlan UK
- Dialogue Communicating
Planning
- Directions Planning
- Directions Planning Consultancy
- DJ Richards
- DLP Consultants
- Dodd Franklin Stocks Partnership Ltd
- Douglas S Brook
- DPDS Consulting Group
- DPP
- DPP
- DPP
- DPP LLP
- DPP LPP
- Drivers Jonas
- Dunlop Haywards Planning
- Eddisons
- Esholt Sports & Leisure Ltd
- Esholt Sports & Leisure Ltd

- Eye 4 Design
- F M Lister & Son
- F S K Architectural Services
- Faum Design
- Firebird Homes
- Firstplan
- Forward Planning & Design
- Fox Land & Property
- Fox Land & Property
- Future Energy Yorkshire
- G L Hearn Property Consultants
- G W P Architects
- GA Sorsby - Graphic Architecture
- George Wimpey
- George Wimpey Northern Yorkshire Ltd
- George Wimpey West Yorkshire Ltd
- GL Hearn
- GL Hearn
- GLR Architects
- Golden Cross House
- Goldfinch Estates Ltd
- Gough Planning Services
- Graham Farmer
- GVA Grimley
- GVA Grimley
- GWP Architecture
- Hallam Land Management
- Hallam Land Management Limited
- Halliday Clark Ltd
- Halton Homes
- Hartley Planning Consultants
- Haworth, Cross Roads & Stanbury Parish Council
- Haworth, Cross Roads & Stanbury Parish Council
- Healy Associates
- Heritage Conservatories
- Honley Properties
- Horsley Townsend
- How Planning
- Hurstwood Group
- I D Planning
- I D Planning
- IHC Planning
- Indigo Planning
- Indigo Planning
- Indigo Planning
- Indigo Planning Ltd
- Inland Waterways Association
- Insight Design
- Integral Design Solutions
- J B Birch
- J O Steel Consulting
- Jacobs
- James Ellis Planning
- Januarys
- Janus Architecture
- Jas Architecture Services
- JBD Architects
- Jeff McQuillan Consulting
- Jeff Redmile
- Jefferson Sheard Architects
- John Crosse
- John Thornton Chartered Architect
- Jones Homes
- Jones Lang LaSalle
- JWPC Limited
- Ken Pearson
- KeyLand Developments Limited

- Khawaja Planning Services
- Kirkwells - Town Planning & Sustainable Development Consultants
- Knight Frank
- Lambert Smith Hampton
- Land & Development Practice
- Land & Development Practice
- Land and Development Practice
- Land and Development Practice
- Langtree Artisan
- Langtry Langton
- Leith Planning
- Leith Planning Ltd
- Level
- Little Germany Developments Ltd
- Littman Robeson
- Lowerfields Primary School
- M W Rickaby
- Magellan Properties
- Magellan Properties Ltd
- Malcolm Bayliss
- Mark Scatchard
- Mark Wogden Architect
- Martin Walsh Associates
- Martin Walsh associates
- Martineau
- Menston Parish Council
- METRO
- Mi7 Developments Ltd
- Michael Hall Associates
- Miller Homes Limited – Yorkshire
- Miller Strategic Land
- Minerals Planning Group
- Morston Assets Limited
- MSS Architectural Design Services
- New Horizons
- Newmason Properties
- NHS
- NJL Consulting
- Nook Cottage
- Northern Trust
- North Country Homes Group Ltd
- Npower Renewables
- Nuttal Yarwood and Partners
- Orion Homes
- P M Coote
- P N Bakes Architectural Consultancy
- Patchett Homes
- Paul Kirkman
- Paul Rawlings
- Paul Willoughby Associates
- PDS
- Peacock and Smith
- Peacock and Smith
- Permission Homes
- Persimmon Homes
- Peter Brooksbank
- Planning & Development
- Planning Matters
- Planning Potential
- Planning Prospects Ltd
- Plot of Gold Ltd
- Prime Sight Advertising
- Provizion First Architecture
- Purearth PLC
- R Dawson
- Rance Booth & Smith
- Rance Booth & Smith
- Rance Booth & Smith
- Rance Booth & Smith

- Randfield Associates
- Redrow Homes
- Redrow Homes (Yorkshire) Ltd
- Regan Associates
- Resident
- Resident - Burley-in-Wharfedale
- Resident - Thackley
- Richard Blenkiron
- Robert Hodgkiss
- Robinson Architects
- Robinson Architects
- Robinson Group
- Robinson Group
- Rollinson Planning Consultancy
- Rollinson Planning Consultancy
- Rone Design
- Rone Design
- Royds Advice Service
- RPS
- RPS Planning
- RRP Group
- Rural Solutions Consulting
- S R Design
- Saltaire Village Society
- Salts Tennis Club
- Sanderson & Weatherall
- Sanderson Weatherall
- Savills
- Scott Wilson
- Scott Wilson
- Scott Wilson Ltd
- Sense of Space
- Simon Paxford
- Skipton Properties
- SMC Gower Architects
- Society for the Protection of Ancient Buildings
- Spawforths
- Spawforths
- Strategic Services
- Strutt & Parker
- Sunningdale & Manor Park NHW
- Taylor Wimpey UK Limited
- Taylor Wimpey UK Limited
- Taylor Woodrow Developments Plc.
- Taylor Young
- The Abbeyfield Society
- The Arley Consulting Company Ltd
- The Co-operative Group Ltd
- The Co-operative Group Ltd
- The Design Works
- The Drawing Board (UK) Ltd
- The Emerson Group
- The Garden History Society
- The Georgian Group
- The Lawn Tennis Association
- The Moravian Manse
- The Salvation Army
- The St John's Centre
- The Twentieth Century Society
- The Victorian Society
- Think Design
- Think Design
- Tim Bennett
- Tony Plowman
- Transport Planning LTD
- Tribal MJP
- Turley Associates

- Turley Associates
- Turley Associates
- Turley Associates
- Turley Associates
- Turley Associates
- Turley Associates
- Turley Associates
- Turley Associates
- Vincent and Goring Ltd
- Wain Homes
- Wales Wales and Rawson
- Walker Morris
- Waller and Partners
- Walton & Co
- Watson Batty
- West Register Realisations Ltd
- Westlake & Co
- White Young Green
- White Young Green Planning
- WHP Wilkinson Helsby
- Woodhall Planning and Conservation
- Woodlands Trust
- WYG
- Yorkshire Gardens Trust
- Yorkshire Plans for You
- Zero Architecture Ltd

SCI 4 - Other Consultees (List of other Organisations and Groups Consulted that are not identified in the Planning Regulations) – Individuals

- A . B . Braithwaite
- Alan Black
- Alastair Sim
- Ali-Marie Ladwa
- Andrew Thorby
- Anthony Silson
- Audrey Brand
- Audrey Hall
- Audrey Livett
- Barney Lerner
- Berna White
- Bernard Stone
- Brian Rhodes
- Bruce Barnes
- C Cousins
- C V Barton
- Carl Rodrigues
- Caroline Craig
- Ceri Lloyd
- Charlie Webber
- Christine Kay
- Dale Cordingley
- Dave Rayner
- David Blackburn
- David Herdson
- David Machin
- David Metcalf
- David Smith
- Delphine Dorgu
- Elieen White
- Frances Horne
- Frank Kirk
- Gareth Tattersall
- Geoff Best
- Gilly Hoyle
- Gordon Dey
- Graham Willson
- Harvey Bosomworth

- Heidi Sobers
- Ian & Lisa Dowson
- Irene Hudson
- James Belk
- James Reddington
- Jason Taylor
- Jean Hill
- Jeanette Alderman
- Jen White
- Joanne Besford & Tony Zacharczuk
- Joe Kemp
- Joe Varga
- John & Judith Bolland
- John Crosse
- John Finnigan
- John Gledhill
- John Grundy
- John Horton
- John Miller
- John Muddiman
- John Wilkinson
- Josephine Vento
- Joyce Newton
- Karen Moore
- Karl Payne
- Kate Sewell
- Kurt Kunz
- Lara Crawford
- Laura Haworth
- Laura Haworth
- Lesley Bosomworth
- M Turner
- Martin Spiers
- Matthew Brooke
- Maura Fisher Peake
- Michael Branford
- Mick Thompson
- Mr & Mrs Filligan
- Mr C Narrainen
- Mr N Boocok
- Mr P. H. Flesher
- Mr T Bendrien
- Mrs B Smith
- Nancy Plowers
- Neil Wrathmell
- Norman Scarth
- Penny Richards
- Penny Trepka
- Peter Carruthers
- Pierre Richterich
- Revd John Nowell
- Richard Barran
- Richard Kunz
- Shauna & Robert Banks
- Shelia Robinson
- Simon Balding
- Simon East
- Simon Lewis
- Simon Morgan
- Ste Drye
- Stephen Corbett
- Steven Turner
- Suzanne F. Atkinson
- Tony Kilcoyne
- Trish Lambert
- W E Evans
- Yvette Guy
- Tom Jones

SCI 4 - Other Consultees (List of other Organisations and Groups Consulted that are not identified in the Planning Regulations) – LDF Newsletter Mailing List

Please note that some individuals or organisations listed here may duplicate from the lists above.

- 3rd Queensbury Guides
- Able All - Physical Disabled Forum
- Action for Business
- Addingham Village Society
- Adele Gunn
- Age Concern
- Age Concern Bradford
- Age Concern Bradford and District
- Agent
- Airedale NHS Trust
- Airedale Partnership
- Alan Black
- Alice Green
- Ali-Marie Ludwa
- Alistair Sim
- Anchor Trust
- Andrew Wilson
- Anthony Silson
- Anti-Crime Party
- Arrowsmith Associates
- Aspinall Verdi
- Audrey Livett
- Barnardo's Allergrange Community Service
- Barney Lerner
- Barratt Homes
- Barton Willmore
- BCHT
- BCHT
- BCHT
- BCHT (North)
- Bellway Homes
- Ben Rhydding Action Group & Save Us Pub
- BIC
- Bierley Community Association & Bethel Community Church
- Biffa Waste Services
- Bingley Branch Labour Party
- Bolton Woods Community centre
- BOPA
- Bowling Hall Medical Practice
- Bradford and District Older People's Alliance
- Bradford Cathedral
- Bradford Cathedral
- Bradford Centre Regeneration
- Bradford Chamber
- Bradford City Centre Residents Association
- Bradford CVS
- Bradford CVS
- Bradford CVS
- Bradford District Chamber of Trade
- Bradford friends of the Earth
- Bradford Group of the Ramblers Association,
- Bradford South & West Live at Home Scheme
- Bradford Trident
- Bradford Trident
- Bradford Womens Aid
- Bradnet
- Braithwaite and Guardhouse Community Association
- Brian Rhodes
- Brian White
- British Land
- British Waterways
- British Wind Energy Association
- Broadway Malyan
- Brooke Properties
- Brookhouse Group
- Bruce Barnes
- Bullroyd Allotments Association
- Burnett Planning & Development
- Buttershaw Business and Enterprise College
- BWEA
- C Cousins
- Calderdale Council
- Carl Rogrigues
- Carter Jonas
- CB Richard Ellis
- CBRE
- Ceri Lloyd

- Clayton Forum and Watch
- Cnet - Development Officer
- Cnet - Development Officer
- Colin Appleyard - Otley Road, Bradford
- Colliers CRE
- Colliers CRE
- Commercial Estates Group
- Covanta Energy Ltd
- CPRE Bradford District
- Craven Council
- Cunningham Planning
- D Inskip
- Dacre Son and Hartley
- Dacre Son and Hartley (Ilkley Office)
- Dale Cordingley
- Dave Rayner
- David Hemsley
- David Hill
- David Metclaf
- David Moncaster
- David Smith
- Delphine Dorgu
- Denholme Community Association
- Denholme Community Association
- Denholme Town Council
- Denholme Town Council
- Denholme Town Council
- Denholme Town Council
- Directions Planning Consultancy
- Divers Jonas
- DLP Consultants
- DPP
- DPP LLP
- Dracup Lodge Day Nursery
- Drivers Jonas
- Drivers Jonas (Agents for Arnold Laver)
- Drovers Way Resident Group
- Early Years & Childcare Service (CBMDC)
- Eddisons
- Edna Furnace
- Eldwick Memorial Hall Trust
- ENERGOS
- English Heritage
- Enterprise Europe
- Environment Agency
- Environment Agency
- Erinaceous Planning
- Esholt Committee
- Esholt Sports & Leisure Ltd
- Esholt Sports & Leisure Ltd
- Fairport Engineering Ltd
- Fairtrade Bradford
- Faxfleet Residents Association
- Firstplan
- FLP
- Forster Community College
- Fox Land & Property
- Frances Horne
- Frank Kirk
- Friends of Buck Wood
- Friends of High Crag & Poplar Crescent
Tenants & Residents Association
- Friends of Lister Park
- Friends, Families and Travellers and Traveller
Law Reform Project
- Fusion Online Ltd
- Future Energy Yorkshire
- G L Hearn
- Gareth Tattersall
- George Wimpey West Yorkshire Ltd
- Gilly Hoyle
- Ginny Wilkinson
- GL Hearn
- GL Hearn
- GL Hearne
- Gordon Dey
- Gough Planning Services
- GP Holme Wood
- Grange Technology College
- Greenstar
- Groundwork
- GVA Grimley
- GVA Grimley
- GVA Grimley
- H.B.P Residents Association
- Habinteg Housing Association
- Hallam Land Management Limited
- Hartley Planning Consultants
- Harvey Bosomworth
- Heidi Sobers
- Highfield Healthy Lifestyle
- Highways Agency
- Highways Agency
- Highways Agency

- Hirstwood Regeneration
- Holme Christian Community
- Holme Church / Holme Christian Community
- Holybrook Primary School
- Homes and Communities Agency
- Honley Properties
- Housing 21
- Iain Mann
- Ian & Lisa Dowson
- Ian Lambert
- Ian Naylor
- Ilkley Civic Society
- Ilkley Civic Society/Friends of the Manor House
- Incommunities
- Incommunities
- Incommunities
- Indigo Planning
- ISIS Project
- Jackie Hopwood
- Jacobs
- James Reddington
- Januarys
- Jason Beckett
- Jason Taylor
- Jeff McQuillan
- Jobs @
- Joe Kemp
- Joe Varga
- John Barrans
- John Bolland
- John Bretherick
- John Crosse
- John Finnigan
- John Gledhill
- John Muddiman
- Jones Homes (Northern) Ltd
- Jones Lang LaSalle
- Joy Smith
- JWPC Limited
- Kalbinder Singh
- Karen Moore
- Karl Paynes
- Keighley Town Council
- Keighley Town Council
- Keighley Town Council
- Khidmat Centre
- Kingsturge
- Kirkwells
- Kirsty Hitchon-Anderson
- Kurt Kunz
- Lambert Smith Hampton
- Lancashire CC
- Land and Development Practice
- Laura Haworth
- Leeds City Council
- Leith Planning
- Lesley Bosomworth
- Let Wyke Breathe
- Levvel
- Liverpool Council
- Local Government Yorkshire & Humber
- Low Moor Local History Group
- Lynn Asquith
- Manningham Masterplan
- Marian Taylor
- Martin Walsh Associates
- MENCAP
- Menston Community Association
- Menston Community Association
- METRO
- Michael Branford
- Michael Smith
- Mike Allcock
- Mike Dando
- Miller Homes
- Mintineau
- Mono Consultants
- Morston Assets
- Mossdale Residents Community Group
- Mr & Mrs Green
- Mr Battersby
- Mr Varley
- National Federation of Gypsy Liason Groups
- Natural England
- Neil Wrathmell
- New Horizons in the Community
- New Testament Church of God
- Newlands Community Association
- Newlands Community Transport
- NJL Consulting
- North British Housing Association
- North Yorkshire County Council

- Northern Trust
- Oakenshaw Residents' Association
- PACT Coordinator
- Parks and Landscape Service
- Pat A Smith
- Patchett Homes Ltd
- Patient Public Involvement (Bradford Teaching Hospitals)
- Penny Richards
- People First Keighley and Craven
- Permission Homes
- Peter Carruthers
- Peter Jackson
- Places for People Homes
- Planning 1
- Planning Potential
- Planning Potential
- Pondsides Neighbours Group
- Prospective Labour Candidate
- Quarry Products Association
- Ramblers Association
- Rance Booth and Smith
- Rapleys
- Robinson Architects
- Rollinson Planning Consultancy
- Roundwood Associates
- Royds Advice Services
- RSPB Yorkshire
- Saltaire United Reform Church
- Saltaire Village Society
- Saltaire Village Society
- Saltaire Village Society
- Saltaire Village Society
- Sanctuary Housing Association
- Sanderson Wetherall
- Sarah Henderson
- Save Horsfall Playing Fields
- Save us Pub
- Scholemoor Beacon
- Scott Wilson
- Sedbergh Youth & Community Centre
- Shelia Robinson
- Shelter Yorkshire & NE Regional Office
- Shipley Fairtrade Group
- Silsden Town Council
- Simon Balding
- Simon East
- Simon Lewis
- Simon Morgan
- Slensingford Area Residents Association
- South Bradford Community Network
- Southmere Primary School
- Spawforths
- Spawforths
- Spawforths
- Spawforths
- Sport and Leisure Service
- Sport England
- St Marys Residents Association
- Submitted land - Call for sites
- Sunningdale & Manor Park NHW
- Sutton Community Association
- Taylor Wimpy
- Taylor Young
- The Abbeyfield Bradford Society
- The Arley Consulting Company Ltd
- The Coal Authority
- The Homekey Project
- The Land and Development Practice
- The Lawn Tennis Association
- The Salvation Army
- The Theatres Trust
- The William Sutton Housing Association
- Touchstone
- Townsend Planning
- Trish Lambert
- Turley Associates
- Turley Associates
- Turley Associates
- Turley Associates
- Turley Associates
- Turley Associates
- Turley Associates
- Turley Associates
- United Cooperatives
- Upper Heaton Working Together Group
- Waddington Recycling Ltd
- Walker Morris
- Walton and Co
- Walton and Co
- West Yorkshire Ecology
- West Yorkshire Fire and Rescue
- West Yorkshire Police
- Westlake and Co.
- Wharfedale Friends of the Earth

- White Young Green
- William Lakin
- Woodlands Cricket Club - Oakenshaw
- WYAAS
- WYG
- YH Assembly
- Yorkshire and Humber Transport Roundtable
- Yorkshire Housing Limited/Brunel Housing
- Yorkshire Planning Aid
- Yorkshire Rural Community Council
- Yorkshire Water
- Yorwaste Ltd
- Yorwaste Ltd
- Youth Service
- Yvette Guy

Department of Regeneration & Culture

Local Development Framework Group

8th Floor Jacobs Well
Manchester Road
Bradford BD1 5RW

Tel: (01274) 434050

Fax: (01274) 433767

Email: ldf.consultation@bradford.gov.uk

Date: Friday 28th October 2011

Dear [CONSULTEE]

**RE: BRADFORD DISTRICT LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY DPD: FURTHER ENGAGEMENT DRAFT (REGULATION 25)**

I am writing to inform you that the Council has published the Core Strategy DPD: Further Engagement Draft document and background documents for public consultation.

The Core Strategy aims to build upon previous public consultations and addresses the scale and distribution of development needed across the District over the next 15 – 20 years. It sets out the strategy for the identification of broad locations for new housing, employment and transport investment, as well as identifying broad areas where land should be protected from development. The document does not identify specific sites for development, but it will influence how development will be distributed across the District.

It introduces the Council's proposed approach in relation to the development of detailed planning policies that will eventually guide development and investment proposals within the Bradford District until 2028. Once adopted, it will form part of the District's emerging development plan – the Local Development Framework (LDF).

Evidence Base

Alongside the Core Strategy, the Council has published a range of evidence base reports which have informed the approach adopted. These reports can be viewed on the Council's website at: www.bradford.gov.uk/LDF then click 'Evidence Base'.

Aim of the consultation

This current round of consultation seeks to gather the views of local communities, stakeholders and statutory consultees on the scope and content of the Further Engagement Draft document, background documents and the evidence base.

Summary Leaflet

A 'Summary Leaflet' is available which provides a concise outline of the content and approach of the consultation document. This is available on our website for you to download.

**This consultation will last for twelve weeks, starting on 28th October 2011.
The consultation ends at 4pm on Friday 20th January 2012.**



City of Bradford
Metropolitan District Council



Where can I find the consultation documents?

The consultation document, summary leaflet and background documents can be viewed online at: www.bradford.gov.uk/LDF by clicking on either 'Core Strategy DPD' or 'Evidence Base'.

Alternatively, reference copies can be viewed at the following deposit locations within the Bradford District:

- Main libraries: Bradford Central Library, Shipley, Bingley, Keighley and Ilkley.
- Town Halls & One Stop Shops: at Shipley, Keighley and Ilkley;
- Planning Office at Jacob's Well, Bradford.

How to make comments

Your views and comments are welcomed and will be taken into account when producing the next stage of the Core Strategy – the Submission Draft.

Please submit your representation on a **Comment Form** then send it to us:

By Email: ldf.consultation@bradford.gov.uk

The Council is keen to promote the submission of comments electronically via an e-mail attachment to reduce the amount of paper used. We would encourage anyone with appropriate facilities to make their responses in this way.

By Post: Alternatively, send your completed Comment Form to the 'Freepost' address below:

**Bradford Local Development Framework
FREEPOST NEA 11445
PO BOX 1068
BRADFORD
BD1 1BR**

By Fax: Comment forms can also be faxed to: **(01274) 433767**

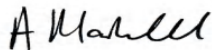
Please Note: Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purpose of preparing the Local Development Framework (LDF).

Consultation 'Drop-In' Events

The Council have organised a number of public 'drop-in' events across the District to allow discussion of the Further Engagement Draft on a one-to-one basis. The details of these events are available on the website: www.bradford.gov.uk/LDF under 'Current Consultations'.

Should you have any queries in relation to this consultation please phone: (01274) 434050 or 433679.

Yours faithfully,



Andrew Marshall
Planning and Transport Strategy Manager

APPENDIX 3: DETAILS OF MEDIA AND PRESS RELEASES SURROUNDING THE FURTHER ENGAGEMENT DRAFT CONSULTATION (2011 – 2012)

| Date | Newspaper | Page | Article Title |
|--------------|---------------------|-------------|---|
| 22 Sept 2011 | Ilkley Gazette | 3 | 3,000 new homes 'will be needed in the Ilkley area' |
| 23 Sept 2011 | Telegraph and Argus | 1-3 | 45,500 homes 'needed' in the next 27 years |
| 29 Sept 2011 | Keighley News | 4 | Anger over plan to build 9,750 homes in District |
| 29 Sept 2011 | Ilkley Gazette | 4 | Draft Plan for homes to be debated |
| 6 Oct 2011 | Ilkley Gazette | 2 | 'Join in consultation on new houses' |
| 13 Oct 2011 | Yorkshire Post | 10 | Public to get say on plans blueprint |
| 13 Oct 2011 | Ilkley Gazette | 23 | Councillor calls for action over plans for thousands more homes. |
| 20 Oct 2011 | Ilkley Gazette | 2 | Councillors call on residents to unite in battle for green land |
| 24 Oct 2011 | Telegraph and Argus | 4 & 5 | Plans drawn up for how Council will hit demands for homes |
| 27 Oct 2011 | Keighley News | 17 | 'Locals need a voice on housing' |
| 10 Nov 2011 | Ilkley Gazette | 7 | We don't want to be like Monte Carlo – councillor |
| 14 Nov 2011 | Telegraph and Argus | 19 | |
| 17 Nov 2011 | Keighley News | 22 | Views wanted on development |
| 17 Nov 2011 | Ilkley Gazette | 2 | 'Don't miss this chance to help shape town's future' |
| 17 Nov 2011 | Ilkley Gazette * | 19 | Council mistakes throws doubt on housing sites |
| 24 Nov 2011 | Ilkley Gazette | 1 | Green spaces marked as part of homes plan |
| 24 Nov 2011 | Ilkley Gazette | 4 | Council to set out new blueprint for planning |
| 29 Nov 2011 | Telegraph and Argus | 9 | Letter from Councillor L'Amie – Increase in housing will lead to road chaos |
| 29 Nov 2011 | Telegraph and Argus | 10 | Focus on Wharfedale Planners urged to remember tourism |
| 30 Nov 2011 | Telegraph and Argus | | |
| 1 Dec 2011 | Telegraph and Argus | 10 | Focus on Bradford Masterplan aims to transform city centre |

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|-------------|---------------------|----|--|
| 6 Dec 2011 | Telegraph and Argus | 5 | 'Roads and stations needed for growth' |
| 7 Dec 2011 | Telegraph and Argus | 5 | Are rail improvements on track to help regenerate the district? |
| 8 Dec 2011 | Telegraph and Argus | 16 | Focus on Addingham (1/27) 'We don't need 400 new village houses' |
| 9 Dec 2011 | Telegraph and Argus | 8 | Building up to a population boom |
| 9 Dec 2011 | Telegraph and Argus | 9 | Letter – Cities would not join (Councillor Michael Johnson) |
| 9 Dec 2011 | Telegraph and Argus | 16 | Focus on Baildon (2/27) 'Roads would not cope with homes' |
| 10 Dec 2011 | Telegraph and Argus | | Focus on Bingley (3/27) |
| 12 Dec 2011 | Telegraph and Argus | 10 | Focus on Bradford City Centre (4/27) City Centre homes' won't fill the gap' |
| 13 Dec 2011 | Telegraph and Argus | 16 | Focus on Bradford North East (5/27) 'Homes for the Elderly needed'. |
| 14 Dec 2011 | Telegraph and Argus | 12 | Focus on Bradford North West (6/27) Green belt concerns raised |
| 15 Dec 2011 | Ilkley Gazette | 4 | Residents speak out against Council's housing proposals |
| 15 Dec 2011 | Keighley News | 15 | Debate on plans for hundreds of homes |
| 15 Dec 2011 | Keighley News | 20 | Residents fight new building proposals |
| 15 Dec 2011 | Telegraph and Argus | 14 | Focus on Bradford South East (7/27) 'We need more people in city' |
| 16 Dec 2011 | Telegraph and Argus | 16 | Focus on Bradford South West (8/27) Derelict sites may be used |
| 19 Dec 2011 | Telegraph and Argus | 14 | Focus on Canal Road Corridor (9/27) Canal corridor earmarked for major housing |
| 20 Dec 2011 | Telegraph and Argus | 16 | Focus on Cottingley (10/27) Village would be 'suffocated' |
| 21 Dec 2011 | Telegraph and Argus | 14 | Focus on Cullingworth (11/27) 'We need to stop village traffic chaos' |
| 21 Dec 2011 | Telegraph and Argus | 9 | Homes Threat to precious greenbelt |
| 22 Dec 2011 | Telegraph and Argus | 14 | Focus on Denholme (12/27) 'Brownfield sites must be our priority' |
| 22 Dec 2011 | Ilkley Gazette | 8 | Fears transport links will not support new homes |

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|-------------|---------------------------|----|---|
| 22 Dec 2011 | Craven Herald and Pioneer | 25 | Group sees red over blueprint |
| 22 Dec 2011 | Keighley News | 8 | Field may not be built on, says Council |
| 23 Dec 2011 | Telegraph and Argus | 14 | Focus on East Morton (13/27) 'This is just destroying the neighbourhood' |
| 23 Dec 2011 | Telegraph and Argus | 9 | <i>Letter from Councillor Simon Cook</i> Now is not the time to use up the greenfields |
| 23 Dec 2011 | Telegraph and Argus | 9 | Sites that should not be used for houses |
| 24 Dec 2011 | Telegraph and Argus | | Focus on XXXX (14/27) |
| 26 Dec 2011 | Telegraph and Argus | 16 | Focus on Haworth (15/27) |
| 27 Dec 2011 | Telegraph and Argus | 14 | Focus on Ilkley (16/27) |
| 27 Dec 2011 | Yorkshire Post | 8 | Bradford Council is currently consulting on its Local Development Framework Core Strategy |
| | Telegraph and Argus | | Focus on XXXX (17/27) |
| 28 Dec 2011 | Telegraph and Argus | 12 | Focus on Keighley (18/27) 'Building more homes could bring in investment' |
| 28 Dec 2011 | The Independent | - | Withering Heights? Green Belt homes set for Bronte country |
| 29 Dec 2011 | Telegraph and Argus | 10 | Focus on Menston (19/27) 'Don't wreck our golden green acres' |
| 29 Dec 2011 | Craven Herald | 13 | Village groups calls meeting on housing |
| 29 Dec 2011 | Ilkley Gazette | 4 | Villages to be consulted |
| 29 Dec 2011 | Ilkley Gazette | 6 | 'Get old houses in order' is the call from social landlord |
| 29 Dec 2011 | Ilkley Gazette | 6 | Civic society calls for a strong response to plan |
| 30 Dec 2011 | Telegraph and Argus | 12 | Focus on Oakworth (20/27) 'New homes mean more congestion' |
| 31 Dec 2011 | Telegraph and Argus | 2 | |
| 31 Dec 2011 | Telegraph and Argus | 12 | Focus on Oxenhope (21/27) |
| 02 Jan 2012 | Telegraph and Argus | 11 | Coun Dale Smith has warned against 'Cherry Picking' green-belt land for new homes in the Wharfe Valley under the Local Development Framework. |
| 02 Jan 2012 | Telegraph and Argus | 14 | Focus on Keighley (22/27) |
| 03 Jan 2012 | Telegraph and Argus | 10 | Focus on Shipley (23/27) Former industrial sites 'have lots of potential' |
| 04 Jan 2012 | Telegraph and Argus | 2 | Keep up fight against new homes |

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|-------------|---------------------|-----|---|
| 04 Jan 2012 | Telegraph and Argus | 16 | Focus on Silsden (24/27) Town would grow by a half under framework |
| 05 Jan 2012 | Telegraph and Argus | 4 | Strategy comment period is extended |
| 05 Jan 2012 | Telegraph and Argus | | Focus on Steeton-with-Eastburn (25/27) 'Village identified as hub for commuter' |
| 05 Jan 2012 | Ilkley Gazette | 6 | Five stories on Bradford Council's Local Development Framework plans for Wharfedale |
| 05 Jan 2012 | Keighley News | 22 | Homes proposal is 'deliverable' |
| 06 Jan 2012 | Telegraph and Argus | 15 | Bid to build 2,700 homes supported |
| 06 Jan 2012 | Telegraph and Argus | 16 | Focus on Thornton (26/27) 'We would be stretched even more by building' |
| 06 Jan 2012 | Planning Magazine | | West Yorkshire Council's row over Core Strategy |
| 06 Jan 2012 | BBC News Online | N/A | West Yorkshire councils clash in housing development row |
| 07 Jan 2012 | Telegraph and Argus | 14 | Focus on Wilsden (27/27) |
| 07 Jan 2012 | Telegraph and Argus | 15 | Silsden Plan |
| 09 Jan 2012 | Telegraph and Argus | 5 | Have say on 5,000 homes |
| 10 Jan 2012 | Telegraph and Argus | 9 | Letters – District not in need of so many homes |
| 11 Jan 2012 | Telegraph and Argus | 2 | Committee formed over homes plan |
| 11 Jan 2012 | Telegraph and Argus | 7 | 'Residents views ignored by Council' |
| 12 Jan 2012 | Keighley News | 8 | Silsden Town Council is asking residents for their views as part of efforts to create a new town plan. The plan, which will help guide its future development, will provide information for Bradford Council's district development plan. |
| 12 Jan 2012 | Keighley News | 24 | Bradford Council is holding a public consultation in Keighley on 24 January to discuss proposals put forward as part of the Local Development Framework. |
| 12 Jan 2012 | Ilkley Gazette | 3 | A packed public meeting at Addingham Memorial Hall debated housing proposals under the Local Development Framework Core Strategy. |
| 12 Jan 2012 | Ilkley Gazette | 3 | A packed public meeting at Addingham Memorial Hall debated housing proposals under the Local Development Framework Core Strategy. |
| 12 Jan 2012 | Ilkley Gazette | 6 | Anti-green belt housing group, the Wharfedale and Airedale Review Development, has criticised plans in Bradford Council's Local Development Framework. |
| 12 Jan 2012 | Ilkley Gazette | 10 | Letter about large housing plan for Menston. Letter about housing development on green belt land. |
| 12 Jan 2012 | Ilkley Gazette | 13 | Bradford Council is to expand its consultation on the Local Development Framework |
| 12 Jan 2012 | Craven Herald | 15 | Silsden residents are to be asked their views over the new town plan which will provide information for Bradford Council's district development plan |

| | | | |
|-------------|-------------------|----|--|
| 16 Jan 2012 | Yorkshire Post | 8 | Land in Bradford could be earmarked for 2,700 homes despite concerns the proposal could lead to boundaries between the city and Leeds becoming blurred |
| 16 Jan 2012 | Telegraph & Argus | 11 | Queensbury residents are being encouraged to take part in a consultation event about the Local Development Framework draft Core Strategy on Wednesday. |
| 19 Jan 2012 | Craven Herald | 25 | Villagers concerned about plans to build 400 houses in Addingham had to be turned away from a packed meeting attended by more than 200 people. Concerns were raised about parking, traffic, flooding, pressure for school places, urban sprawl and the difficulties of creating truly affordable housing |
| 19 Jan 2012 | Ilkley Gazette | 6 | The consultation period on Bradford Council's Local Development Framework Core Strategy ends soon. |
| 19 Jan 2012 | Keighley News | 22 | Oxenhope Parish Council chairman Neal Cameron said the Local Development Framework, which includes Oxenhope and the Worth Valley, is contradictory |
| 20 Jan 2012 | Telegraph & Argus | 9 | Letter about the Local Development Framework and the impact housing developments could have |
| 31 Jan 2012 | Telegraph & Argus | 15 | Addingham Civic Society and Ilkley Civic Society have spoken out against over-development in response to Bradford Council's consultation on its Local Development Framework |
| 01 Feb 2012 | Telegraph & Argus | 9 | Letter doubting the need for 45,000 homes to be built in the District |
| 02 Feb 2012 | Ilkley Gazette | 12 | Letters on LDF |
| 02 Feb 2012 | Craven Herald | 8 | The new Addingham Civic Society website has gone live. The Society has 185 email addresses of residents who want to keep up to date on the Council's Local Development Framework. |
| 03 Feb 2012 | Telegraph & Argus | 13 | Coun Ian Greenwood, Council Leader, has hit back at criticism from a Leeds councillor about the potential for up to 900 homes being built in Menston, as outlined in the draft Core Strategy of the Local Development Framework. |
| 03 Feb 2012 | Telegraph & Argus | 13 | Ilkley Parish Council has warned the town could not cope with the scale of possible development outlined in the Local Development Framework. It has made a formal response to Bradford Council's draft Core Strategy. |
| 03 Feb 2012 | Yorkshire Post | 1 | More than 11,000 homes could be built on green belt land across Yorkshire as developers say they need sites to meet expected population increases. Concerns have been raised that city boundaries between Leeds and Bradford could be merged if significant housing development is approved at Holme Wood and Menston in order to meet Bradford's need for an extra 45,000 homes up to 2028. |
| 07 Feb 2012 | Telegraph & Argus | 15 | A public meeting is being held in Silsden on 21 February to discuss Bradford Council's proposed LDF. |
| 14 Feb 2012 | Telegraph & Argus | 13 | Oxenhope Parish Council has discussed its objections to the Council's LDF and will submit its comments to the Council by the end of this month. |

City of Bradford Metropolitan District Council

www.bradford.gov.uk

Environment

Core Strategy DPD: Further Engagement Draft

Friday 28th October 2011 - Friday 20th January 2012

Consultation deadline extended to 4pm on Wednesday 29th February 2012

The Core Strategy Development Plan Document (DPD) is a key planning document within the LDF which concerns all residents, businesses and interested parties within Bradford District as it:

- Sets out a long-term spatial vision for the District until 2028
- Identifies broad locations for development over the next 15 years
- Sets out policies that will influence the use of land and the type and scale of development which will be permitted within the District
- Identifies infrastructure required to manage development.

Background to the Core Strategy DPD:

The Council last consulted on the Core Strategy - Further Issues and Options in 2008. At this stage, 4 spatial options were presented for the location of housing and economic development over the plan period. The Council received over 400 comments to these options and these have taken these into consideration along with further evidence to support the preparation of the Further Engagement Draft document.

Since 2008, changes to Government legislation and uncertainty over regional planning have held up the LDF, but this situation has allowed us to reassess and update our evidence base. This has been invaluable in moving to this next stage in the plan making process to ensure our plan is both sound and robust.

Further Engagement Draft - Consultation






This consultation presents the Council's further engagement draft of the Core Strategy which sets out the proposed preferred approach for addressing the issues within the District where planning can make a real difference to the lives of communities. This plan can influence housing, employment, community facilities and infrastructure developments, as well as how we use, protect and conserve our natural environment and built heritage.

The Council's Executive Committee gave approval for a 12 week consultation period at the meeting on Friday 14th October 2011.

Core Strategy DPD Consultation Document:

-  [Core Strategy DPD: Further Engagement Draft pdf \(15851kb\)](#)

Background Documents:

-  [Core Strategy DPD - Summary leaflet pdf](#)
-  [Core Strategy DPD – Engagement Plan \(1,232kb\)](#)
-  [Core Strategy DPD – Issues & Options – Statement of Consultation \(6,394kb\)](#)
-  [Interim Sustainability Appraisal \(SA\) 2011 \(1453Kb\)](#)
- Core Strategy DPD – Equality Impact Assessment Documents - Evidence Base
-  [Core Strategy - Minerals Evidence Base Report pdf](#)

Video Production

The Council commissioned a short video production to raise awareness of the Core Strategy consultation and some of the key planning issues facing the Bradford District. The production will run for approximately 20 minutes. If you would like to view the video, please click on the link below.

[View the video production](#)

Information leaflets

- [Changes to the Planning System \(774 kb\)](#)
- [Guide to the Core Strategy \(2 Mb\)](#)
- [Jargon Buster \(675 kb\)](#)

Evidence Base

The technical studies and reports which have informed the proposed approach within this consultation document are listed below and can be found under [Evidence Base](#).

- [Affordable Housing Economic Viability Assessment \(AHEVA\)](#)
- [Core Strategy Baseline Analysis Report](#)
- [District Transport Study](#)
- [Employment Land Review & Update](#)
- [Open Space, Sports and Recreation Assessment](#)
- [Landscape Character Assessment SPD](#)
- [Local Economic Assessment \(LEA\)](#)
- [Local Infrastructure Plan & Baseline Analysis Report](#)
- [Retail and Leisure Study](#)
- [Strategic Flood Risk Assessment \(SFRA\)](#)
- [Strategic Housing Land Availability Study \(SHLAA\)](#)
- [Strategic Housing Market Assessment \(SHMA\)](#)

Technical Consultation Events (Invitation only)

The Council are holding a series of technical events for targeted stakeholders to consult them on the proposals in the Further Engagement Draft document. These sessions are as follows:

| Technical Events Dates | Time | Topic | Venue |
|---|-----------|----------------|------------------------------|
| Thursday 17 th November 2011 | 10am – 12 | Economy & Jobs | City Hall, Bradford, BD1 1HY |
| Friday 18 th November 2011 | 10am – 12 | Housing | City Hall, Bradford, BD1 1HY |
| Friday 18 th November 2011 | 2 - 4pm | Transport | City Hall, Bradford, BD1 1HY |
| Monday 21 st November 2011 | 10am – 12 | Environment | City Hall, Bradford, BD1 1HY |
| Monday 21 st November 2011 | 2 – 4pm | Minerals | City Hall, Bradford, BD1 1HY |
| Monday 28 th November 2011 | 10am - 12 | Infrastructure | City Hall, Bradford, BD1 1HY |

Area 'Drop-In' Consultation Events

The Council are holding a number of drop-in events across the Bradford District for local residents and other interested parties to find out more about the proposed strategy and to have their say on the Further Engagement Draft document. These sessions are as follows:

| Area Events Dates | Time | Venue |
|--|------------|--|
| Tuesday 22 nd November 2011 | 12 – 7pm | Thornbury Centre, Leeds Old Road, Bradford, BD3 8JX |
| Wednesday 23 rd November 2011 | 12 – 7pm | National Media Museum, Bradford, BD1 1NQ |
| Thursday 24 th November | 12 - 7pm | Shipley Town Hall, Kirkgate, Shipley, BD18 3EJ |
| Friday 25 th November 2011 | 12 – 7pm | Richard Dunns Sports Centre Rooley Lane, Bradford, BD6 1EZ |
| Saturday 26 th November 2011 | 10am – 4pm | National Media Museum, |

| | | |
|---|----------|--|
| | | Bradford, BD1 1NQ |
| Tuesday 29 th November 2011 | 12 – 7pm | Kings Hall, Station Road, Ilkley, LS29 98H |
| Friday 2 nd December 2011 | 12 – 7pm | Temple Row Centre 23 Temple Row, Keighley, BD21 2AH |
| Tuesday 17 th January 2012 | 4 – 7pm | Cardigan House Ferncliffe Road, Bingley, BD16 2TA |
| Wednesday 18 th January 2012 | 4 – 7pm | Victoria Hall (Children’s Centre) Station Road, Queensbury, BD13 1AB |

How to comment

Your views and comments are welcomed and will be taken into account when producing the next stage of the Core Strategy DPD – the Submission Draft.

Please note: The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.

Please use a comment form to submit your comments – this can be downloaded in Microsoft Word format below:

- [Comment Form and Guidance Note \(275kb\)](#)
- [Additional Comment Sheet - Part B – Your Representation \(235kb\)](#)
- [Additional Comment Sheet - Part C – Your Comments \(230kb\)](#)
- [Part D - Equality and Diversity Monitoring Form \(230kb\)](#)

How to submit your comments

Please send your completed Comment Form, preferably by email to the LDF Group:
ldf.consultation@bradford.gov.uk;

Alternatively send them by post to the following FREEPOST address:

**Bradford Local Development Framework
FREEPOST NEA 11445
PO Box 1068
BRADFORD
BD1 1BR**

By Fax: **01274 433767**

Consultation deadline update: The consultation deadline has been extended from Friday 20th January 2012 until 4pm on Wednesday 29th February 2012. This new informal deadline is to allow for extra time for comments to be submitted to the Council. All comments received by this date will be recorded and taken into consideration.

Data Protection Act 1998: Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purpose of preparing the Local Development Framework (LDF).

Further information

If you have any further questions about this consultation please contact the LDF Group on:

- Telephone: 01274 433679
- Text phone: 01274 432499
- Email: ldf.consultation@bradford.gov.uk

Further information about the Local Development Framework is available on this website:
www.bradford.gov.uk/LDF.






Planning Aid England (PAE) provides a free, independent and professional planning advice service to individuals and groups who cannot afford professional fees. The organisation may be able to assist groups and individuals who would like support and advice in order to get involved in this consultation process.

Contact the PAE Community Outreach Coordinator for further information:

Tel: 0781 268 2797

Email: mike.dando@planningaid.rtpi.org.uk

Website: <http://www.rtpi.org.uk/planningaid/>

-  [Core Strategy DPD - Introduction](#)
-  [Core Strategy DPD - Issues and Options Stage](#)
-  [Core Strategy DPD - Further Issues and Options](#)

Related Links

-  [Local Development Framework homepage](#)
-  [Planning Service homepage](#)

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Plan-it Bradford

Issue 14 NOVEMBER 2011

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

This bumper edition of Plan-it Bradford brings you important information regarding two separate public consultations which are currently taking place which you may wish to get involved in. Have your say on the future of your District to 2028!

Waste Management DPD: Revised Preferred Approach
10 October 2011 to 18 December 2011

Core Strategy DPD: Further Engagement Draft
28 October 2011 to 20 January 2012

The Waste Management DPD is a key document within Bradford's LDF which will bring about a change in the way the Council and its stakeholders deal with waste, both within the District and beyond until 2028.

This plan will ensure that the District has sufficient and appropriate waste infrastructure to deliver the Council's aspirations for self-sufficiency. This includes:

- The identification of sites to accommodate waste management facilities
- Criteria based policies for the management of waste streams
- Policies for the management of waste in developments throughout the District, and
- A framework for the effective delivery and monitoring of those policies.

Waste Management DPD: Revised Chapter 5 Consultation

Public Consultation – have your say on the future of your waste! Revised Chapter 5 Consultation for the Waste Management DPD: Preferred Approach

In January 2011, the Council published the Waste Management DPD: Preferred Approach for public consultation. By the end of the 10 week consultation period the Council had received over 300 representations on the consultation documents. Whilst the comments received related to a range of matters and issues, a significant number them related to the proposed shortlisted waste sites.

All the comments received during the public consultation have been documented within a Summary of Representations document which is available to view on our website.

The Council has considered the comments received. In response, a number of changes are proposed to the site assessment methodology and additional sites put on the long list of sites. All potential sites on the long list have been re-assessed, including new sites put forward to the Council as part of the consultation. This has resulted in a revised shortlist of sites.

It is important that the revised shortlist of sites is subject to public consultation before the Council moves to the next stage of the statutory process. This will ensure that a robust engagement process is undertaken prior to the submission to examination.

Consultation Period:
Mon 10 October -
Mon 19 December 2011

www.bradford.gov.uk/ldf

City of Bradford MRC

Core Strategy DPD Consultation - Further Engagement Draft

Consultation Dates: 28 October 2011 to 20 January 2012

The Council has commenced public consultation on the 'Further Engagement Draft' of the Core Strategy DPD.

This consultation follows on from extensive community engagement which took place in 2007 and again in 2008 on the 'Issues and Options' for Bradford. The Council has considered all of the comments received during these consultations in addition to emerging evidence and have now produced the Further Engagement Draft document for public consultation.

The 'Further Engagement Draft' sets out the proposed strategy to manage development and change within the Bradford District to 2028. The strategy:

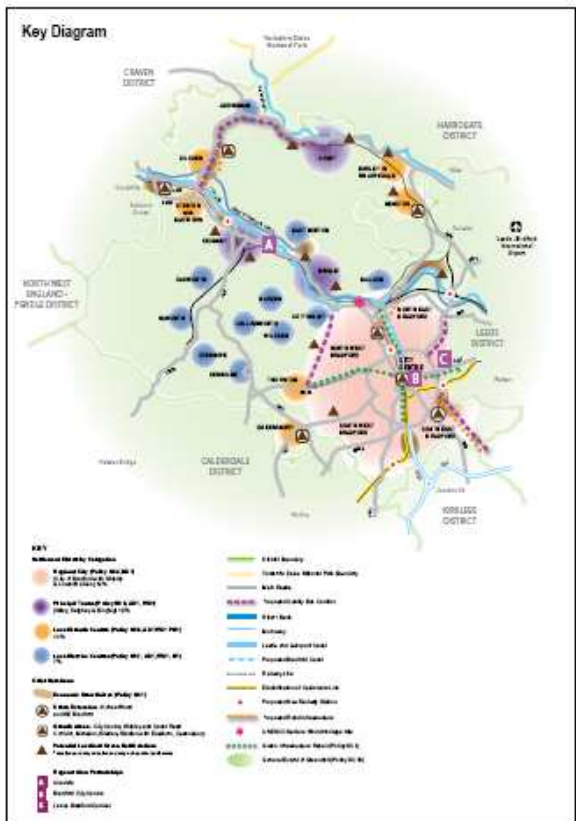
- Sets out a long-term spatial vision and a set of objectives for the District until 2028.
- Identifies broad locations for development over the next 15 years.
- Sets out policies that will influence the use of land and the type and scale of development which will be permitted within the District.

We recommend that you read this document to gain a full understanding of the draft strategy and the justification. The key diagram (page 4) highlights broad locations for growth along with the key messages about the content and approach of this document.

Further Engagement Draft - Key Messages

- Bradford's Local Development Framework (LDF), which includes the Core Strategy, is important to everyone as it is about managing development and growth in a sustainable way that benefits residents and the local economy both now and in the future.
- We need a thorough and robust plan to protect land and to provide clear guidance as to types and place of development.
- This consultation is the latest stage in a long and detailed process which sets out the broad policies that will determine future use of land for housing, employment, health and wellbeing, education, leisure, transport and infrastructure purposes through to 2028.
- This document does NOT determine or allocate specific sites for development. It only identifies broad locations where development should go in the future. It will be the role of the Allocations DPD to allocate specific sites. The Allocations DPD will be prepared in line with the Core Strategy at a slightly later date and will be subject to its own independent examination.
- This consultation document includes draft policies addressing the potential impact on the infrastructure of each area within the District. The policies are set out under the following themes:
 - Planning for Prosperity - Economy and Jobs
 - Transport and Movement
 - Planning for People - Transport and Housing
 - Planning for Places - Environment
- These policies set out that Brownfield land and building at relatively high densities will remain as the priority for development within the District and that the amount of greenfield and greenbelt land required for any kind of development will be minimised.
- Sites will be released for development in phases over time, with the need for any Greenfield or greenbelt land held back until the later stages of the plan period.
- The document sets out a settlement hierarchy. This hierarchy makes it clear that the focus of future development must be the City of Bradford; then the 'Principal Towns' of Shipley, Ilkley and Keighley; then the 'Local Growth Centres' of Bailay-in-Wharfedale, Menston, Queensbury, Staden, Shepton and Thimston. The remaining smaller settlements or 'Local Service Centres' will receive a level of development which will meet the future needs of residents.
- The Council want to ensure that the right types of homes are in the right places at the right prices to meet the needs of the community. This will be achieved while recognising that we have a high-quality landscape that needs to be protected.
- The aims and outcomes of the Core Strategy will be determined by a number of factors outside of Council control, i.e. wider economic conditions and the state of the housing market.
- This consultation is targeted at local residents, communities, local organisations, businesses, stakeholders and statutory bodies such as Natural England, English Heritage and the Environment Agency.
- The Council welcomes any comments and observations you may have on this consultation document. Your comments will be considered and will help to shape the next version of the plan.

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Core Strategy: Further Engagement Draft Consultation Documents

There are a number of documents which form part of this consultation which you may wish to comment upon. The main one being the Core Strategy DPD: Further Engagement Draft.

Other documents relating to the Core Strategy DPD include:

- Engagement Plan
- Statement of Pre-Submission Consultation: Issues and Options Stage (Reg. 28)
- Initial Sustainability Appraisal Report
- Equality Impact Assessment
- A Summary Leaflet - 'Our District in 2028' will provide a concise summary of the consultation document.
- Several Evidence Base reports and studies have also been published to support this consultation; these are listed in the Evidence Base Update article.

All these documents will be available to download on the Council's website at: www.bradford.gov.uk/ldf under 'Current Consultation' during the consultation period.

LDF Consultations - How do I get involved?

The Council welcomes your views on both the Waste Management DPD and the Core Strategy DPD consultations.

Please ensure that you submit your comments using the relevant Comment Form. These are available to download from the LDF website.

Further information on both consultations is available on the LDF website: www.bradford.gov.uk/ldf under 'Current Consultation'.

Data Protection Notice: Please note that representations cannot be treated as confidential and the relevant data will be made available for public inspection and published on the Council's website. Personal details will not be made public, will be held by the Council and will not be made public.

Core Strategy Consultation Events

We will be holding a series of 'technical' and area based 'drop-in' events throughout November. These drop-in sessions will give you the opportunity to discuss the 'Further Engagement Draft' on an one-to-one basis with a member of staff. The dates and times for these events are:

Technical Events (for stakeholders only - prior booking is required)

| Technical Events Dates | Time | Topic | Venue |
|-----------------------------|-----------|------------------|------------------------------|
| Thursday 17th November 2011 | 10am - 12 | Economy and Jobs | City Hall, Bradford, BD1 1HY |
| Friday 18th November 2011 | 10am - 12 | Housing | City Hall, Bradford, BD1 1HY |
| Friday 18th November 2011 | 2 - 4pm | Transport | City Hall, Bradford, BD1 1HY |
| Monday 21st November 2011 | 10am - 12 | Environment | City Hall, Bradford, BD1 1HY |
| Monday 21st November 2011 | 2 - 4pm | Minerals | City Hall, Bradford, BD1 1HY |
| Monday 28th November 2011 | 10am - 12 | Infrastructure | City Hall, Bradford, BD1 1HY |

Area Drop-In Events (no booking required)

These events are open to everyone on a drop-in basis where you can come along and speak to an officer about the proposals and the consultation. No booking required.

| Area Events Dates | Time | Venue |
|------------------------------|------------|--|
| Tuesday 22nd November 2011 | 12 - 7pm | Stourhead Centre Bradford, BD3 5LZ |
| Wednesday 23rd November 2011 | 12 - 7pm | Central Library Bradford, BD1 1NQ |
| Friday 25th November 2011 | 12 - 7pm | Richard Dove Sports Centre Bradford, BD6 1ES |
| Saturday 26th November 2011 | 10am - 4pm | Central Library Bradford, BD1 1NN |
| Tuesday 29th November 2011 | 12 - 7pm | Kings Hall Ilkley, LS25 5BH |
| Wednesday 30th November 2011 | 12 - 7pm | Shipley Town Hall Shipley, BD15 3EJ |
| Friday 2nd December 2011 | 12 - 7pm | Temple Row Centre Keighley, SG21 2AR |

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APPENDIX 6:

CORE STRATEGY DPD: FURTHER ENGAGEMENT DRAFT – SUMMARY OF COMMENTS RECEIVED AND COUNCILS RESPONSE

FURTHER ENGAGEMENT DRAFT CONSULTATION – 28TH OCTOBER 2011 TO 29TH FEBRUARY 2012

SECTION 1 / 2 / 3 & STRATGIC CORE POLICIES

| BACKGROUND & CONTEXT | | |
|---------------------------------------|--|--|
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. The use of population projections. | 1. The Core Strategy should not be based on unrealistic population projections | The Government requires the Council to carry out a robust assessment of future housing need and to base these assessments on the official government projections of population and household change issued by the CLG and Office of National Statistics (ONS). The Council have commissioned a Housing Requirement Study to look in depth at the factors behind these projections such as patterns of migration and natural change and also other factors such as employment trends. This work will inform the final district wide housing requirement in the Core Strategy. |
| 2. Built heritage | Recognition of the contribution made by the built heritage of the District. | The comments of support are noted. |
| 3. Tourism | 1. Endorse the need to lift the appeal and quality of some cultural and tourist attractions. | The support for this part of the plan is acknowledged. |
| | 2. The Government and Council should | The National Planning Policy Framework requires the plan to meet |

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| | concentrate their efforts on reducing population growth to a sustainable level. | the "full, objectively assessed needs" for housing, at paragraph 47, and in the Bradford District necessitates planning for an increasing population. |
| | 3. The population projections in the FED and Base Analysis Report are inconsistent | The Core Strategy used the latest and most appropriate population estimates and projections available at the time of publication. |
| 4. The commuting patterns referred to in paragraph 2.81 are inadequately recorded. | | The Spatial Portrait of the Bradford District, in paragraphs 2.63 - 2.96 is not intended to be a complete and exhaustive description of spatial issues and components. The text in these paragraphs will be amended to better reflect the purpose of the section, including paragraphs 2.63 and 2.81. |
| 5. Failure to properly recognise the contribution of the Leeds & Liverpool Canal | 1. The Leeds & Liverpool Canal should be noted in paragraph 2.78 as a key form of transport infrastructure | The Spatial Portrait of the Bradford District, in paragraphs 2.63 - 2.96 is not intended to be a complete and exhaustive description of spatial issues and components. The text in paragraph 2.63 will be amended to better reflect the purpose of the section. |
| | 2. The Leeds & Liverpool Canal should be noted in paragraph 2.93 as a key element of the built heritage | Reference to the Leeds & Liverpool Canal has been included in the revised Built Heritage text. |
| | 3. The Leeds & Liverpool Canal should be noted in paragraph 2.95 as a major cultural and tourist attraction | Reference to the built heritage of the District, of which the Canal is a part, has been included in the cultural attraction and tourism text. |
| 6. Figure B2 is erroneous as it includes part of the Airedale Regeneration Priority Area within | | Figure B2 is diagrammatic, but will be amended to remedy the error. |

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| Craven District. | | |
| 7. Transport | Additional transport initiatives should be included in objective 5 in paragraph 2.22. | The objection is not appropriate to the Core Strategy as this paragraph concerns, and repeats the objectives of, the Regional Economic Strategy. |
| 8. National and regional planning policy has changed since the FED was published and these sections need updating. | | Agree. The Core Strategy will be updated to have regard to the National Planning Policy Framework and other relevant changes to planning policy that have occurred since publication. |
| 9. Evidence base | The Growth Assessment has not been published. | The Council's initial Growth Assessment was not published at this stage. Consultants have been commissioned to update this piece of work and the Growth Study will be published when the work has been completed. |
| | Further clarity is needed the impact of 2020 Vision and the Community Strategy over the whole of the plan period | The Local Strategy section will be updated to provide as much clarity as possible. |
| Vision | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Spatial Vision | General support for vision including sustainable development, role of city of Bradford and mention of LBIA | Noted |

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| | Should include standard policy from NPPF on presumption in favour of sustainable development | New policy P1 included which using the suggested model policy on NPPF presumption in favour of sustainable development. |
| | Clarification is required on use of vision and sub visions | Lower case text revised to provide clarity on role of different elements of the plan in particular role of vision, objectives and sub area visions. |
| | Amend para 6.63 with further details on role of Silsden | This section has now been removed as it is background to the preferred option. |
| 2. Built Heritage | 1. Support for the role of heritage in Spatial Vision | The comments of support are noted. |
| 3. Support for references to heritage and landscape in the supporting text | 1. Role of Saltaire, Haworth & City Centre | The comments of support are noted. |
| Objectives | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Objectives – General | 1. General support for objectives including mention of reuse of buildings, sustainable development, environmental protection and climate change. | Noted. |
| | 2. Need to link objectives to both vision and the policies. | Revised and updated Appendix 2 which sets out policy linkages and objectives. |

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| 2. Objective 2 | 1. Objective 2 should reflect need to use greenfield sites as part of mix in meeting housing needs. | Objective 2 revised to clarify focus on meeting needs with emphasis on use of deliverable brownfield sites. Revised policies HO2 and HO6 provide clarification in support of this objective and role of different elements of supply. |
| 3. Objective 12 - Built Heritage | 1. Support for Objective 12 relating to historic & natural environment | The comments of support are noted. |
| | 2. Role of historic and natural environment in supporting social and economic objectives (B6) | Wording of criterion B6 amended. |
| | 3. Support for the role of heritage environment (Para 3.70 & 3.76) | The comments of support are noted. |
| 4. Objective 15 | 1. Suggest amendment to objective 15 to support enhancement of biodiversity assets. | Objective 15 and 16 revised to reflect role of enhancement. |
| 5. Core Policy SC1 | 1. Policy should provide clarification as to the plan period and also clear indication of how much, where and when development will take place, and how it will be developed | Policy revised to reaffirm plan period to 2030. The purpose of the policy is to set out high level development strategy for all types of development not just housing. The thematic policies and sub area policies set out how SC1 will be delivered for different types of development. |
| | 2. Criterion (3) should make reference to retail | Criterion amended to make reference to retail. |
| | 3. Policy should support utilisation of the District's environment resources to deliver wider social and economic objectives. | Criterion 6 amended to recognise this point. |

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| | 4. Support the recognition of the role of the airport in generating economic growth in draft Policy SC1, which seeks to optimise the opportunities presented by the proximity of LBIA as an international business gateway. | Noted. |
| | 5. Suggest a need for a distinction between Access to LBIA and Manchester and need to ensure claw back and support for LBIA | Policy does not mention Manchester and as such the main focus is on the role of LBIA. |
| | 6. Additional development in Menston will but additional burdens on the road network | Noted. The role and scale of development in Menston and Wharfedale has been reduced in response to evidence updates including the HRA. The detailed impact of sites will be further tested through subsequent Development plan documents including mitigation measures |
| | 7. Need to include a policy to deliver objective 10 in relation to cultural assets and define social infrastructure | Cultural assets and social infrastructure are recognised in the sub area policies linked to the role and function of different settlements. |
| | 8. Explicit reference should be made in policy to housing provision. | Policy revised with explicit reference to meeting need for homes. |
| | 9. Lack of reference to role of quarries in supporting development needs as previously developed sites | Too detailed for the objectives. Covered by policy HO6 though it is not appropriate to provide an exhaustive list of types of previously developed land. |
| | 10. Object to scale of development in Bingley as a principal town given infrastructure | Principal towns category reflects both role and contribution to growth. Updates to infrastructure information but no significant |

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| | constraints | critical issues to warrant change to status. Infrastructure can be considered in more detail when allocating sites and consideration of mitigation measure can be explored where required. These may influence the timing of development under policy HO4. |
| | 11. The plan seeks to make over provision for housing in particular in Wharfedale where infrastructure such as transport is limited. | The role and scale of development in Ilkley and Wharfedale has been reduced in response to evidence updates including the HRA. The detailed impact of sites will be further tested through subsequent Development plan documents including mitigation measures |
| | 12. Needs greater reference to the City of Bradford urban area as well as the wider district and city centre. Also recognise role of other centres such as Baildon. | Policy amended to clarify role of City of Bradford and other settlements. In appropriate to list in this policy all settlements. This is covered in the more detailed topic and sub area policies. |
| 6. Core Policy SC2 – Climate Change and Resource Use | 1. General support for the policy | Comments of support noted. |
| | 2. Strengthen policy in relation to energy use and emissions | Amendment made to the policy. |
| | 3. More emphasis on long term environmental sustainability | Amendment made to the policy. |
| 7. Core Policy SC3 – Working together to make great places | 1. Supporting targets should quantify the level of sustainable transport to be achieved, and provide a definition of effective landscape and environmental management and | Performance framework for the plan have been comprehensively updated and rationalised. The focus has been on key plan indicators and which can be monitored within anticipated resources. This has had regard to the NPPF and relevant Regulations which set out |

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| | enhancement. | AMR requirements. |
| | 2. Regard must be had to proposals in Leeds and cumulative and cross boundary implications | The policy has been revised with an new part b which sets out the approach to the duty to cooperate and consideration of cross boundary issues. |
| | 3. Policy SC3 should be more explicit in how it has and proposes to co-operate with neighbouring authorities, partners. In particular how it will discharge the Duty to cooperate. | The policy has been revised with an new part b which sets out the approach to the duty to cooperate and consideration of cross boundary issues. |
| | 4. Bradford development needs should be delivered by other councils who support growth. | The NPPF makes clear that each LPA should meet its objectively assessed needs in first instance which is what the plan seeks to achieve. |
| | 5. Policy needs clarification on what is meant by water transport links | This is developed further as appropriate within the sub area policies and thematic policies in particular transport and movement and environment. |
| | 6. Delete criterion 9 as repeats criterion 6. | The focus of 6 is on climate change while 9 is more broad. |
| | 7. Support reference to use of sustainable modes of transport. | Noted. |
| 8. Core Policy SC4 – Hierarchy of Settlements | 1. Need to pick up theatres in parking standards | The parking standards have been revised and updated. |
| | 2. Outcomes, Indicators and Targets are amended to include measurable targets for | Performance framework for the plan have been comprehensively updated and rationalised. The focus has been on key plan indicators |

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| | green infrastructure provision as well as practical environmental indicators and targets to measure improvement and safeguard environmental values. | and which can be monitored within anticipated resources. This has had regard to the NPPF and relevant Regulations which set out AMR requirements. |
| | 3. Policy should be clear on how capacity studies have been used to inform plan-making processes and how environmental considerations have been or will be taken into account to steer development to less sensitive areas | The use of evidence to determine the scale and distribution of homes is set out in the Housing section. |
| | 4. Local growth centres not needed – rational for the choices. | The scale of objectively assessed need and land supply mean that the scale of development cannot be met solely within the City of Bradford and the Principal towns and there is a need for other settlements to take growth. |
| | 5. The primary objective of Policy SC4 should be to clearly set out the District's settlement hierarchy. It should then seek to specify how much development is intended to happen where, when and by what means it will be delivered. | The purpose of the policy is to set out high level settlement hierarchy for all types of development not just housing. The thematic policies and sub area policies set out how SC4 will be delivered for different types of development. |
| | 6. Sharpen links to SC5. Place shaping – relationship to sub areas and deliver. Tiers. | Comment noted. |
| | 7. Raise Addingham to a Local Growth centre | The role and scale of development in Addingham and Wharfedale has been reduced in response to evidence updates including the |

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| | | HRA. It would not be appropriate to raise Addingham to a Local Growth centre |
| | 8. Concerns over scale of development linked to Silsden local growth centre. | The role, distribution and scale of development has been revised in light of updated evidence including the HRA. While still a growth centre silsden has a reduced scale of development. Policy updated to provide clarity on role of different levels of the hierarchy. |
| | 9. Need to ensure sustainable growth of silsden including retail links to retail and centres policy | See comment to sub issue number 8 above. |
| | 10. Policy should be more explicit in identifying the uses that would contribute towards sustainable growth of these centres such as Silsden. | See comment to sub issue number 8 above. |
| | 11. Menston should not be included as a local growth centre as does not need more housing and | Noted. The role and scale of development in Menston and Wharfedale has been reduced in response to evidence updates including the HRA. The detailed impact of sites will be further tested through subsequent Development plan documents including mitigation measures |
| | 12. Support creation of new biodiversity and green space assets but need to be clearer how this is to be achieved. | Noted. Additional text added on biodiversity in context of South Pennine moors. |
| | 13. Amend policy to reflect need to protect | Policy updated to reflect need to protect character. This is also |

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| | distinctive character of principle towns and local growth centres | supported by several new policies on design. |
| | 14. Support the position of Addingham in the settlement hierarchy and the scale of development proposed. | Noted. |
| | 15. Support for policy and recognition of need for growth in Wharfedale | Noted. |
| | 16. Support focus of development and role of city of Bradford within hierarchy | Noted. |
| | 17. Support for identification of local growth centres in particular Queensbury | Noted |
| | 18. Support settlement hierarchy in particular the wider distribution and role fo Bingley. | Noted |
| | 19. General support for policy in particular recognition of Silsden as a local growth centre. | Noted |
| | 20. Needs to recognise evening economy including theatres | Criterion b (4) amended to reflect. |
| | 21. Recommend addition to recognise importance to principal towns of ensuring housing provision. | Policy already recognises role of principal towns in meeting housing needs. |
| | 22. There is a disproportionate amount of | Housing section sets out the revised approach to housing |

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| | housing being delivered in Regional City of Bradford. Suggest a more equitable distribution of housing supply which does not necessitate large green belt releases such as Holme Wood. | distribution and exceptional circumstances which require use of green belt to meet supply of homes. The HRA work has meant an increased need to focus development into the City of Bradford. |
| | 23. Policy is supported in principal but should be amend to help clarity and relationship with other policies in particular sub area policies. | Policy has been revised to improve clarity and linkages to other key policy areas. |
| | 24. Support hierarchy but suggest Needs to refer to the contribution that Baildon as a whole can make to the District in terms of development opportunities not just lower Baildon | Further detail on role of Baildon is provided in the revised housing section and sub area policies. |
| 9. Core Policy SC5 - Location of Development | 1. Given policy SC4 and Policy HO3As such these factors will largely control the distribution and rate of delivery. No need for SC5 and HO4 – limits supply and housing delivery | This policy provides the approach for all types of development not just housing. |
| | 2. Other than brownfiled land there are other policy issues that need to be taken into consideration when determining the location of sites to be allocated for development, including the PPS25 Sequential Test. | This is recognised and set out in other policies which need to be read together. The housing section sets out the considerations including flood risk in determining the headline scale and distribution. Further more detailed consideration will take place using the Core Strategy policies in the later site allocating DPDs. |
| | 3. Support references to strategic road | Noted |

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| | network and need for improvements and making best use of capacity. | |
| | 4. All brownfield land should be used before any green fields area released | This would be contrary to NPPF. The plan has to ensure deliverable supply of land including a supply of deliverable 5 years supply in first 5 years of plan. The plan seeks to maximise use of brownfield land but recognises need for green field to ensure it meets development requirements in line with NPPF. |
| | 5. Supports the hierarchy of previously developed land, infill sites and extensions to settlements in suitable locations. | Noted. |
| | 6. Policy should recognise the role and importance of urban greenspace and the impact its loss can have on amenity and communities. | Noted. This policy should be read with the revised policies in the Housing section which set out more detailed considerations and principal for selection of sites. |
| | 7. Support for policy but note plan will need to consider green belt releases as part of approach as not all brownfield sites are deliverable. Clarification is sought on the sequential approach and flexibility allowed for in relation to brownfield which does not preclude green field site from release. | Policy revised to include role of Green belt land and Greenfield land. |
| | 8. Add reference in criterion 1 to quarries | Not appropriate to this policy. Covered by policy HO6 though it is not |

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| | | appropriate to provide an exhaustive list of types of previously developed land. |
| | 9. Object to the control of development under the policy and limitations this will place on supply and delivery. Policy should allow for more flexibility. | It is appropriate and in line with NPPF to set out the approach to identifying land for development. The approach will not negate the need to ensure the plan meets its needs and allocates a supply of deliverable sites. Revisions to the policy make this clear. |
| 10. Core Policy SC6 – Green Infrastructure | 1. General support for the policy | Comments of support noted. |
| | 2. Concern about achieving outcomes in relation to green infrastructure and wish to see implementation strengthened. | Some areas are covered by the contents of other policies within the plan and amendments to Policy SC6. |
| 11. Core Policy SC7 Green Belt | 1. Timescales for a Green Belt review need to be set out clearly within the Core Strategy safeguarded land The revised Green Belt boundary will provide long term protection for at least 15 years from adoption of the Core Strategy, whilst allowing for sufficient housing land supply, adequately providing for housing land requirements for the plan period. | The selective review will take place through the preparation of the Allocations DPD. The policy commits to ensuring a green belt beyond the plan period. |
| | 2. Green belt review ought to examine the following as a minimum: <ul style="list-style-type: none"> Assessing the physical constraints to sustainable development in the green | Policy revised to reinforce the functions of green belt as set out in NPPF. Thematic sections and sub area policies set out the local circumstances and role of environment and landscape. |

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| | <p>belt, including, crucially, consideration of the environmental capacity of the area, taking account pressures such as climate change and water supply;</p> <ul style="list-style-type: none"> • Assessing the quality, comprising landscape and biodiversity quality, and accessibility of green belt land; • Identification of long term defensible boundaries to the green belt; • Assessment of opportunities to enhance the green belt to deliver maximum benefits to people and wildlife together. | <p>The Growth study considered the strategic function of green belt and sustainability of settlements across the district.</p> <p>The review would be selective and would not revisit all boundaries.</p> |
| | 3. CS should not specify how much green belt and where | |
| | 4. Our client therefore requests that Policy SC7 includes text which prioritises green belt release in the most sustainable locations of the relevant settlement and that this includes proximity to public transport and local services within the settlement. | NPPF makes clear Green belt should be used as last resort under exceptional circumstances. |
| | 5. Support for need to release green belt but need to ensure releases in most sustainable locations. | Noted. |

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| | 6. No exceptional circumstances to amend green belt to meet development needs. Propose deletion of criterion B. | Updated housing requirement and SHLAA indicate the objectively assessed need cannot be fully met without release of green belt land. The NPPF makes clear the Local Plan is the correct place to consider changes and exceptional circumstances. |
| | 7. The policy should reflect need for a full review of the green belt which is required to meet the housing needs within the plan period. | The exceptional circumstances for changing green belt are limited to housing and employment and are thus selective. It is not appropriate at this point to undertake a comprehensive detailed review of the entire green belt boundary. |
| | 8. Support part B and need for localised reviews | Noted. |
| | 9. Green belt Land should only be considered for use as a last resort and only when all other land has been allocated. Object to the need to remove land from green belt particularly in Wharfedale. | This would be contrary to NPPF. The plan has to ensure deliverable supply of land including a supply of deliverable 5 years supply in first 5 years of plan. The plan seeks to maximise use of brownfield land but recognises need for green field to ensure it meets development requirements in line with NPPF. Updated housing requirement and SHLAA indicate the objectively assessed need cannot be fully met without release of green belt land. The NPPF makes clear the Local Plan is the correct place to consider changes and exceptional circumstances. |
| | 10. The Policy should be amended to properly reflect the function of green belt in particular the need to prevent coalescence of settlements. | Policy revised to reinforce the functions of green belt and consideration in particular in amending the green belt to meet the development need looks closely at coalescence. |

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| | <p>11. No reference to environmental or sustainability issues and how these are to be addressed in the policy. the policy be revised to reflect to recognise the importance of green belt land to landscape and biodiversity quality.</p> | <p>Policy revised to reinforce the functions of green belt as set out in NPPF.</p> |
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SECTION 4 – SUB AREAS

Policy BD1 - City of Bradford including Shipley and Lower Baildon Sub Area &

Policy BD2 – Investment Priorities for the City of Bradford including Shipley and Lower Baildon

Comments received relating to the City of Bradford including areas of Shipley and Lower Baildon or settlements within this area have been addressed under the topic area to which the issue related i.e. transport, housing, environment etc to avoid duplication of issues. Issues relating to specific sites or smaller areas will be addressed during the Allocations Development Plan Document (DPD) preparation in due course.

Policy AD1 – Airedale Sub Area &

Policy AD2 – Investment Priorities for the Airedale Sub Area

Comments received relating to the Airedale sub-area or settlements within this area have been addressed under the topic area to which the issue related i.e. transport, housing, environment etc to avoid duplication of issues. Issues relating to specific sites or smaller areas will be addressed during the Allocations Development Plan Document (DPD) preparation in due course.

Policy WD1 – Wharfedale Sub Area &

Policy WD2 - Investment Priorities for the Wharfedale Sub Area

Comments received relating to the Wharfedale sub-area or settlements within this area have been addressed under the topic area to which the issue

related i.e. transport, housing, environment etc to avoid duplication of issues. Issues relating to specific sites or smaller areas will be addressed during the Allocations Development Plan Document (DPD) preparation in due course.

Policy PN1 – South Pennine Towns and Villages Sub Area &

Policy PN2 - Investment Priorities for the South Pennine Towns and Villages Sub Area

Comments received relating to the South Pennine Towns and Villages sub-area or settlements within this area have been addressed under the topic area to which the issue related i.e. transport, housing, environment etc to avoid duplication of issues. Issues relating to specific sites or smaller areas will be addressed during the Allocations Development Plan Document (DPD) preparation in due course.

SECTION 5: PLANNING FOR PROSPERITY: ECONOMY & JOBS

Policy EC1 – Creating a successful and competitive Bradford District economy within

| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
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| 1. Relating business to the Districts environmental assets | | This is not appropriate in this instance as the potential for tourism is included within Criterion 'J' of the policy. |
| 2. Creating a successful Bradford District Economy | | The evidence contained in the Employment Land Review assesses the economic structure of all parts of the District. No policy change proposed. |
| 3. Conflict between Policy EC1 and Sub Area Policy BD1 | | There is no conflict in Policy terms. Key area based proposals will be set out within the Allocations DPD rather than at strategic level. No change to policy proposed. |
| 4. Convenience goods retailing | Increase the amount of convenience goods retailing across the city | The Retail & Leisure Study (2013) recognises the need for further convenience goods retailing in the Bradford District. Policy EC5 |

| | | (informed by the Retail & Leisure Study, 2013) has proposed a network and hierarchy of retail centre's which will be a focus for new convenience goods retailing. |
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| 5. A 'high quality environment' is a key requirement of attracting inward investment into the district | | Agree. Policy to be amended to read: "knowledge based industries by creating an attractive, high quality environment across the District and by providing..." (Paragraph 5.1.1, Line 11) |
| Policy EC2 – supporting Business and Job Creation | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Additional employment land and economic development will increase pressure on the local infrastructure | Potential jobs growth will put pressure on the highway network | The District has a priority for jobs creation. Imposed planning conditions and green travel plans could help mitigate congestion problems. No change to policy. |
| 2. The estimated jobs requirement is overestimated | | Whilst the Regional Econometric Model (REM) estimates the future jobs growth over the life of the Plan, the actual jobs need across the District is potentially much higher based on figures provided by Department for Work & Pensions (DWP) where 15% of 16-64 year olds were claiming out of work benefits. No change to policy. |
| 3. The allocation and protection of employment sites should be flexible enough to allow their consideration for alternative uses | Wording is too restrictive, lacking the flexibility to enable allocated employment sites to be developed for alternative uses, where it can be demonstrated that the land is unsuitable for employment purposes | Employment sites will be assessed as to their suitability for employment purposes and allocated in the Allocations DPD. They will also be monitored on a regular basis as to the contribution they will make to the Districts economic strategy. The Policy therefore gives certainty and clarity as to the future development of the site |

| 4. Uses on allocated employment sites should be more flexible to include non B class uses | Allow town centre uses on all employment sites | Employment sites will be assessed as to their suitability for employment purposes and allocated in the Allocations DPD. They will also be monitored on a regular basis as to the contribution they will make to the Districts economic strategy. The sites will be identified for the B Class uses with the exception of offices, to stimulate inward investment. Their importance should not be compromised by the use of the site for small retail and other developments. Large scale retail and leisure proposals are uses which should be restricted to centres. |
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| Policy EC3 – Employment Land Requirement | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Increased Employment Land in South Bradford will have a detrimental effect on highway infrastructure | | The Core Strategy proposes to allocate 105 hectares of employment land within the whole Bradford area, including Shipley and Lower Baildon. As part of this strategy South Bradford is identified as only one of the locations for new employment opportunities and will accommodate only a proportion of the 105 hectares. South Bradford is the preferred area where investors and jobs providers wish to locate their operations. The Plan responds to this trend as a means of encouraging economic regeneration of the city. The specific sites will be identified at Allocations stage. There are consequently no alterations to policy in this respect |
| 2. Loss of Green Belt | Green belt releases for new employment sites | Paragraph 82 of NPPF states that new green belts should only be established in exceptional circumstances, for example when |

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| | | planning for large scale development such as new settlements or major urban extensions. The proposed releases are for urban extensions to provide strategic employment sites. In these circumstances the exception is appropriate. |
| 3. Employment land requirement too low | 1. Wharfedale employment land requirement | 1. The detailed allocation of employment land in the Wharfedale settlements will be defined within the Allocations DPD. No change is proposed to the policy in this respect. |
| | | 2. The objector has not provided any evidence on what the optimum level of employment land should be provided in Ilkley. Based on past trends, there is unlikely to be a greater demand for employment land from economic investors. The policy remains unchanged in this respect |
| | 2. Employment land supply in smaller settlements | There are no proposals to partner Thornton with Haworth. The Core Strategy includes a target of 31 hectares of employment land in the Airedale corridor in the broader sense. At the allocations stage, possible small allocations of employment land may be identified in the smaller settlements within the Pennine fringe as part of the wider corridor area. No change is therefore proposed to the policy in this respect |
| | 3. Employment Land supply in Airedale | The Core strategy proposes a total of 31 hectares of employment land within Airedale and the potential offer that Silsden can provide will be assessed at allocations stage. No change is proposed to the policy. |
| | 4. Employment land supply in Wharfedale | The detailed allocation of employment land in the Wharfedale |

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| | | settlements will be defined within the Allocations DPD. No change is proposed to the policy in this respect. |
| 4. Poor infrastructure will inhibit economic development | Employment land allocation in Wharfedale | The Core Strategy proposes to accommodate 10 hectares of employment land within the wider Wharfedale context and not just in Ilkley. However, Ilkley is identified as a Principal Town and a centre for future growth with new employment opportunities for an increasing number of local residents. There is no change proposed for this policy. |
| 5. Green belt release at Holme Wood for employment purposes | | South Bradford is the prime area for inward investment for potential jobs growth. A specific site will be addressed in the Allocations DPD |
| 6. Employment Land Requirement | Mineral extraction | The importance of the mineral extraction industry is recognised in Paragraph 5.3.161 where it is consistent with the economic threads of Spatial Objective 6. No change is proposed to policy. |
| 7. Source for new employment opportunities | Employment land allocations should not merely be carried over from previous development plans | Employment land will not be simply carried over from previous Plans. Each site will be assessed as to their sustainability and their planning and economic merits. They will also be considered in terms of meeting the requirements of current investors and the commercial property development industry. Specific sites will be identified at allocations stage. No change proposed to this Policy. |
| 8. Priority for allocation of employment sites should be given to RUDP sites | | Sites will be allocated on a range of factors such as sustainability, location, market suitability etc. The suggested priority is restrictive. |

Policy EC4 – Sustainable Economic Growth

| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
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| 1. Sustainable Economic Growth | Sustainable travel to work mechanisms | EC4 a makes reference to sustainable development which includes sustainable travel. This avoids repetition of aspects of sustainability across all the policy areas. No change is proposed to the policy. |
| 2. Enhancing town centres | Sports facilities in centres | Policy EC5 has been revised at EC5.A and EC5.B to encourage sports and recreation uses in city and town centres. |
| 3. Employment Zones too restrictive | | Employment zones will comprise strategic centres of employment, to encourage inward economic investment, industrial clusters and linkages. Their allocation will also protect against the erosion of large centres of business and industry to other non commercial uses such as housing and recreation and such uses. Whilst economic growth and employment covers a large array of sectors, certain developments such as retail, offices, leisure, health or education have more appropriate and specific locations. |
| 4. Provision of levels of new Employment land unsustainable in certain locations | Wharfedale allocation of employment land | The need for additional development land has been established in the 'Background and Context' chapter and in the Employment land Review as part of the evidence base. Mitigation measures such as green transport plans will be encouraged to help relieve congestion problems. No change to policy. |
| 5. Provision of employment land in Airedale | Silsden employment land requirement underestimated | Whilst existing allocated RUDP sites may provide for some of the future employment needs in Silsden, a more detailed analysis of need within the settlement will be carried out as part of the |

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| | | Allocations DPD. Potential new employment sites will be assessed as to their sustainability, their suitability for employment purposes and in terms of market demand. No change to policy. |
| 6. Method of protecting employment sites should be more consistent with NPPF | Additional considerations for the development of established employment sites for alternative uses | The additional wording would reduce the importance to the economic strategy of the plan, of retaining existing employment sites. It would burden the explicit objectives of the policy, of securing investment and providing jobs, where clarity of message is important. The need for other uses within a local area, as defined by the core strategy, will be addressed at allocations stage rather than through development management. |
| 7. Measuring economic growth and development in environmental terms | Infrastructure deficiencies | A sustainability assessment of the overall policy has already been undertaken in the broader sense. Any allocations that result from this policy will be subject to sustainability appraisals at a later stage. No further targets will be added to the broad policy area at this stage. The wording of the policy will include the suggested replacement reference to sustainable development. |
| Policy EC5 – City, Town, District & Local Centres | | |
| SUMMARY OF MAIN ISSUE RAISED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. The evening economy should be recognised as an important contributor to the local economy | Theatre use | Reference to theatres is already included within sections A and B of the Policy and consequently a further repetition is unnecessary. |
| 2. Old mills and commercial buildings should not be subject to | | Applying the suggested non restrictive use policy to mill buildings etc would potentially permit a range of uses which may be inappropriate |

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| development management principles | | in environmentally and socially sensitive areas. It would undermine one of the principles of planning which is to guide development to the most appropriate and sustainable locations. Detailed policy on specific buildings could be dealt with as part of the Allocations DPD rather than as a strategic policy issue. No change to policy. |
| 3. Bradford City Centre | Expansion of the city centre | Evidence base incorporating the proposed Retail Study and City Centre Area Action Plan work will provide an analysis of these issues. |
| 4. Health care and education provision should be encouraged in centres | Criteria A of policy EC5 | Agree, policy revised, see Policy EC5 (K). "Healthcare services and educational facilities at ground and upper floor levels within above centres will be encouraged, provided they do not impact on the retail function of the primary shopping area". Reference is already made to the health care and education sector in the 'Business Clusters' section in paragraph 5.1.47 |
| 5. Policy EC(5), District and town centres | Poor infrastructure will inhibit economic development | At the allocations stage, whilst economic development will still be focused in centres, appropriate sites will be allocated in sustainable locations to foster inward investment and economic growth. Infrastructure and sustainable travel factors will form part of this process in order to mitigate congestion problems. The wider aspects of the transport infrastructure are contained within the Transport Policy section and it is not appropriate to repeat the details under the Economic Policies. No change is therefore proposed to the Policy |
| 6. District centres | 1. Object to the deletion of Buttershaw as a | The Retail & Leisure Study (2013) confirms that Buttershaw local |

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| | District Centre | centre does not function as a local centre but a stand alone supermarket and therefore should be excluded as a designated centre. No change is proposed to policy EC5. |
| | 2. Object to the deletion of Mayo Avenue as a District Centre | The Retail & Leisure Study (2013) confirms that Mayo Avenue does not function as a District Centre and has very limited scope to expand to function as a District Centre in the future. No change is proposed to policy EC5. |
| | 3. Objects to the allocation of a new District Centre at Odsal | Policy revised by elevating status of Bankfoot Local Centre to District Centre and renamed in Network and Hierarchy of Centres to Odsal District Centre. Retail & Leisure Study (2013) recommends the creation of a new district centre in South Bradford by elevating the status of Bankfoot local centre to District Centre (renamed Odsal District Centre). |
| 7. Local Centres | Object to Local Centre designation at Sandy Lane | The Retail & Leisure Study (2013) confirms that Sandy Lane does not function as a Local Centre. Policy EC5 has been revised. Sandy Lane is therefore de-listed as a local centre in the revised EC5. |
| 8. Hot food takeaways should only be located in centres | | This comment is considered to be inappropriate. Such a policy would be contradictory to guidance in NPPF. |

SECTION 5: PLANNING FOR PROSPERITY: TRANSPORT & MOVEMENT

| Policy TR1 –Travel Reduction and Modal Shift | | |
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| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL’S RESPONSE |
| 1. Accessibility | 1. Work in collaboration to improve links along A658 corridor | Agreed and noted. |
| 2. Aspiration for commuter service | 1. KWVR believe aspiration not possible and reference needs removing | The possibility of providing commuter services on the KWVR needs further exploration with Metro – current view is that Worth Valley is better served by bus |
| 3. M62 Motorway | 1. Impact of Holme Wood Expansion | The Council will work with Highways Agency to test impact on strategic road network |
| 4. Strategic Road Network | 1. Will it be able to cater for development-generated demand | The Council will work with Highways Agency to test impact on strategic road network |
| | 2. Impact on out commuting from Bradford | The Council will work with Highways Agency to test impact on strategic road network |
| 5. Public transport capacity | 1. 10 hectares of employment land will increase long distance commuters conflicting with TR1 | A mixture of employment and housing will improve the sustainability of the local community |
| 6. Congestion | 1. Further developments would place pressure on road network between Ilkley and Addingham | The Council is committed to consider and implement future enhancement schemes to ease capacity and congestion problems on all roads in the district |
| 7. Access | 1. IL/015 & IL/019 access is poor and would | Site specific issues to be dealt with by Allocations DPD and or site |

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| | not accord with reduction policies | planning application |
| 8. Travel reduction | 1. Support development that maximises potential for modal shift | Comment noted |
| 9. Travel reduction and modal shift | 1. PTALs could be used to assess accessibility to public transport | Done |
| | 2. Use of PTALs is an objective of LTP3 | Done |
| | 3. Metro supports travel plans but only if there are enforceable targets | Noted. |
| 10. Modal shift | 1. Support development and improvements of towpaths | Noted |
| | 2. Increase use of towpath will increase maintenance liability therefore recognition of this is important | Noted |
| | 3. British Waterways should be added to lead role section for towpaths | Noted |
| | 4. No strategy exists for modal shift to buses | Policy TR1 and Local Transport Plan address modal shift |
| | 5. Intention to change journeys from car to cycle supported but this need is now rather than after increases | A significant number of initiatives being put in place to encourage cycling |
| | 6. Support reduction of travel demand, traffic growth & congestion | Noted |

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| | 7. Support shift to modes of lower impact | Noted |
| | 8. Support move to improve journey time | Noted |
| 11. Access to stations | 1. Lack of daytime parking deterring off peak travel and modal shift | A review of station parking and access is required |
| 12. Public transport and modal shift | 1. Withdrawing bus services between Bradford and Denholme will increase car use | Noted |
| 13. Public transport | 1. Supports better public transport avoiding use of car | Noted |
| 14. Connectivity | 1. Supports the encouragement of commuter service on Worth Valley Railway as alternative to car | Noted – reference amended. |
| 15. Public transport, walking and cycling | 1. Concerned that growth is not directed to sustainable locations near sustainable routes encouraging modal shift | Accessibility standards will inform site locations |
| | 2. Need for growth near local settlement not outside so as to encourage walking and public transport use not car use | |

| Policy TR2 – Parking Policy | | |
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| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL’S RESPONSE |
| 1. Access to stations | 1. Lack of daytime parking deterring off peak travel and modal shift | Detailed site issue – to be considered in allocations DPD |
| | 2. Station car park at capacity | Detailed site issue – to be considered in allocations DPD |
| 2.. On street parking | 1. Destroy shopping and discourage travel to Ilkley | Car Parking provision subject to periodic review |
| 3. Car parking | 1. Policy does cover theatres | Policy applying to Cinemas etc will incorporate theatres |
| | 2. Shortage in Ilkley | Car Parking provision subject to periodic review |
| | 3. Parking infrastructure needs repairing and up dating | Car Parking provision subject to periodic review |
| | 4. Need for a multi storey | Car Parking provision subject to periodic review |
| | 5. Need extra provision at recreational field | Car Parking provision subject to periodic review |
| | 6. Appear very lenient, should accord with other authorities | Parking standards are generally in alignment with adjacent Districts where appropriate |
| | 7. Concerned standards do not represent maximum standards | Parking standards are generally in alignment with adjacent Districts where appropriate |
| | 8. Would like to see more stringent standards for city centre | Parking standards are generally in alignment with adjacent Districts where appropriate |

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| | 9. Much more about parking in response | Parking standards are generally in alignment with adjacent Districts where appropriate |
| | 10. Problem of day long commuters to Leeds and Bradford | Car Parking provision subject to periodic review |
| | 11. Problem might be eased by park and ride facility | Review opportunities for Park and Ride |
| | 12. No adequate parking at Silsden or Ilkley train stations for increase in commuters | Car Parking provision subject to periodic review |
| | 13. Increase in population of Addingham would place strain on on-street parking in Ilkley | Car Parking provision subject to periodic review |
| | 14. Park and ride scheme adjacent to Ben Rhydding station | Review opportunities for Park and Ride |
| | 15. Obvious site for park and ride taken by IL/009 | Review opportunities for Park and Ride, Car Parking provision subject to periodic review |
| | 16. Obvious site for parking in Ilkley taken by Tesco store | This issue cannot be resolved by LDF Core Strategy |
| | 17. Additional housing will cause increase in parking around school | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 18. Park & ride must have bus priority to ensure journey time saving | Noted |

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| | 19. Revenue implications of park & ride need to be discussed with Metro | Noted |
| | 20. Long stay rail parking supported | Noted |
| | 21. Impact on rail service needs to be considered | Noted |
| | 22.. Introduction of various car parking schemes could have impact on vitality & viability of commercial & economic development especially retail | Noted - Policy TR1 and TR2 have been reviewed and car parking provision and charges will be continually monitored |
| | 23. Station car park is over crowded and local road suffering from commuter parking | Examine feasibility of station parking improvements |
| | 24. Problem in Silsden, limited parking, on street parking on Main Street to sustain business and slow traffic | Car Parking provision subject to periodic review |
| | 25. Silsden and Steeton rail station especially long term. Increase in commuters will aggravate this | Car Parking provision subject to periodic review |
| | 26. Parked cars in Addingham and Ilkley already a problem and further development only increasing this | A review traffic / public transport conditions in Addingham / Ilkley to be undertaken at an appropriate stage |
| | 27. Commuters travelling to Ilkley and Steeton to make use of discounted fares/ Park and | Car Parking provision subject to periodic review |

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| | ride necessary | |
| | 28. Necessary for a park and ride scheme for commuters possibly off Addingham bypass | Car Parking provision subject to periodic review |
| | 29. Oppose policies in favour of increased parking & out of town developments | Noted |
| | 30. Railway car park unable to cope. Need multi-storey or underground | Car Parking provision subject to periodic review |
| | 31. Review of unrestricted parking needed | Car Parking provision subject to periodic review |
| | 32. Look at 1-2 hour restriction on Wells Road & Parade | Car Parking provision subject to periodic review |
| | 33. Issues in Burley and all rail stations in Wharfedale | Car Parking provision subject to periodic review |
| | 34. Improvements needed in Wharfedale | Car Parking provision subject to periodic review |
| | 35. Serious issues in village and at train station | Car Parking provision subject to periodic review |
| | 36. Parking around Grange is not now accessible and no alternative | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 37. Limited parking areas and constricted Main Street | Car Parking provision subject to periodic review |
| | 38. Ilkley. Especially long term and will | Car Parking provision subject to periodic review |

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| | increase with more commuter traffic | |
| 4. Transport for Leeds Study | 1. Conclusions of this study on demand management are relevant and need incorporating into LDF | Noted - the Council will be working with Leeds to assess impacts through the Duty to Co-operate approach |
| 5. Park & Ride | 1. Needed at Ben Rhydding | Review opportunities for Park and Ride |
| | 2. Difficult to operate due to commuters from Otley, Guisley, Tranmere Park, Hawkesworth, Burley. | Examine feasibility of station parking improvements |
| | 3. Professional employment might need uneconomic opening hours | Examine feasibility of station parking improvements |
| | 4. Ilkley is clearly a location for a Park & Ride | Noted |
| Policy TR3 – Public Transport, Cycling and Walking | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Accessibility | 1. Distinction between LBIA and Manchester | The impact of LBIA on economic growth in Bradford & WY is recognised and the Council is stressing this in the work currently being undertaken by WY partners on the WYTF project. However improving rail links to Manchester Airport is also seen as critical to the improved economic performance of the District and this still needs to feature strongly in the LDF |
| | 2. Improved public transport | Agreed and noted |

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| | 3. Further growth of public transport services | Agreed and noted. |
| 2. Public Transport | 1. Assumption that people will use even if quantity and quality increase | Improvements being made through Quality Contracts / Quality Partnerships will lead to an enhanced bus offer which should help to stem the decline in bus patronage. Rail patronage has grown significantly in recent years and, where capacity exists, this should continue |
| | 2. Agency would support initiatives especially light rapid transit | LRT identified as potential for access to Leeds Bradford International Airport. Future developments could include extension of LRT where feasible |
| | 3. Reference to protecting routes not referenced in supporting documents | Reference to protecting routes included in TR5. Specific lines of transport infrastructure yet to be identified |
| | 4. More detail is needed to establish benefit | Needs review |
| | 5. Metro plans do not take account of increases in Wharfedale | Metro will review consequences of increased passengers in Wharfedale |
| | 6. It's easier to commute from Ilkely to Leeds than Ilkley to Keighley benefitting Leeds not Bradford | Noted |
| | 7. Support interchange threat to reduce service of 78A will increase car travel | Review opportunities for improved Public Transport systems with Metro and include proposals in Local Infrastructure Plan |
| | 8. Commitment needed by all agencies to prevent congestion making interchange inaccessible | Review opportunities for improved Public Transport systems with Metro and include proposals in Local Infrastructure Plan |

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| | 9. Concerned that higher density housing is suggested where there is good P.T. | Accessibility standards will inform site locations |
| | 10. Public transport is one of many determining facts for consideration of housing density | Accessibility standards will inform site locations |
| | 11. Needs to be increased before development | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 12. Baildon station is not staffed and has no CCTV security | Public transport improvements will be considered as part of LTP Railplan 7 |
| | 13. Metro welcome using accessibility assessments for DPD. But would like further discussion | Further discussions are ongoing |
| | 14. Priorities in C1 need rewording to be outcome based opposed to scheme based | Noted. Policies rewritten |
| | 15. Supports promotion of park and ride but request to be fully involved | Noted |
| | 16. Policy C3 needs to be reworded to be closely aligned with LTP3 hubs strategy | Noted |
| | 17. Section D needs to align with LTP3 rail plan | Noted |
| | 18. Metro support policy section E | Noted |

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| | 19. Excellent rail services only exist to major cities not to Harrogate, Skipton or beyond | Reference not in transport policies |
| | 20. Bus services in wharfe valley have reduced since 2005 | Noted |
| | 21. Bus services from Ilkley to Bradford only operate during weekday evenings | Noted |
| | 22. Bus services to Skipton are limited | Noted |
| | 23. No bus lanes exist in Wharfe Valley | Noted |
| | 24. Apperley Bridge has just an hourly service linking to Bradford and Airport | CBDMC working with Metro and Airport to improve services to Airport in alignment with Airport expansion |
| | 25. New railway station at Apperley Bridge positive | Noted |
| | 26. Strategy should look at increasing access to stations by bus, cycle and improving car parking | Implied in the policies |
| | 27. Leeds announced bus lanes to Horsforth but recognise options exist for extending routes to Yeadon, Guisley, & Lower Wharfedale | Noted |
| | 28. Service is poor and unreliable | Bus Quality Contracts / Partnership being developed to improve public transport operations |

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| | 29. Links are poor with one service under threat. Adding more reliance on the car | Noted |
| | 30. If public trans. Remains poor reasonable to assume roads will struggle with extra traffic | Noted |
| | 31. Overcrowding a daily occurrence especially on trains | LTP Railplan 7 will help to address growth issues |
| | 32. Needs a review of bus and train times for better coordination | Noted |
| | 33. Only bus links with Bradford in the evening | Noted |
| | 34. Current economic climate makes significant improvements impossible | Noted |
| | 35. Investment in Laisterdyke station, rapid transit route to be aspirational | New stations removed from the Plan except those that are already in process of being delivered |
| | 36. Supports better public transport avoiding use of car | Noted |
| | 37. Without bus lanes and services it is likely that car drivers will dominate new train service at Apperley Bridge | Bus priority measures are implemented where feasible and benefits can be demonstrated |
| 3. Rail service capacity | 1. New stations will increase demand | Trains serving new stations at Apperly Bridge and Kirkstall in peaks would be Leeds/Bradford trains where there is spare capacity therefore limited impact on Airedale and Wharfedale capacity |

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| | 2. Need for extra carriages | The rail service to Leeds is operating at or near to capacity at peak times, though there is spare capacity on services to Bradford. Increasing rolling stock would require increased capacity at Leeds Station (already being considered but costly). Alternative of lengthening trains but this would require platform lengthening at a number of stations – including those on the Airedale Line if the current efficient operating pattern is maintained |
| | 3. Wharfedale line already at capacity | The rail service to Leeds is operating at or near to capacity at peak times, though there is spare capacity on services to Bradford. Increasing rolling stock would require increased capacity at Leeds Station (already being considered but costly). Alternative of lengthening trains but this would require platform lengthening at a number of stations – including those on the Airedale Line if the current efficient operating pattern is maintained. |
| | 4. Services at capacity with lack of funding for new infrastructure | LTP Railplan 7 will address rail capacity issues as appropriate |
| | 5. Need to increase capacity between Leeds and Wharfedale | LTP Railplan 7 will help to address growth issues |
| | 6. Core strategy says line already at capacity | LTP Railplan 7 will help to address growth issues |
| 4. Rail infrastructure | 1. Recognition that rail has long lead time and big changes are outside control of LPA and Metro | Noted |
| | 2. High cost of rail is a major problem for | Noted |

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| | development around rail stations | |
| | 3. Community Infrastructure Levy to pool developer contributions would help deliver rail enhancements | Noted |
| | 4. With increase of 3100 houses the rail system moving forward will not be able to cope with increase in commuters even with the expected increase is outside the speculative proposals for the line. | LTP Railplan 7 will help to address growth issues |
| 5. Rail stations | 1. Concerns of number of rail stations in section D3 and needs to be amended | Provision of new rail stations has been updated with latest information |
| | 2. Platforms not long enough for new length trains | LTP Railplan 7 will address rail capacity issues as appropriate |
| | 3. Lack of daytime parking deterring off peak travel and modal shift | A review of station parking and access is required |
| 6. Beechcliffe Rail Station | 1. KTC question the need and surprised as Metro are surprised by proposal and the cost seems huge investment which may not be required | New stations removed from the Plan except those that are already in process of being delivered |
| 7. New rail station | 1. New station must cover all cost from generated income including long term maintenance before DfT will specify as stop in | New stations removed from the Plan except those that are already in process of being delivered |

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| | a franchise | |
| | 2. New stations need to be carefully managed partic. In terms of capacity | New stations removed from the Plan except those that are already in process of being delivered |
| 8. Community rail service | 1. From Keighley along K&WVR with Park & Ride at local stations | Noted – ongoing considerations |
| 9. Rail transport links | 1. Rail links are overloaded | LTP Railplan 7 will help to address growth issues |
| | 2. Improve links between rail stations and LBIA | Agreed and noted |
| 10. Road safety | 1. A65 will become more dangerous | A65 – model/review in partnership with Leeds |
| | 2. Pedestrians should not be inconvenienced by traffic and vice versa | Provision of pedestrian and cycling facilities will be designed to current standards |
| | 3. Addition housing causing additional safety problems around school | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| 11. Walking, cycling and rights of way | 1. Need for bridge across River Wharfe at Lether Bank | Improvements to infrastructure will be made where required and feasible |
| | 2. Supports improvements | Noted |
| | 3. Specific reference to towing paths in LDF | Policy amended |
| | 4. Priority should be given to developments that travel by foot/bicycle reducing reliance on car travel | Noted |

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| | 5. Need for improvement before new developments | A significant number of initiatives being put in place to encourage cycling |
| 12. Walking | 1. Increase in population will increase walking on the moor | Noted |
| | 2. Request the Core Strategy directs growth to areas where access by walking to services is easy | Noted |
| | 3. Local footpaths can be used as safe routes | Noted |
| | 4. Explain how walkable neighbourhood will be met with increase in commuter traffic | Ensuring pedestrian and cycling links are safe with appropriate crossing facilities will assist in creating walkable neighbourhoods |
| | 5. Connect all footpaths across Keighley district to allow access into town centre by foot | Noted |
| 13. Access | 1. Plan contradicts Tong NDP for access to green corridors, cycle and footpaths | Description amended to highway infrastructure improvements in South East Bradford. Work being undertaken to identify optimum solutions |
| 14. Canal tow paths | 1. BW supports use of Towing paths for sustainable travel to work, school, leisure etc. | Policy amended |
| 15. Buses | 1. One bus every 1&1/2 hours to Bradford and 1/2 hourly to Leeds | Noted |
| | 2. Need assurances of significant improvement and faster journey to Leeds and | Noted |

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| | Bradford | |
| 16. Quality bus corridor | 1. Will provide minimal improved potential to access rail stations | Noted |
| | 2. Proposal seem of little benefit to Addingham with minimal improved access to rail stations | Noted |
| 17. Congestion | 1. Using K&WVR would ease congestion in Keighley | Noted – ongoing considerations |
| | 2. Congestion on peak hour trains | LTP Railplan 7 will help to address growth issue |
| 18. Cycling | 1. Need public campaigns to increase cycling as mode of transport | Several initiatives ongoing |
| | 2. Applaud vision on cycling but there is a need for effective strategies and concrete plans within the document | CBMDC Cycling Strategy in place |
| 19. Public transport, walking and cycling & modal shift | 1. Concerned that growth is not directed to sustainable locations near sustainable routes encouraging modal shift | Accessibility standards will inform site locations |
| | 2. Need for growth near local settlement not outside so as to encourage walking and public transport use not car use | Accessibility standards will inform site locations |
| | 3. Withdrawing bus services between | Noted |

| | Bradford and Denholme will increase car use | |
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| Policy TR4 – Transport and Tourism | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL’S RESPONSE |
| 1. Transport & Tourism | 1. Support promotion of canal facilities | Noted |
| | 2. Spatial options need to provide flexibility as some development and uses are dependent on location of canal | Noted – amended wording |
| | 3. Important to note that it's not always possible to find sites adjacent to waterways for some dependent uses | Noted – amended wording |
| Policy TR5 – Improving connectivity in poorly services areas | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL’S RESPONSE |
| 1. Improving connectivity | 1. Metro supports community based transport schemes | Noted |
| | 2. Above could be expanded to make best use of existing services | Noted |
| 2. Connectivity | 1. If the proposed reduction in service of the 720 proceeds it will cut the village off to health services for those without cars. | Noted |

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| | 2. Recommends the restoration of the Bradford Canal and proposes the safeguarding of the route from future development | A decision regarding development of the canal will address this issue |
| | 3. para 2.78 should include reference to Leeds Liverpool canal | Noted – amend wording |
| | 4. Add routes of Leeds and Liverpool canal and Bradford canal route to fig.SS1 | Noted |
| | 5. Connect all footpaths across Keighley district to allow access into town centre by foot | Noted |
| 3. Accessibility | 1. Bingley has poor access to Bradford, Leeds, motorway and bottlenecks at Cottingley, Saltaire, Fox Corner, Canal Road | Noted |
| | 2. Rural roads already congested and affected by wintry conditions | Noted |
| 4. Para 6.10 | 1. States 50% of residents within 2km of proposed station but this clearly does not apply to new homes | New stations removed from the Plan except those that are already in process of being delivered |
| 5. Transport Links | 1. No feasible way of improving through narrow valley | Noted |
| 6. Airport | 1. Historically region has not exploited | Development is planned on A658 corridor which is a key route to the |

| | transport corridors leading to the airport | airport |
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| Policy TR6 - Freight | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Freight Strategy | 1. Would welcome more detail especially lorry parks | Freight Strategy was prepared at West Yorkshire level - Policy has now been amended |
| | 2. Support TR6 & recognise importance of freight partnerships in particular for A629, A6068, A56, A59 | Noted |
| | 3. Policy needs to align with LTP3 policy in development | Noted |
| | 4. Metro supports policy section B | Noted |
| | 5. Leeds Liverpool canal is not a commercial waterway | Noted – amended wording |
| | 6. Leeds Liverpool canal does not possess potential to transport water-bourne freight | Noted |
| | 7. Remove reference to water-bourne freight in policy TR6 | Reference removed |

Policy TR7 – Transport Investment and Management Priorities

| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
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| 1. Weak Infrastructure | 1. Even with proposed network expansion& Eastern Bypass expansion of Baildon not sustainable | Noted – though the valley bottom would provide the opportunity for new highway construction albeit at significant cost. • Traffic flows across Bradford have not increased over last 10 years though there was significant growth before then. • SERR would ease congestion on Baildon Road to some extent. • Improved public transport linkages to Baildon are required |
| 2. Public transport | 1. Welcome investment in KWVR | Comment acknowledged though decision on use of KWVR as a commuter service yet to be made |
| 3. Investment in infrastructure | 1. Serious overcrowding | The rail service to Leeds is operating at or near to capacity at peak times, though there is spare capacity on services to Bradford. Increasing rolling stock would require increased capacity at Leeds Station (already being considered but costly). Alternative of lengthening trains but this would require platform lengthening at a number of stations – including those on the Airedale Line if the current efficient operating pattern is maintained. |
| | 2. Need to have more rolling stock, line capacity, access to stations | Noted – see comment above |
| 4. Access to cities | 1. No substantial improvements proposed | Detailed site issue – to be considered in allocations DPD |
| 5. Infrastructure | 1. bypass needed for Ilkley | Some impacts in Leeds (where A65 Quality Bus Corridor has been developed). Main highways issue in Bradford would be impact on |

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| | | Otley Road corridor where SERR is included in Infrastructure Plan. Would need to test impact of individual developments on Ilkley highway network. Enhancements to Wharfedale Line recognised as being required |
| | 2. A650 should be for local traffic and M606 extended into Bradford | The extension of the M606 into Bradford is unlikely to be feasible in view of existing development in the West Bowling and East Bowling area. |
| | 3. Funding should not be limited to Sec. 278 agreements | Issues to be dealt with by Local Infrastructure Plan |
| | 4. Authority should include other mechanisms for improvements | Issues to be dealt with by Local Infrastructure Plan |
| | 5. Policies ID4, ID5 schedule needs updating for M62 and M1. Agency happy to talk | Issues to be dealt with by Local Infrastructure Plan |
| | 6. Comments made by agency on Infrastructure Plan and Strategic Housing Land Availability Study should be considered | Issues to be dealt with by Local Infrastructure Plan |
| | 7. Infrastructure should be addressed before building in Airedale and Wharfedale | Issues to be dealt with by Local Infrastructure Plan |
| | 8. Need for substantial improvements in rural areas | Noted |
| | 9. Frequent mentions of development but no recognition that some of these needs are immediate | Noted |

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| 7. Impact of new development | 1. Will LIP contain enough feasible/fundable measures | Requires model testing in conjunction with Leeds |
| 8. Infrastructure & National Grid | 1. National Grid want to be consulted on Apperley Bridge Station and Shipley Eastern Relief Road | Noted |
| 9. Transport investment | 1. L.C.R. and LTP3 set out strategic priorities | Noted |
| 10. New station | 1. Developer or LA funding will be needed until a station can cover all costs including additional rolling stock | New stations removed from the Plan except those that are already in process of being delivered |
| | 2. Transport Needs Assessment should be done to assess if new station is best option | New stations removed from the Plan except those that are already in process of being delivered |
| | 3. It is not apparent that proposed stations have strategic development basis | New stations removed from the Plan except those that are already in process of being delivered |
| | 4. New station increase journey time which results in loss of revenue and needs considering in business case | New stations removed from the Plan except those that are already in process of being delivered |
| | 5. Funding is committed for Low Moor and Apperley Bridge | Noted |
| | 6. In Metro's rail plan 6 there is no mention of Manningham, Laisterdyke or Beechcliffe stations | New stations removed from the Plan except those that are already in process of being delivered |

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| | 7. Train operator support is vital for any new station | New stations removed from the Plan except those that are already in process of being delivered |
| 11. Manningham station | 1. New station close to another struggles to secure DfT/rail industry support | New stations removed from the Plan except those that are already in process of being delivered |
| | 2. Timetabling must fit with Bradford/Leeds/Apperley Bridge & Kirkstall Forge | New stations removed from the Plan except those that are already in process of being delivered |
| 12. Laisterdyke station | 1. Maybe difficult to site due to topography | New stations removed from the Plan except those that are already in process of being delivered |
| | 2. Revenue abstraction from Bradford and New Pudsey may business case a problem | New stations removed from the Plan except those that are already in process of being delivered |
| | 3. New station is difficult because of turn around at Manchester/Leeds/Bradford stations | New stations removed from the Plan except those that are already in process of being delivered |
| | 4. May conflict with need to improve journey times | New stations removed from the Plan except those that are already in process of being delivered |
| | 5. Best served as a local stopping service. | New stations removed from the Plan except those that are already in process of being delivered |
| 13. Beechcliffe station | 1. Need more detail but may lead to revenue abstraction from Cononley, Steeton and Keighley. | New stations removed from the Plan except those that are already in process of being delivered |
| | 2. May conflict with proposed station at | New stations removed from the Plan except those that are already in |

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| | Crosshills | process of being delivered |
| | 3. May need to additional rolling stock to make train time TABLE WORK | New stations removed from the Plan except those that are already in process of being delivered |
| 14. Low Moor | 1. Metro funded development application to be submitted shortly | Noted |
| 15. Stations | 1. Makes suggestion for change of words to T1-D (3) | Noted |
| 16. Traffic lights | 1. At West Lane/Sureness Road/Oakworth Road may be necessary for North Dene devel. | Site specific issue, not covered in the Core Strategy. |
| 17. Rail links | 1. From LBIA to Forster Square via Shipley and on to Skipton by Aire Valley stations | Being considered through WY+TF |
| 18. Eastern bypass | 1. Would benefit the town | Highway network improvements to east of Silsden are identified in the Plan |
| | 2. However it would increase traffic in Keighley Town Centre | Noted |
| 19. Relief Road | 1. Gresley Road/Coney Lane/East Parade/Worth Way & Longcroft should be a priority | Noted |
| 20. Contradictory Plans | 1. New road in Tong NDP is different to road in LDF | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |

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| 21. NDP | road in NDP across Westgate Hill to Raikes Lane would be a rat run | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| 22. East Bradford link road | 1. Road in LDF suggests East Bradford Link Road being hugely expensive and taking up lots of greenbelt | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| | 2. New road through Westgate Hill are vague and ill conceived | See comment to point 1 above. |
| | 3. Accentuate rather than diffuse HGV usage of A650 at roundabout of Westgate Hill/Drighlington Relief road | See comment to point 1 above. |
| | 4. Do not believe road on option 2 plan would achieve objective of para. 7.15 | See comment to point 1 above. |
| | 5. Greenbelt needs highest level of protection | See comment to point 1 above. |
| | 6. Believe the roads will exacerbate rather than relieve problems of Holme Wood | See comment to point 1 above. |
| | 7. Road to Raikes Lane will become rat run into Holme Wood to avoid congestion | See comment to point 1 above. |
| | 8. Would constitute a barrier to Holme Wood and deny access to green belt and footpaths | See comment to point 1 above. |
| 23. Leeds Bradford Airport | 1. Against development of airport and support improvement to coach and rail links | Noted |

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| | encouraging British holidays | |
| | 2. No quality trunk roads or major improvement schemes in the pipeline | The West Yorkshire Plus Transport Fund includes some major proposals including a highway link to the Airport from the A65 in Leeds |
| Policy TR8 – Aircraft Safety | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Aircraft safety | | Agreed and noted |
| General Comments – Transport Systems | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Congestion | 1. Tong area already has congestion issues | Acknowledge the need to develop transport model in SE Bradford (including extension into Leeds and Kirklees) to determine impacts and develop solutions |
| | 2. Wharfe Valley | There is a longer term aspiration for a Shipley Eastern Link Road to assist with dealing with congestion in the Shipley area. LCC have introduced a major bus lane scheme at Kirkstall on the A65 which should encourage some modal shift to bus but this is less likely to be attractive to commuters travelling from the Wharfedale area of Bradford. It is likely that some additional modeling work will be required to determine the impacts on the Leeds network |
| | 3. Increase traffic on A660/659 | There is a longer term aspiration for a Shipley Eastern Link Road to |

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| | | assist with dealing with congestion in the Shipley area. LCC are developing a major bus lane scheme at Kirkstall on the A65 which should encourage some modal shift to bus but this is less likely to be attractive to commuters travelling from the Wharfedale area of Bradford. It is likely that some additional modeling work will be required to determine the impacts on the Leeds network |
| | 4. Roads in Leeds A657/A65 | LCC have developed a major bus lane scheme at Kirkstall on the A65 which should encourage some modal shift to bus. There is also a proposal to improve the Rodley Roundabout on the A657. It is likely that some additional modeling work will be required to determine the impacts on the Leeds network |
| | 5. A65, A658, A6038 | Detailed site issue – to be considered in allocations DPD |
| | 6. A65 at full capacity | A65 – model/review in partnership with Leeds |
| | 7. Link road would not be an alternative, to the upgrade of Tong Street | Description amended to highway infrastructure improvements in South East Bradford. Work being undertaken to identify optimum solutions |
| | 8. Continuous problem in Baildon will become worse with new developments | The Shipley Eastern Link Road (included in the Infrastructure Plan) will address many of the congestion issues encountered by Baildon residents |
| | 9. Apperley Road and canal bridge cannot support another development | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 10. More cross border implications need to be | Duty to cooperate will include cross border issues |

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| | taken into account | |
| | 11. 3100 houses will lead to increase in traffic | The Council is committed to consider and implement future enhancement schemes to ease capacity and congestion problems on all roads in the district |
| | 12. increased congestion will be seen on A65 | The Council is committed to consider and implement future enhancement schemes to ease capacity and congestion problems on all roads in the district |
| | 13. Severe delays on A65 at Victoria Ave. junction with Brook Street | The Council is committed to consider and implement future enhancement schemes to ease capacity and congestion problems on all roads in the district |
| | 14. Congestion also affect bus links with train stations | The Council is committed to consider and implement future enhancement schemes to ease capacity and congestion problems on all roads in the district |
| | 15. Additional housing will cause unbearable situation around Cottingley School | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 16. 800 houses will increase congestion | The Council is committed to consider and implement future enhancement schemes to ease capacity and congestion problems on all roads in the district |
| | 17. Park Road, Leeds Road and Thackley corner could not take extra traffic | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 18. Baildon traffic already congested at peak | The Shipley Eastern Link Road (included in the Infrastructure Plan) |

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| | times and roads have become rat runs | will address many of the congestion issues encountered by Baildon residents. Opportunities for public transport improvements will continue to be explored in conjunction with Metro |
| | 19. Baildon | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 20. A65 was at capacity in 2005 and things have worsened since. Extra housing will only increase the problem | Bus priority measures have been introduced on A65 by Leeds at Kirkstall and consideration will be given to further improvements on this corridor |
| | 21. A65 already unable to cope | A65 – model/review in partnership with Leeds |
| | 22. Critical points cannot be eased including junctions. In Menston and Guiseley | A65 – model/review in partnership with Leeds |
| | 23. Independent road report confirms dire state of A65 into Leeds and has no solutions available | A65 – model/review in partnership with Leeds. |
| | 24. Sever congestion on A60 at junction with airport | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 25. Buck Lane, serious delays at Cookridge and minor routes to Leeds ring road. | Site specific comment not covered in the Core Strategy. |
| | 26. A6038 to Bradford via Hollins Hill & Shipley where connectivity between Leeds and Bradford is causing concern | The Shipley Eastern Link Road (included in the Infrastructure Plan) will address many of the congestion issues on this corridor |

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| | 27. Roads from Menston to Ilkley, Otley & Harrogate not as bad unfortunately few people from Menston are employed there. | Noted |
| | 28. Increase in traffic on A629, A650 and A65 and congestion through Silsden, Keighley, Ilkley | Hard Ings Road Improvement will address congestion issues on A629 north of Keighley. Impacts of developments on other elements of the highway infrastructure will be considered at the DPD stage |
| | 29. Councils feel dualling of Hard Ings Road between Beechcliffe and B&Q roundabouts and one way flow in Keighley town centre will improve traffic flow | Hard Ings Road Improvement will address congestion issues on A629 north of Keighley. Gyratory scheme for Keighley Town Centre is in development |
| | 30. Major concern with increasing numbers of HGVs | Noted |
| | 31. Holme Wood estate and scale of proposed development will increase congestion significantly | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| | 32. Weight of traffic at peak times already ruins character of rural village | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| | 33. Narrow lanes that connect Tong with Home Wood would become more congested with new developments funnelling traffic onto them | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |

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| | 34. Tong Street already an enduring feature of life | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| | 35. Increased congestion damaging job prospects as investors relocate | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| | 36. Congestion could worsen struggle of service providers visiting clients | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| | 37. New homes would place strain on already congested network | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| | 38. Nature of Victorian centre makes more traffic unsustainable | Proposed development in Wharfedale has been scaled back |
| | 39. Proposed 6500 increase in population will effect car usage and congestion | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| | 40. Large number of developments in Guisley, Yeadon, Rawdon along A65 corridor has had a cumulative effect on congestion and | Noted |

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| | infrastructure | |
| | 41. Sites in Gilstead | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 42. Sites in Crossflatts | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 43. 14% growth in traffic since Bingley relief road | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 44. Since relief road traffic on rural roads has increased | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 45. Saltaire, Fox Corner, Mannigham Lane, Toller Lane | Canal Road and Shipley Eastern Relief Road will address this to some extent |
| | 46. Business will move out of Aire Valley if Victorian Road network is not improved | The Council is committed to consider and implement future enhancement schemes to ease capacity and congestion problems on all roads in the district |
| | 49. Request that measures be included to mitigate increased congestion on A650 from development in the Aire Valley | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 50. Do not believe the high occupancy traffic lane is solution to congestion on Tong Street | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |

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| | 51. huge increase in traffic on Wakefield road, Tong Street, Tong Lane, Holme Wood and Tong Village | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| | 52. High proportion of commuting is to Leeds, increase in housing will lead to further pressures into Leeds | A65 – model/review in partnership with Leeds |
| | 53. Housing growth has already affect A65 into Leeds | A65 – model/review in partnership with Leeds |
| | 54. Severe congestion on roads to Leeds and Bradford | Some impacts in Leeds (where A65 Quality Bus Corridor has been developed and further work may be required). Main highways issue in Bradford would be impact on Otley Rd corridor where SERR is included in Infrastructure Plan. |
| | 55. A65 significant increase affecting the town | Noted |
| | 56. 3100 new houses will bring significant increase to traffic | Noted |
| | 57. Village has undesirable, unacceptable densities and speed | Noted |
| | 58. Addingham already suffers traffic blight and peak level making walking unpleasant | Noted |
| 2. Rail service capacity | 1. Wharfe Valley | The rail service to Leeds is operating at or near to capacity at peak times, though there is spare capacity on services to Bradford. Increasing rolling stock would require increased capacity at Leeds |

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| | | Station (already being considered but costly). Alternative of lengthening trains but this would require platform lengthening at a number of stations – including those on the Airedale Line if the current efficient operating pattern is maintained |
| | 2. Investment in rolling stock required | The rail service to Leeds is operating at or near to capacity at peak times, though there is spare capacity on services to Bradford. Increasing rolling stock would require increased capacity at Leeds Station (already being considered but costly). Alternative of lengthening trains but this would require platform lengthening at a number of stations – including those on the Airedale Line if the current efficient operating pattern is maintained |
| 3. Infrastructure | 1. Weak infrastructure, development needs to match what's realistic | Corridor studies required to determine what realistic solutions are available to congestion issues that could arise from new development |
| | 2. No provision for road/rail capacity | Some impacts in Leeds (where A65 Quality Bus Corridor has been developed). Main highways issue in Bradford would be impact on Otley Road corridor where SERR is included in Infrastructure Plan. Would need to test impact of individual developments on Ilkley highway network. Enhancements to Wharfedale Line recognised as being required |
| | 3. Many roads not suitable for upgrading | Improvements to highway infrastructure will be made where required and feasible |
| | 4. Bridges are bottlenecks at present | Improvements to highway infrastructure will be made where required |

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| | | and feasible |
| | 5. The best use of existing infrastructure needs to be taken into account | The focus of the Local Transport Plan is to manage the existing network effectively before investing in new infrastructure |
| | 6. Bradford East Link road para 4.1.4 is seriously misleading, not accurately represented | Description amended to highway infrastructure improvements in South East Bradford. Work being undertaken to identify optimum solutions |
| | 7. 800 houses will impact on sustainable aspirations Education & Transport | Issues to be dealt with by Local Infrastructure Plan |
| | 8. Proposals needed to reduce burden on village roads | The Council is committed to consider and implement future enhancement schemes to ease capacity and congestion problems on all roads in the district |
| | 9. Motorway links and public transport much better in Bradford therefore should build on derelict land there first | Noted |
| | 10. Para 5.82 does not specify how road will be upgraded to link with new neighbourhood | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| | 11. Funding CIL or other | WYTF and CIL for infrastructure – bus operators or developers (or Metro under a QC arrangement) would provide initial funding to provide new/improved services provided they would be cost effective |

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| 4. Highway capacity | 1. Roads too narrow to increase traffic | Improvements to highway infrastructure will be made where required and feasible |
| | 2. Especially Ashville terrace, Elizabeth Street, Sykes Lane, East Royd, Maple Avenue | Detailed site issue will be considered in allocations DPD |
| 5. Access | 1. To facilities from Menston is problematic to less mobile | Detailed site issue will be considered in allocations DPD |
| | 2. new infrastructure (East Bradford Link Road) would prevent access to greenbelt from Holme Wood | Description amended to highway infrastructure improvements in South East Bradford. Work being undertaken to identify optimum solutions |
| | 2. Menston Old Lane too narrow | Detailed site issue – to be considered in allocations DPD |
| | 3. To Baildon is constrained be river and canal crossing | The Shipley Eastern Link Road (included in the Infrastructure Plan) will address many of the congestion issues encountered by Baildon residents |
| | 4. A657 traffic light crossing | The Shipley Eastern Link Road (included in the Infrastructure Plan) will address many of the congestion issues encountered by Baildon residents |
| 6. Parking | 1. Objective 10 p.31 improved access, no policy covering this | Accessibility and Car Parking policies and standards to be reviewed in Appendix |
| 7. Freeze on development | 1. need to see effects of new Tesco on traffic | Future modeling of individual sites would take Tesco generated traffic into account |

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| 8. Road Safety | 1. traffic calming causing problems for emergency services | Emergency services are consulted on traffic calming schemes |
| | 2. The junction where Green Lane meets Otley Road is a traffic Black Spot - Additional housing will exacerbate problem | Site specific issues to be dealt with by Allocations DPD and or site planning application. Shipley Eastern Link Road would address issue. |
| 9. Environment | 1. 2700 houses, bring high car dependency and adverse traffic effects | Level of car dependency would depend on level of public transport provision to the new housing. CBMC will work with Metro to ensure public transport provision is optimised |
| 10. East Bradford link road | 1. no convincing evidence that a link road would alleviate pressure on A650 | Description amended to highway infrastructure improvements in South East Bradford. Work being undertaken to identify optimum solutions |
| 11. Road Network | 1. Road between Addingham and Silsden first rendered impassable in severe winter conditions | This issue cannot be resolved by LDF Core Strategy |
| | 2. Ilkley has one major road that needs to be improved to cope with extra development | The Council is committed to consider and implement future enhancement schemes to ease capacity and congestion problems on all roads in the district |
| | 3. Wilsden Main Street unsuitable for heavy traffic | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| | 4. Poor roads/ sites around Micklethwaite | Area and site specific issues will be dealt with through the Allocations DPD and/or site planning application |
| 12. Strategic Network | 1. Support is given for engagement with | Noted |

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| | Highways agency re M606 but engagement with other partners re the strategic network is also needed | |
| | 2. Concern about usage of terms | Document amended |
| | 3. Infrastructure and Public trans. Should be in core document. | Document amended |
| | 4. Change wording to agency role in travel planning | Reference now made to the Highways Agency's suite of integrated demand management measures. |
| 13. Transport network | 1. Shipley has good links and suitable brown field sites | Noted |
| 14. Tong Village | 1. Development be devastating on traffic through village | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| | 2. Nowhere does option 2 mention the effect of conservation on the village if the development goes ahead | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| 15. Accessibility | 1. Already difficult to access medical, schools and retail centres | Highway infrastructure improvements in South East Bradford have been identified in Plan. Work being undertaken to identify optimum solutions |
| 16. Public Transport | 1. Location of Baildon station is not easily accessible to most residents. Baildon station | Opportunities for public transport improvements require discussion with Metro |

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| | is not staffed and has no CCTV security. Baildon station is not staffed and has no CCTV security | |
| | 2. Parking at Baildon station is very limited | Car Parking provision subject to periodic review |
| 17. Baildon | 1. Commuting leads to traffic congestion and pressure on public transport | The Shipley Eastern Link Road (included in the Infrastructure Plan) will address many of the congestion issues encountered by Baildon residents. Opportunities for public transport improvements will continue to be explored in conjunction with Metro |
| | 2. West Lane - Previous development together with new development adds to heavily congested road | Site specific issues to be dealt with by Allocations DPD and or site planning application |
| 18. Buck Lane Employment Village | 1. Development will add to congestion problem | Site specific issues to be dealt with by Allocations DPD and or site planning application |
| 19. Shipley Eastern Link Road | 1. Early development will alleviate traffic problems | The Shipley Eastern Link Road (included in the Infrastructure Plan) will address many of the congestion issues |
| | 2. Development of new road should be a prerequisite to any further development | Site specific issues to be dealt with by Allocations DPD and or site planning application |
| 20. M606/M62 | 1. Impact on motorways from further employment development | BDMC to work with Highways Agency to test impact on strategic road network |
| 21. Ilkley | 1. IL/011 / IL/012 - development would create hazardous access from A65 | Site specific issues to be dealt with by Allocations DPD and or site planning application |

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| 22. A65 | 1. because improvement is restricted so is potential for sustainable development | A65 – model/review in partnership with Leeds |
| 23. Impact of new development | 1. in Leeds/Bradford corridor A647/A6110 | Requires model testing in conjunction with Leeds |
| 24. Development in Airedale | 1. increased pressure on M606 A650 A647 and A6110 | Requires model testing |
| 25. Holme Wood Expansion | 1. Suitable transport options | Further information to be provided as project progresses |

SECTION 5: PLANNING FOR PEOPLE: HOUSING

10 Principles For Achieving Sustainable Housing Growth

| SUMMARY OF MAIN ISSUE RAISED | SUB-ISSUE | COUNCIL'S RESPONSE |
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| 1. The Content and Wording of the 10 Principles For Achieving Sustainable Housing Growth | 1. The re-use of buildings (as well as land) should be mentioned | Agreed. A minor amendment has been made accordingly |
| | 2. Yorkshire Water strongly supports point 4. As stated in SC5, it is essential that development is phased in line with infrastructure. | Support noted |

Policy HO1 – The Scale of Housing Required

| SUMMARY OF MAIN ISSUE RAISED | SUB-ISSUE | COUNCIL'S RESPONSE |
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| <p>1. The policy doesn't state what the requirement actually is.</p> | <p>The policy does not state clearly what the total net housing requirement is for the district. The policy breaks down the annualised district requirement into three phases. The first phase is history (2004-2008). Any deficit from this period should be rolled forward into the requirement for the remainder of the plan period.</p> | <p>Policy HO1 was drafted to explain the links between the RSS and how the housing requirement has been resolved in the CSFED. It is accepted however that it would be helpful for revised document to include the headline target in Policy HO1. The Plan in fact does include the deficit of new homes over the preceding period.</p> |
| <p>2. Support for the proposed level of housing growth.</p> | <p>Support was received for the following reasons – a robust approach as it is based on RSS and a review of more recent data; local housing needs will be satisfied and bring a larger and more diverse population which will support businesses;</p> | <p>Support noted.</p> |
| <p>3. Inconsistency between Policies HO1 and HO2 with regard to the need for green belt release.</p> | <p>The majority of the projections for each phase are based on the use of brownfield sites and vacant properties. It is considered that the housing projections set out within policy HO1 are unrealistic and will not be met without the use of green belt land provisions. It can therefore be argued that the Councils</p> | <p>The objection is unfounded. There is nothing within the policy or text of Policy HO1 to suggest that green belt releases will not be necessary or anything which contradicts Policy HO2 - moreover it is not the role of Policy HO1 to address the key land supply components to meet the target - this is set out in policy HO2. It is also entirely incorrect to state that the targets are intended to be based predominantly on brownfield sites and vacant property. The</p> |

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| | <p>approach to the need for green belt releases have been contradictory within the Core Strategy DPD. In order to meet with housing targets set out by the council, as well as develop the growth areas listed, such as Holme Wood, it is considered that the release of green belt land will be necessary.</p> | <p>targets for PDL contained within Policy HO6 show this.</p> |
| <p>4. Objection to Policy HO1 on the basis that it sets the housing requirement too low.</p> | <p>1. NLP's own modelling suggests a housing requirement that should be set at 3000 dwellings per annum.</p> | <p>The Council has commissioned an independent Housing Requirement Study from Consultants GVA and Edge Analytics and the revised Policy HO1 housing requirement has been based on this work and its conclusions.</p> |
| | <p>2. The figure should be higher still to support the jobs target set out in the Core Strategy.</p> | <p>The Housing Requirement Study commissioned by the Council has factored in projections of economic and jobs growth over the plan period.</p> |
| | <p>3. The SHMA indicates household growth of 3100 dwellings per annum.</p> | <p>The figures quoted from the first SHMA relate to projections which are now out of date. The Council has commissioned an independent Housing Requirement Study from Consultants GVA and Edge Analytics which considers the latest Government issued household projections, and the revised Policy HO1 housing requirement has been based on this work and its conclusions.</p> |
| | <p>4. The plan period should be extended beyond 2028. It should be fixed to cover 15 years from the date of expected adoption of the Allocations DPD.</p> | <p>The plan period has been extended to 2030 in line with Government guidance which indicates that the plan should cover the period of 15 years from expected date of adoption. The Core Strategy is expected to be adopted in early 2015.</p> |

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| | <p>5. Based on an analysis of the 2008 based household projections the proposed target is short by some 5300 dwellings. The target should be set at a minimum of 3000 per annum.</p> | <p>The 2008 based projections are now out of date and have been superseded by the new interim 2011 based projections.</p> |
| | <p>6. The Council need to make up for a shortfall in meeting the housing requirement in the early years of the plan period. For the period of 2004 – 2010 the shortfall was 2,737 dwellings.</p> | <p>The housing requirement set out in table HO2 of the CSFED does include the shortfall as does the revised housing requirement set out in the publication draft document.</p> |
| | <p>7. The HBF do not support the identified housing requirement as stated. The 2008-based household projections indicate the formation of 63,000 households over the plan period of 2004-2028. For the period 2008 to 2028 the need is 56,000 homes. The proposed plan target of 45,500 represents a very serious shortfall.</p> | <p>The Yorkshire and Humber RSS was still at the time of CSFED publication part of the statutory development plan for the district and as such the Council's Core Strategy was required to be in broad conformity with the policies of the RSS including the housing targets. Even if the RSS had been revoked it is surprising that the HBF apparently think that a housing requirement can be judged simply by translating the Government's trend based projection in the expected increase in households into a housing target and taking no other data and factors into account. The HBF are presumably aware that the RSS did not take such a simplistic approach. Regardless of these matters, the Council has reviewed the need for new homes by the commissioning of an independent Housing Requirement Study which looks at a range of factors including the latest trend based projection of population and households issued by the Government. The inconsistency in the comments made by the HBF is also noted</p> |

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| | | – while the HBF criticise the Council for applying past completions to the housing requirement calculation back to the year 2004, it then quotes household projection data for the period from 2004 to support its arguments over the housing target. |
| 5. Housing requirement - alignment to the Regional Spatial Strategy. | 1. Support the use of the RSS as a base for the districts housing needs | Support noted. |
| | 2. Object to the use of the RSS 2,700 annual requirement. The most up to date forecast is 2,800 and there is no need to move from this position. | Disagree. Firstly the RSS was still part of the statutory development plan at the time of the CSFED. Secondly the figures referred to are household projections not estimates of need. The RSS quite rightly used modelling of household growth as only one of the factors which determine future targets for housing. Finally the Council has commissioned an independent Housing Requirement Study from Consultants GVA and Edge Analytics and the revised Policy HO1 housing requirement has been based on this work and its conclusions. |
| | 3. Question the basis for the overall figure of housing requirement of 45,500. This figure comes from the earlier Regional Spatial Strategy and pre-dates the current severe economic downturn. Low economic growth, reduced bank lending and mortgage availability are predicted to last for at least half the 15 year LDF plan period. This will affect the demand for and delivery of 45,500 homes | At the time of preparation of the CSFED the RSS still formed part of the legal statutory development plan. However this is no longer the case and the Council has commissioned an independent Housing Requirement Study from Consultants GVA and Edge Analytics and the revised Policy HO1 housing requirement has been based on this work and its conclusions. |

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| | within the plan period | |
| | 4. I have yet to see any evidence that the volume of houses lifted from the regional spatial strategy is required to meet the needs of Bradford's population | The RSS was a well thought out document which was based on the evidence available at the time much of it in the form of the projections of population and household growth issued by the Government. It went through a full public examination and was found to be sound. However the RSS has now been revoked and Core Strategy has to be based on the current projections issued by the Government. The Council has therefore commissioned an independent Housing Requirement Study from Consultants GVA and Edge Analytics which considers the latest Government issued household projections, and the revised Policy HO1 housing requirement has been based on this work and its conclusions. |
| | 5. HO1 is not compliant / in general conformity with RSS due to the inclusion of a depressed annual requirement for part of the plan period. | The RSS has now been revoked. The Council has therefore commissioned an independent Housing Requirement Study from Consultants GVA and Edge Analytics which considers the latest Government issued household projections, and the revised Policy HO1 housing requirement has been based on this work and its conclusions. |
| 6. Objection to reduction of the target to reflect weak market and economic conditions over the period 2008-16 | Objections were made for the following reasons: this is not valid reason to reduce the requirement; housing need still exists regardless of the people's ability to purchase homes; it is contrary to Government policy; it will exacerbate the problem of catching up | The comments are noted. In line with Government policy no such reduction has been made to the housing requirement in Policy HO1 of the publication draft. Moreover Policy HO1 has been based on the work of consultants GVA and Edge Analytics which itself factors in projections of economic growth and jobs growth over the plan period. |

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| | with unmet need later in the plan period; the 10% reduction figure is arbitrary; short term economic conditions should not be used to determine long term housing needs. | |
| 7. Support for the reduction of the housing target to reflect weak market and economic conditions over the period 2008-16. | Support the aim to minimise the risk of allocating housing development in green belt land which may not actually be required over the plan period. | See response above. |
| 8. Objection to the use of phased targets. | 1. One target for the whole plan period should be applied | The comments are noted. The housing targets at CSFED had to be based on those within the RSS as this at the time was part of the legal statutory development plan and the RSS itself included phased targets. However Policy HO1 of the publication draft document now included just one single target for the period 2013 to 2030. |
| | 2. The first of the RSS periods (2004-8) has now passed and should therefore be excluded. | See response above. |
| 9. Objection to Policy HO1 on the basis that it sets the housing requirement too high. | 1. Get other areas to take Bradford's population – population overspill should be transferred to other local authorities who wish to increase in size. | The Government's National Planning Policy Framework states that Local Plans should plan positively for the development and infrastructure required in the area and that they should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. The objector's proposal would not accord with these general principles. Bradford is able to meet its own requirements and the adjoining authorities, with whom the Council |

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| | | engages and consults, have equally pressing challenges regarding projected population growth and the consequent need for new homes. |
| | 2. Lack of jobs - while the proposed number of addition houses might be realistic in terms of projected raw population growth it may well be a significant over estimate of the actual demand unless there is significantly more success in job creation. | There are several drivers of the future need for new homes only one of which is the economy. Population increase in Bradford is also closely linked to the age structure of the population and rates of natural increase. The independent Housing requirement Study which the council has commissioned from consultants GVA and Edge Analytics has factored in both demographic and economic factors. |
| | 3. A number of comments were received suggesting that the targets should be lower to take account of the weak housing market; that there may not be the purchasing power to justify the proposed build and that there are many RUDP housing sites yet to built out. | The Government has confirmed in its guidance and via the decisions of the Planning Inspectorate such as at Kirklees, that purchasing power or the ability to buy homes is not a factor which can be used to set housing targets. It is the Council's role to objectively assess need and then provide for in full the needs of the district. With regard to RUDP sites, there are a variety of reasons why some of the RUDP sites have yet to be built. A key reason is that a large number of sites were only released in August 2008 as part of the RUDP phasing policy and the subsequent credit crunch and recession has prevented their take up. This does not however mean that the need for new homes does not exist. |
| | 4. A number of comments were received which expressed doubt about the accuracy and trustworthiness of the population | There are a number of important points. The projections issued by the government are not forecasts and are based on recent trends; this is why they are updated on a regular, roughly 2 yearly basis. |

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| | <p>projections.</p> | <p>The projections are made by qualified professionals and details are available on the ONS website of how the projections are produced and quality assurance. Most of the objections on this matter do not stress why they consider the projections unreliable.</p> <p>However regardless as to objector views expressed, the Council is required by the government to base its housing need assessments on the official ONS population projections and CLG household projections.</p> <p>However it is acknowledged that these projections are not the only data by which housing need should be assessed and it is also useful to see the effects of changing one or more of the assumptions contained within the Government projections such as on migration.</p> <p>The Council have therefore commissioned a Housing Requirement Study to look at some of these issues and to project future housing need both on the basis of the Government projections and the projections for the district's economy. This work has informed the final district wide housing requirement in the publication draft document.</p> |
| | <p>5. Several comments were received suggesting that the past censuses showed Bradford's population declining / stable since 1991 and that therefore future projections of population growth have been exaggerated.</p> | <p>Disagree. The district's population did rise between the 1991 and 2001 censuses and then the rate of increase has accelerated between 2001 and 2011. The projections issued by the ONS show very rapid population growth over the plan period to 2030 driven in larger part by natural increase in turn reflecting the young age structure of the district's population.</p> |

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| | <p>6. We accept that population growth may occur in the Bradford District. However, we question whether the predicted rise in numbers of households, and hence housing demand, will actually occur to the extent indicated. The estimates are based on recent trends (5.2.11) that are unlikely to continue in the next decades.</p> | <p>The revised housing target within Policy HO1 has been based on the Housing Requirement Study carried out by consultants GVA and Edge Analytics and this work has in turn incorporated the most up to date projections.</p> |
| | <p>7. The ONS figure for predicted population growth is only one of a number of forecasts. The UPTAP-ER for example puts the predicted figure for 2026 at 45,000 less than ONS. It would be short sighted to release significant green belt solely based on the ONS figure.</p> | <p>Policy HO1 has not been based solely on ONS projections. However it is a requirement that Council's use the projections issued by the government as the cornerstone of their assessment of objectively assessed need for new homes.</p> |
| | <p>8. Population expected to peak in 40years then drop. No account if this taken in figures</p> | <p>The Core Strategy relates to a 15 year time period not a 40 year period.</p> |
| | <p>9. National policy on restricting immigration does not appear to have been considered</p> | <p>The Government requires Council's to use its official population and household projections to estimate future need and these population projections include projections of future levels of domestic and international migration.</p> |
| | <p>10. Has any analysis of likely deaths in elderly households and movement to retirement accommodation been taken into account,</p> | <p>The housing requirement figure is required to reflect net household change and therefore churn within the existing housing stock is taken into account.</p> |

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| | which would free up homes to the market. | |
| | 11. All housing need can be accommodated on identified land without further estimates for years 7-12 | The statement is not correct and not relevant to Policy HO1. |
| | 12. Concerns are raised that the housing target should be lowered due to already high levels of air pollution and road congestion. | Road congestion is not just a problem within Bradford and needs to be reduced and addressed where it occurs. It is not however a valid reason for failing to provide homes for the district's expanding population which the Government requires Bradford to do. Policy EN8 sets out the Council's approach to air quality. |
| | 13. We have to provide a five year supply of housing land, currently we have enough and there is no need to identify new sites | The statement is not correct and not relevant to Policy HO1. |
| | 14. It is suggested that some of the requirement is for the wider Leeds City Region beyond Bradford. | This is not the case. The housing requirement is set to meet need within the Bradford district. |
| | 15. The Highways Agency notes that the annual number of completions increases in each of the three five year periods set out in the policy and, given that forthcoming DPDs are to assess and adjust allocations in accordance with completions over time, there is potential for these to increase further in the latter years. Hence the Agency would expect | The comments are noted and full consultation with the Highways Agency will continue to take place as part of both the Core Strategy and the Allocation DPD. It should however be noted that the revised Policy HO1 now includes a single annual housing requirement over the period 2013 to 2030. |

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| | this to be the subject of further consultation at the appropriate time. | |
| | 16. The demographic forces that require and increased stock of housing are to be found in the relatively younger populations of Bradford and Keighley. | The population is now increasing across most of the district though as the objector points out this is and will occur most rapidly in the urban areas and populations of the district which have younger age structures. This is however not a matter for Policy HO1 and is more relevant to the housing distribution approach in Policy HO1. Here the objector will note that the housing distribution is indeed very heavily weighted towards those urban centres. |
| | 17. CBMC should revisit targets set by national government and be forerunner in declaring that population growth rates need to come down | The Government do not set targets but do issue projections of future population change. The suggestion made by the objector is impracticable and beyond the powers and influence of the Council who must abide by national planning policy issued by the Government. |
| 10. How the target is expressed | 1. It would appear the figures do not take full account of the empty housing stock. | Incorrect. The housing target is a net target and it is explained in both the policy and the supporting text that the final gross target will need to take account of both future losses through demolition and clearance and future gains through reduction in the number of vacant homes. |
| | 2. Without assessing future clearances and changes of use the housing requirement is flawed | Disagree. The policy and text explains that the target is a net target not a gross target. |
| | 3. The housing requirement should be treated as a minimum figure and not a ceiling target. | The target as worded was not intended nor expressed as a ceiling. However it is acknowledged that clarification via a wording change |

| | | to insert the words 'at least' would reflect the most recent interpretation of the Government's guidance as indicated from other Core Strategy EIP's |
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| Policy HO2 – Strategic Sources of Supply | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. General support | Support - the approach set out in the policy is robust. | Support noted. |
| 2. Clarity of the approach | 1. A general comment that the approach is very unclear. | The objector has not specified in what way they consider the approach unclear so it is difficult to comment. |
| | 2. The policy delegates the identification of key sites to allocations documents. The draft NPPF does not really allow for or encourage the preparation of other development plan documents outside of the Local Plan. Decisions regarding strategic sites should be made in the core strategy (paragraph 109 of the draft NPPF). | Disagree. Bradford like many other council's who have progressed their plans since the NPPF have opted to continue progress on their Core Strategy and prepare separate allocations DPD's. There is nothing in the NPPF which prevents Council's from taking this approach. |
| | 3. The policy is unclear about the timescale for the Green Belt review. It also needs to be much more specific about the locations where deletions of the Green Belt will need to be considered. | The Council's approach to green belt is spelt out in Policy SC7 and its accompanying text. |

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| | <p>4. The policy as drafted does not explicitly reflect the approach set out in, for example, Policy 1 (BD1) C</p> | <p>The goal of Policy HO2 is to set out in broad and strategic terms the main elements and sources of supply to meet the requirements set out in Policy HO1. The policy does not aim to specify each and every element of the sub area approach. It is neither necessary nor helpful to simply repeat elements of the sub area policies within HO2. Furthermore if this was done in the case of BD1 then it would have to be done extensively across all elements of all parts of the sub area policies which would gain nothing other than to make Policy HO2 very long unwieldy and less consequently clear. Policies BD1 and HO2 should be read together.</p> |
| <p>3. Strategic Sources of Supply - Completions Since 2004</p> | <p>1. The HBF note the housing requirement is calculated on the basis of a period from 2004 to 2028. It seems odd that the beginning of the plan period is so far in the distance. We do not feel this is acceptable and we suspect that the Council is doing so in order to benefit from a higher number of completions achieved in the pre-recession era and deduct these from the residual housing requirement.</p> | <p>The document clearly explains that the period starts at 2004 because the RSS, which was then still part of the statutory development plan, starts at this point. The Council was not picking this period for any other reason and actually, if the objector had taken the time to look at the data, it would be apparent that the cumulative completions compared to RSS requirement over the period 2004-8 were in near balance. It is therefore disappointing that the objector has chosen to make the accusation that the Council has chosen these years because of the objectors assumption that there is a benefit with regards to the number of completions in these years.</p> |
| | <p>2. We dispute the number of completions achieved. The Council states that it has completed 9,599 dwellings between April 2004 and March 2011. DCLG Table 253:</p> | <p>The housing completions are accurately recorded in the AMR and the CSFED and Publication Draft. It is the DCLG figures which are incorrect and undercount completions as the DCLG were for a period only supplied with data relating to Building Control returns</p> |

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| | House building: permanent dwellings started and completed by district shows that 6,440 homes were completed in Bradford in the period 2004-5 to 2009-10. Data for 2010-2011 is not yet available. This is some 3,000 dwellings fewer than the Council maintains have been completed in the district. This deficit will need to be added to the residual dwelling requirement for the remainder of the plan period. | and did not also receive NHBC data. |
| | 3. Housing completions since 2004 should be deleted from the policy. | Disagree. In addition to setting the overall housing requirement, it is essential that the Core Strategy is clear about the number of new homes which remain to be planned for, and thus land allocated for, and this is affected by the number of net completions which have already been added in the period since 2004. |
| 4. Strategic Sources of Supply - Windfall | Objections have been made to the inclusion of a windfall allowance on the following grounds: there can be no certainty that windfall sites will come forward; a number of factors will result in reductions in windfall compared to previous years; windfall sites are a finite source; sources such as employment sites no longer needed / suitable for employment use have already been identified and therefore cannot be windfall; the council remove | Since the CSFED was produced a number of circumstances have changed. The NPPF has been issued and is clearly not supportive of making allowance for windfall other than in exceptional fully justified circumstances and even then only within the first 5 years of the plan period; however the council's SHLAA has now reduced its site size threshold and therefore a previously significant source of windfall over the first 5 years of the plan period will now be included in the known land supply and thus cannot be counted as windfall. The Government has set out in its NPPF that Council's should plan positively and make provision for a significant boost to housing |

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| | windfall and give more certainty by releasing more land from the green belt. | delivery. It is therefore considered extremely important that there is certainty in the land supply. Therefore on balance it is agreed that there should be no allowance for windfall within the Core Strategy. |
| 5. Strategic Sources of Supply – Safeguarded Land | Suggestion that safeguarded land should be a source of supply within the policy and described as an acceptable location for new housing development. Also the policy should state that such areas will be granted permission as proposals come forward. | Paragraph 5.2.30 of the CSFED acknowledges that in the light of the land supply constraints revealed in the SHLAA, safeguarded land will be required to contribute to meeting the need for new homes. Safeguarded land has therefore been included as a strategic source of supply within the revised Policy HO2. However it is not accepted that either the policy or the text should be worded to indicate that all such sites will be allocated. This would fetter the process of preparing the Allocations DPD where decisions on which sites should be allocated to meet need in the most sustainable way possible will and should be taken. Nor is it accepted that the policy or text should indicate that planning permission will be granted as and when proposals on safeguarded land come forward. |
| 6. Designated growth areas | 1. Concern over the scale of proposed development in Menston due to impact on green belt, green belt gap between Leeds and Bradford and due to traffic congestion. | The points made are noted and while not agreeing with all of them, the position of Menston within the settlement hierarchy, its status as a growth centre, and the level of housing development allocated have all been reassessed in the light of the updated evidence base and the Habitats Regulations Assessment. Menston has now been removed from Policy HO2 as a growth centre, been downgraded in the settlement hierarchy to a 'Local Service Centre' and its housing target cut from 900 to just 400 new dwellings over the period to 2030 (see Policy HO3). |

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| | <p>2. Concern over the identification of Burley as a Growth centre</p> | <p>The position of Burley In Wharfedale within the settlement hierarchy, its status as a growth centre, and the level of housing development allocated have all been reassessed in the light of the updated evidence base and the Habitats Regulations Assessment. Burley has now been removed from Policy HO2 as a growth centre, been downgraded in the settlement hierarchy to a 'Local Service Centre' and its housing target cut from 500 to just 200 new dwellings over the period to 2030 (see Policy HO3).</p> |
| | <p>3. Concern over the identification of Silsden as a Growth centre</p> | <p>The comment is noted. While it is considered appropriate that Silsden remains a growth centre within the plan the exact level of growth has been reappraised in the light of the updated evidence base and the Habitats Regulations Assessment. The planned number of new homes for Silsden set out in Policy HO3 has therefore been reduced from 1700 to 1000 new dwellings over the period to 2030 (see Policy HO3).</p> |
| | <p>4. Support for identification Queensbury as a growth area. Queensbury has good bus and road connections to employment, shopping and leisure attractions within the Principal Town of Halifax and the City of Bradford. As one of the most accessible and sustainable local centres located along key public transport corridors, Queensbury should be a focus for local housing, employment and supporting community facilities</p> | <p>Support noted.</p> |

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| 7. Holme Wood Urban Extension | 1. Support for the area based initiatives, in particular the urban extension and SE Bradford growth area. | Support noted. |
| | 2. Concerns over the proposal due to the loss of green belt between Leeds Bradford, possible coalescence between Leeds and Bradford. | The NPPF makes it clear that it is perfectly acceptable for Local Plans to contain proposals for the use of green belt land to meet future development needs where there are exceptional circumstances which justify it. There are clearly such exceptional circumstances within Bradford. The district needs to make provision for a very large number of new homes over the plan period and the available and deliverable land supply is insufficient to meet this need in non green belt locations. Having established that there is a need for green belt deletions it is important that deletions are focused where possible in the most sustainable locations and in reasonable proximity to the areas of greatest need i.e. the Regional City of Bradford. The Growth Study has examined potential areas for green belt release across the district and has indicated that the Bradford SE area, which includes Holme Wood performs favourably and strongly against its appraisal criteria, should be a particular focus for such growth. Moreover the Growth Study and the work carried out by consultants and as part of the Local Neighbourhood Plan indicates that the proposed urban extension can be accommodated without undermining the role and functioning of the green belt between Bradford and Leeds. The proposed urban extension would in no way result in the coalescence of the two cities of Leeds and Bradford. The work also points out the benefits with |

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| | | regards to regeneration and investment which would be secured as part of the delivery of the urban extension. |
| | <p>3. Concern over the proposal to build 2000 houses on the edge of the village of Tong. It would appear from the plans that it would encroach within ½ mile of the first of the village houses and probably would be within the village boundary. In our opinion this would wholly destroy the integrity of Tong as a unique village positioned between the Leeds and Bradford city areas.</p> | <p>The proposal is for an urban extension to the existing urban area adjacent to Holme Wood estate, not an extension to Tong Village.</p> <p>The Core Strategy does not set out the boundaries of the proposed urban extension. These are matters which have been assessed and consulted upon within the Holme Wood Neighbourhood Plan. It is not considered that the proposals would have the claimed effects on Tong Village. Furthermore amended policy SC7 sets out clear parameters to test the impacts on green belt functions in line with the NPPF when considering the revision of green belt boundaries.</p> |
| | <p>4. Concerns over the transport elements of the proposed urban extension, the proposed East Bradford Link Road, increased traffic congestion, and possible impacts on the motorways.</p> | <p>It is considered perfectly possible that the proposed urban extension can include a package of road and public transport improvements and investments to mitigate any effects and potentially to improve traffic flows in some areas. Detailed proposals will be brought forward as part of the Allocations DPD and consultation with the Highways Agency and with the local community will continue.</p> |
| | <p>5. Concerns over the loss of countryside and of a green lung;</p> | <p>Amended policy SC7 sets out clear parameters to test the impacts on green belt functions in line with NPPF when considering revising the boundaries in the Allocations DPD. The sub area policy BD1 recognises the importance of green belt in this location and seeks to improve the area an accessible green space for local communities.</p> |

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| | 6. A large urban extension will lead to lack of integration between current and future residents. | There is no reason why this should be the case particularly given good design. The Holme Wood Neighbourhood Plan looks holistically at the improvement of both the existing estate and the creation of the new urban extension. |
| 8. Strategic Sources of Supply – green belt. | <p>1. Supports the policy for green belt releases to help provide the required supply of land in the light of the statement in paragraph 5.2.30.</p> <p>2. There are limited opportunities for development on brownfield sites in the urban areas. The Council has correctly identified that the city requires a significant number of new dwellings and that the majority of these will need to come from new sites. The consideration of sustainable Green Belt sites on the edge of existing settlements is a pragmatic way to address the shortfall in housing land.</p> | Support noted. |
| | 3. All green belt land should be afforded highest protection and should only be used in exceptional circumstances | Green belt is given substantial protection in line with NPPF. However national planning specifically allows for changes to the green belt to be made in exceptional circumstances as part of preparation of Local Plans. The Core Strategy has clearly outlined the scale of new housing required and it is clear that these needs cannot be met without changes to the green belt. |
| | 4. Green belt land should never be used and | The objectors seek to rule out use of green belt land apparently |

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| | green field land only rarely. | whatever the circumstances. This is completely contrary to national planning guidance which does allow for the release of green belt land in exceptional circumstances and in particular where the development needs of the district cannot be met elsewhere. The need for green belt land to meet such needs in the district is clearly justified by the evidence base. Likewise there is no justification for taking blanket positions on only allowing development on green field sites rarely without having regard to the local circumstances in particular the availability of developable sites. |
| | 5. Using green belt land does not accord with the principles of sustainability. | Whether individual sites or wider strategic policy options are broadly sustainable depends on a much wider range of issues than a simple classification as to whether a site is green belt or green field or not. It is perfectly possible for green belt sites to lie in sustainable locations. each site and area must be judged on its merits. |
| | 6. Local green belt releases should follow a comprehensive green belt review | The Core Strategy does not itself release land from the green belt. The consideration of green belt deletions via local reviews and the background work to underpin this is a matter for the site allocations and area action plans. Wider green belt policy is set out in Policy SC7. |
| 9. Sources of supply not covered / mentioned in Policy HO2 | 1. Policy HO2 fails to mention quarry sites as a strategic source of supply - sites such as those at Bolton Woods and farley quarries are previously developed land and of a strategic scale that should be acknowledged. | There is nothing in the plan which would prevent such areas contributing to the land supply and meeting some of the need for new homes over the plan period. However it is not considered that such sources are large enough to warrant a specific mention in Policy HO2. |

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| | 2. Derelict properties in the area should be regenerated in the area before considering new builds. Develop old mills before considering new builds. | The Core Strategy envisages that there will be a continuing contribution to meeting need from such sources and this is reflected in some of the sites already in the SHLAA and with planning permission. However such sites will not always be developable or viable or in locations where there is sufficient demand for flats and apartments and it would be neither appropriate nor possible to prevent new build developments which will inevitably make up the majority of future provision. |
| | 3. A holistic approach needs to be taken supports the districts priorities of regeneration | The comments are noted. |
| 10. Supply - SHLAA | Aside from needing to identify additional sites we do not accept the SHLAA calculation of supply. A number of sites in the SHLAA have been rejected and dismissed in some instances without suitable reasoning. To some degree the first SHLAA sieve of sites appears to have been crudely undertaken and sites have inevitably been dismissed unnecessarily. | The methodology for the SHLAA was agreed with the SHLAA Working Group following a period of external consultation. The Working Group at that time included representation from the objector's company. We therefore consider that methodology to be appropriate and fit for purpose. The individual site appraisals also had input from the developer representatives on the SHLAA Working Group. If the objector can be more specific with regards to each site which has been 'unnecessarily discounted' then the working group will be able to take these comments into account in future SHLAA revisions |
| Policy HO3 – Distribution of the Housing Requirement | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Support for the policy | 1. We generally support the approach taken in | Support noted. |

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| | Policy HO3 in terms of the apportionments between settlements. | |
| | 2. Yorkshire Water is generally supportive of the Core Strategy; both the policies identified and level of growth in each settlement. | |
| | 3. More homes are needed in Bradford | The comment is noted. |
| | 4. Bradford would be a safer place and more attractive to investors, thus sustainable if more homes are built there. | The comment is noted. |
| | 5. Metro supports the settlement hierarchy as the existing public transport infrastructure is generally stronger in settlements higher in the hierarchy. Whilst we acknowledge that the availability of land to some extent controls the location of development, significant growth in the lower tier settlements will require greater transport interventions than if the development could be located in settlements higher in the hierarchy. There are some locations where more housing than expected has been allocated in low tier settlements. This area may need additional public transport interventions to improve their accessibility. | The support for the settlement hierarchy and general approach to housing distribution is welcomed. The point made that housing growth in lower tier settlements will require greater transport interventions is precisely why the majority of housing was proposed for the main urban areas in the CSFED. The Publication Draft has further strengthened this principle by increasing the proportion of housing growth in the regional city and decreasing it in the lower tier settlements. |

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| | <p>6. Yorkshire Water suggests that the level of growth in many of these settlements will exceed the current capacity of Yorkshire Water's waste water network. This will require the phased release of sites to ensure co-ordination with the provision of infrastructure, in particular, waste water treatment capacity and the Aire Valley Trunk Sewer. There will need to be localised upgrades to the sewerage network, funded by developers</p> | <p>The comments are noted. The Council has consulted with a range of utility providers in the production of an Infrastructure Plan which will address the need for new investment in key areas such as waste water treatment capacity. The Core Strategy and Infrastructure plan will also inform the investment of partners in infrastructure in their programmes. Where critical, infrastructure may be an influence on the phasing and release of land for development.</p> |
| <p>2. Clarity and purpose of the policy.</p> | <p>1. Part A serves no purpose given that settlement targets are expressed in part B.</p> | <p>Part A is essential for the clarity of the Plan, one of the aims of which is provide a clear framework for the production of the DPD's for the settlements which will actually allocate sites.</p> |
| | <p>2. The objection is made only to a lack of clarity as to the delineation of the various sub areas within the Core Strategy and its maps.</p> | <p>The settlements and sub areas are illustrated in figure SS5 on page 57 of the document. However as part of the production of the publication draft the Council will look to see how the clarity of the plan can be improved including the explanation of sub areas.</p> |
| | <p>3. It is unclear how the housing growth has been apportioned to the sub areas and settlements</p> | <p>The CSFED document explains the approach to and evidence underpinning the settlement distribution in pages 33 to 39 which describes the spatial development option and also on pages 158-9.</p> |
| | <p>4. The HBF are concerned that the Council appears to be apportioning the housing</p> | <p>This comment is unclear. Having set the district wide housing target in Policy HO1. the plan within Policy HO3 then indicates how this</p> |

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| | <p>requirement between the different tiers and localities of the settlement hierarchy and setting separate targets for these areas. We are concerned that the Council is doing this in an attempt to establishing specific local targets, thereby avoiding the Council being assessed on a district wide basis in terms of meeting its overall housing requirement</p> | <p>target will be apportioned between each of the settlements and sub areas which in turn reflects the overall sustainable development principles of the plan including the settlement hierarchy and which reflects the evidence base in particular the available and developable land supply. This will hopefully offer certainty to both developers and local communities. It also allows for the scale of development required in each of the DPD's to be made clear - this is necessary since allocations will not be contained within one DPD but split between three. It will also assist with and give clarity to the preparation of Neighbourhood Plans. It is therefore unclear as to how the HBF come to the conclusion that this represents an attempt by the Council to 'avoid being assessed on a district wide basis in terms of meeting its overall housing requirement'.</p> |
| <p>3. General points and principles about housing distribution</p> | <p>1. A high priority should be given to development that enables people to live close to places of work, schools and other amenities, enabling travel by foot or bicycle and thus reducing reliance on car travel or overcrowding of public transport.</p> | <p>Agreed. The distribution of housing growth reflects this goal by focusing development on the regional city and principal towns. However the location of development also has to reflect other factors such as available and developable land supply. At a local and site specific level, allocations will be determined not in the Core Strategy but in the Local Plan. Policy HO7 and Policy SC 5 incorporating criteria designed to ensure that as far as possible development is located close to or accessible to services and employment.</p> |
| | <p>2. There is no reference within the background and justification to Policy HO3 to the need to reduce unsustainable out-</p> | <p>The Core Strategy is prepared on the basis of meeting its objectively assessed need in line with NPPF. Neither the district wide housing requirement nor the individual settlement targets have relied upon or</p> |

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| | <p>migration from the District as a whole and work with neighbouring authorities. This is particularly important given that co-operation between the authorities within the Leeds City Region is now a requirement via the Localism Act. In light of this there should therefore not be any reliance on exporting the housing requirement to neighbouring authorities without clear agreements and clear spatial planning justification. Information and evidence of co-operation between the Council's neighbouring authorities should be included within justification to Policy HO3.</p> | <p>been based upon 'exporting' Bradford's housing requirement to adjoining authorities. The Council actively works to discharge the 'Duty to cooperate' with adjoining LPAs through the Leeds City Region.</p> |
| | <p>3. Concern that too much emphasis is being put on the Allocations DPD for the delivery of much needed homes when this DPD will not be in place for several years and there is an immediate shortage of deliverable sites. In the absence of such a DPD the Core Strategy should include provision for a presumption in favour of sustainable development in line with Government Policy</p> | <p>The comments are noted. The Publication Draft Document has included such a policy within the core policies section.</p> |
| | <p>4. Targets should be expressed as minima - "Whilst the allocation for new housing in Denholme is supported and the number</p> | <p>The Council does not agree that the targets set for settlements such as Denholme should be expressed as minima. In general terms significant and uncontrolled growth in such villages would not be</p> |

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| | <p>allocated appears appropriate given the size of the village, the policy should make clear that the target set out is a minimum in accordance with earlier Policy PN1 (South Pennines Towns and Villages Sub Area).</p> | <p>sustainable. Land supply within the built up areas of the villages is extremely limited and therefore expressing targets as minima could have the effect of allowing excessive, unplanned development in sensitive locations on the edge of these villages and within the green belt. It would also inhibit the effective planning for infrastructure and services and could undermine the efforts to direct development to the main urban areas</p> |
| | <p>5. More focus should be afforded to development in the main urban area. 70% would be more appropriate</p> | <p>It is agreed that the focus for development should be the main urban area and in the CSFED we would argue that this was indeed the approach with around 61.5% within the Regional City of Bradford and a further 11% within Keighley.</p> |
| | <p>6. Object to intensification of further development in the urban area - few green areas remain</p> | <p>The potential loss of green areas due to intensification of development is a key issue. Concentrating development within the main urban areas is considered to be the most sustainable approach to meeting future need, however the Allocations DPD will also be assessing the network of green spaces within the urban area and seeking to ensure adequate provision. This may involve the loss of some green spaces particularly where they do not perform well in terms of their visual or amenity benefits but it will also mean investing in and improving other areas of greenspace and providing green space within new development schemes.</p> |
| | <p>7. Natural England recommends that the Policy is amended to: Identify areas where there is further need to assessment of the</p> | <p>The suggestion is noted and indeed to some extent the principles have played a part in the distribution for example in the avoidance of placing an undue focus of growth in areas affected by national or</p> |

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| | capacity of the environment to accommodate development level proposed; How capacity studies have steered it to less sensitive areas; Encourage action to increase, in appropriate ways the capacity of areas to accommodate development; Consider the use of environmental stock-taking techniques linked to indicators for change in landscapes, wildlife, habitats and geological features | international wildlife designations or areas of highest flood risk. However it is not considered that the precise approach advocated is the right one approach to strategic policy formation with regards to housing distribution. |
| | 8. Reduction and redistribution of new housing to match job creation more realistically. | This is a rather vaguely expressed comment which is therefore difficult to respond to. The overall housing target reflects the district wide need for housing. The distribution of new homes is concentrated on the major centres of Bradford, Shipley, and Keighley which is precisely where jobs and services are concentrated now and where future jobs growth will be most prevalent. |
| 4. The Target For Bradford as a Whole | 1. Support Bradford being the primary focus of development, including the Canal Rd area. This is a sustainable approach to addressing the requirements. | Support noted. |
| | 2. We are supportive of the broad distribution of housing within the Regional City sub area. | Support noted. |
| | 3. Supports the identification of Bradford as the prime focus for housing. | Support noted. |

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| | <p>4. Objection to the level of development and locations for development proposed in the areas covered by Thornton and Allerton wards. Concerns expressed relate to loss of green belt and green fields when there are both empty homes and derelict and brown field sites elsewhere capable of meeting the need for homes, lack of road infrastructure capacity, and already over subscribed services such as doctors and dentists.</p> | <p>The comments are noted however the Core Strategy does not set out specific targets for the wards mentioned. The configuration of sites will only be determined once the Allocations DPD has been produced. The targets for the wider Thornton village and Bradford SW and Bradford NW areas and the proposals for local green belt releases reflect the need to concentrate development within the Regional City which is both the area of greatest housing need and the most sustainable location in relation to jobs and services. The evidence base, in particular land supply shows that it will be impossible to meet these needs purely on brown field sites. The revised housing target in the Publication Draft already includes a substantial allowance for the reduction in vacant homes without which the target for the areas mentioned by the objector would be likely to be even higher. The issues relating to oversubscribed services and infrastructure and not valid reasons for reducing the housing targets firstly because these problems are not unique to the area mentioned and secondly because Bradford District is obliged to meet the need for new homes within the district. Services and infrastructure can and will need to be improved in all areas across the district and an Infrastructure Plan has been produced to address this issue. Finally it is only when there is more certainty over the future distribution of housing growth that significant progress can be made in planning for the required infrastructure and securing and bidding for the necessary resources to provide it.</p> |
| <p>5. Common issues raised for</p> | <p>1. Concerns raised in relation to potential loss</p> | <p>The Core Strategy does not allocate sites. The Allocations DPD will</p> |

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| different areas of the Regional City | of open areas, impact on canals, harm to local wildlife, noise and air pollution and congestion along Leeds Road. | assess all available site options and seek wherever possible to either avoid loss of open space and impacts on wildlife, or put forward mitigation measures. The Council understands the concerns that are raised with regards to the capacity of services and infrastructure, particularly road congestion and noise and air pollution. However these issues are not unique single areas such as Leeds Road and will be an issue more or less wherever the new homes are allocated. The district's population is growing and will continue to do so and therefore infrastructure and services will need investment and improvement across the district. The Council has produced an Infrastructure Plan to address these issues. Transport corridor studies will be produced as part of the Allocations DPD work and these studies will focus on those corridors where problems are most concentrated. The studies will identify measures which will help manage, mitigate or reduce such capacity and congestion. However the work on this and the investment needed cannot be progressed unless there is a degree of certainty over the distribution of growth across the district which the Core Strategy is attempting to provide. |
| 6. Bradford City Centre Target | 1. All new homes can be accommodated in the City Centre | Disagree. There is no evidence which suggests that all required homes could be accommodated in the city centre and indeed none is provided by the objector. |
| | 2. Make more focus of the City centre as an area for new homes etc and encourage development in old buildings and above shops | The Core Strategy is already proposing that the City Centre be a growth area and accommodate a large number of new homes. However any targets must be capable of being implemented and |

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| | | <p>relate to deliverable land supply. It is considered that the housing target for the city centre is ambitious but achievable and cannot be increased.</p> |
| | <p>3. Part A of the policy includes an allowance of 3,500 dwellings to be delivered from the Bradford City Centre Area AAP. These figures are substantially in excess of the capacity of the area suggested by the data in the SHLAA (2390). It is therefore unclear as to how the Council has arrived at the housing figures referred to in Policy HO3, which should be based on a sound and credible evidence.</p> | <p>It is acknowledged that the City Centre target lies above the level of deliverable supply identified in the first SHLAA. It is however considered a realistic and appropriate target for the following reasons. Firstly there are a number of sites, suitable for residential development, which have not been included in the SHLAA trajectory because the future delivery of these sites is currently unpredictable or uncertain. Some of these sites are judged likely to form part of the supply in the future. This is borne out by an increase in the capacity of the city centre within the SHLAA update. Furthermore new sites continue to come forward through the planning application process illustrating the existence of a considerable stock of buildings with potential for conversion and redevelopment. The SHLAA methodology adopts a density range for city centre sites which lies well below that being put forward in planning applications at the time of the SHLAA assessment. In this case therefore it could be argued that the potential of the currently identified city centre sites is considerably higher than the SHLAA suggests. Finally regeneration and investment in the city centre is a key priority for Council. The Council are preparing an Area Action Plan for the City Centre. Adopting a challenging target reflects the likely improved background that will exist for city centre investment in the second half of the plan period.</p> |

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| 7. Target For Shipley & Canal Road Corridor AAP | 1. Part A of the policy includes an allowance of 5,000 dwellings to be delivered from the Shipley and Canal Road AAP. These figures are substantially in excess of the capacity of these areas suggested by the data in the SHLAA (Shipley 1535 vs. target of 2000, Canal Rd 1192 vs. 3000 target). | The figure for the AAP area has now been reappraised in the light of both the updated SHLAA and the work carried out in the production of the AAP. The revised figures have been The Council will be reviewing the potential capacity of the Canal rd area as the work on the master plan for the area is progressed. |
| 8. Target Bradford NE | 1000 or more new homes in Idle is too many - capacity of roads, schools full etc | The Core Strategy does not set a specific target for Idle and the precise distribution of sites which will take into account a range of factors will be dealt with in the Allocations DPD. |
| 9. Target For Bradford SE | 1. Supports urban extension at Holme Wood with suggestion that more development can be accommodated there. | The support is noted. The target for the SE area and the urban extension is considered appropriate. |
| | 2. The Core Strategy has placed a disproportionate part of the housing target for the Regional City of Bradford on the community within the Parish of Tong and Holme Wood. Homes should be distributed more equitably throughout the district in a manner which does not follow the easy option of a large scale green belt release at the extreme boundary, but which rigorously examines the other options. | The Council's overall spatial strategy is explained within the document and is based around the settlement hierarchy set out in Policy SC4. The proportion of the district's housing target allocated to the regional city reflects its role and the need to direct most development to main urban centre where the needs for new housing are greatest and where service and employment opportunities are concentrated. The Council have already carried out extensive work in assessing and consulting on different options regarding housing targets and the distribution within the different sub areas of the regional city reflects this work. It also reflects the results of the SHLAA and the shortage of developable land. This in turn means |

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| | | that a significant contribution in meeting this need will need to come from the green belt not just in SE Bradford but also in other parts of the city and in other settlements across the district. |
| | 3. I believe a number of many of the settlements referred to are unable to accommodate the number of dwellings they have been allocated yet the South East of Bradford has a capacity far greater than its current allocation. | It is difficult to respond because the settlements are not specified nor the reasons why the objector feels there is insufficient capacity. As a general point the housing targets have been guided in part by the SHLAA. No targets have been set which are either significantly above the level of SHLAA capacity or where there is no prospect for additional capacity to be found. |
| 10. Target For The Principal Towns | 1. Support the proposed distribution - particularly for the Principal Towns. | Support noted. |
| | 2. The apportionment should rightly follow the settlement hierarchy but with recognition of service and infrastructure availability and potential. On this basis the Principle Towns of Keighley, Ilkley and Bingley could take a higher apportionment. | Disagree. While the Principal Towns should be a key focus for growth and development the targets proposed within the CSFED reflected the individual circumstances within each settlement with regard to both environmental constraints and available land supply. These targets have been reviewed in the light of updated evidence including the Habitats Regulations Assessment and the target allocated to the Principal Towns has actually had to be reduced largely because of the constraints affecting Ilkley. |
| 11. Target For Keighley | 1. We support the 5,000 dwelling apportionment to meet housing need and note the area has a relatively balanced housing market. We support the need to consider urban extensions to all suitable parts of the | Support noted. |

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| | Town. | |
| | 2. Development should focus on regenerating old and dilapidated buildings in the town centre rather than green fields and open areas should be protected as wildlife corridors/country park | The plan includes policies to ensure that the use of previously developed land is maximised but this has to be within the boundaries and constraints set by the amount of available, viable and deliverable brown field land. The evidence base unfortunately shows that the needs of the town cannot be met without a significant contribution from green field sites and also a contribution from green belt. |
| | 3. The Council questions whether building for which planning has been or might be passed prior to the adoption of the LDF, will be included in the number of houses required. | The Allocations DPD will assess all available site options to meet the Keighley target and sites which have been granted planning permission but which are yet to be implemented will be able to count towards the target as long as based on the evidence available at the time those sites are proven to be deliverable. The granting of planning permission does not in itself guarantee that a site is deliverable or is going to be implemented. |
| 12. The relative balance of housing between Bradford and Keighley | 1. The proposed proportion of housing for the regional city of Bradford (29,000 units) to 2028 is too high The proposed proportion of housing for the principal town of Keighley (5,000 dwelling units) is too low. The Bradford target is unrealistic because of inadequate infrastructure capacity and expected poor housing market conditions. | The Council disagrees both with the views expressed and the analysis and reasoning behind them. The figure for Bradford is realistic and is fully supported by the results of the SHLAA which have assessed potential sites and their deliverability. No evidence or justification is given by the objector as to how and why the 5000 target is claimed to not meet likely need in Keighley. The revised target for Keighley, even though slightly lower than in the CSFED, is still well in excess of the target which would result from a housing distribution based on the population of the town. The objector fails to |

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| | <p>The proportion of housing allocated to Keighley is also unrealistic and unfair. It is unrealistic because Keighley has some excellent redevelopment sites and the infrastructure capacity to develop them; there is also greater market demand for such redevelopment than may appear. It is unfair to allocate only 5,000 dwelling units to Keighley as this is insufficient for the need for housing in the area. Moreover, as Table SS1 shows, the RSS provides for 30% of all new housing development to come from the Principal Towns (including Keighley), whereas the Preferred Spatial Development Option in the draft Core Strategy provides for only 17% of new housing development to come from these towns.</p> | <p>indicate what is the correct figure for Keighley and why. Finally there was no RSS requirement to allocate a specified proportion - 30% or otherwise - to the Principal Towns. The RSS has also now been revoked.</p> |
| <p>13. Target For Bingley</p> | <p>1. Support for the creation of 1600 new homes in Bingley and for local green belt releases. The additional new housing will support the town and enable existing services and facilities to be maintained. It will encourage new businesses to locate in Bingley.</p> | <p>Support noted.</p> |

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| | <p>2. The Bingley area has already seen significant amounts of new development that has caused congestion and is changing the character of the area.</p> | <p>While the area has seen some development in recent years this does not mean that there is not a continuing need for new homes to meet the growing population of the district and that Bingley as a Principal Town is an appropriate location for a modest allocation of development to meet this need.</p> |
| | <p>3. Objection to Eldwick & Gilstead being identified as suitable for such a high percentage contribution to the 1600 Bingley allocation. The area has already suffered from extensive development following the RUDP. Objects to green belt, loss of open space, impact on landscape and biodiversity</p> | <p>The Core Strategy does not include any specified target for Eldwick and Gilstead. The objection appears to be based on the sites which have been assessed as part of the SHLAA. However the SHLAA is simply assessing the deliverability of potential sites. It is not proposing which sites should be allocated. This will only be addressed once work on the Allocations DPD commences.</p> |
| | <p>4. The areas around and including Saltaire Road and Lode Pit Lane contain fields that provide essential foraging habitat for wildlife that lives here. Without this habitat this wildlife will be lost forever. This includes families of badgers and roe deer, hares, several species of bats and birds, squirrels, voles and shrews. This area is also attractive and peaceful countryside that is well used and loved by local walkers, nature enthusiasts, dog walkers, horse riders and cyclists.</p> | <p>The Core Strategy does not in itself determine which sites will be developed. This will be determined in the Allocations DPD where designated wildlife sites and habitats will be a criteria which will be part of the site selection process.</p> |
| 14. Target For Ilkley | <p>1. Support for the target - Ilkley is an</p> | <p>Support noted.</p> |

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| | important Principal Town and requires new housing, including affordable housing, to support the economic prosperity of the community. Ilkley benefits from good public transport links and community facilities. The SHLAA has shown that there area number of suitable sites both in and on the edge of the settlement which can accommodate development. | |
| | 2. Support for the target and the provision of open space to address current deficiencies | Support noted. |
| | 3. Ilkley should be allocated an allowance of more than 1300 units (table SS5). The SHLAA has indicated that available housing land supply in Ilkley can accommodate number of dwellings greater than 1300. Ilkley benefits from good rail links / services to Bradford and Leeds, frequent bus services. Policy TR3 provides for improvement of the public transport interchange which will make Ilkley more accessible and sustainable. There is strong market demand in Ilkley for new homes. | Disagree. Having reviewed the updated evidence base and the habitats Regulations Assessment, the target for Ilkley has had to be significantly reduced rather than increased. |
| | 4. There should be a freeze on development | There is no justification for such a freeze and this would be contrary |

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| | until we see the results of the new Tesco store with regards to traffic, parking, and impacts on existing businesses.. | to the principles set down by the Government in there NPPF in particular the need to plan positively to meet the needs for new homes. |
| | 5. There is no evidence that Ilkley needs more housing. It is Bradford that needs housing. | Disagree that there is no demonstrable need for new homes within Ilkley. There is a clear need for new homes, particularly affordable housing in the area. Moreover Ilkley is a Principal Town and as such it should play a role in meeting the wider needs for new homes in the district. |
| | 6. It must be questioned if this is a proper and accurate estimate of need as opposed to a desire to live in Ilkley | The distribution of housing growth to meet the overall need within the district cannot be determined purely by looking at local need within each settlement. Other factors such as the availability of developable land supply, transport connectivity and access to jobs and services must be taken into account. The district's population is expanding rapidly and therefore all parts of the district will need to contribute to meeting the need for new homes. Targets are therefore policy and strategy led – they have been determined in relation to an overall spatial strategy for delivering new homes in a sustainable way reflecting environmental constraints, the need for regeneration, transport and connectivity and available land supply. |
| | 7. There are many brown field sites in Bradford and Keighley. | The SHLAA has assessed both green field sites and brown field sites across the district. There simply are not enough developable brown field sites to avoid some development in green field and green belt sites. |
| | 8. New homes in Ilkley will be bought by | There will always be a degree of movement across local authority |

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| | people moving from Leeds and will not therefore address Bradford's housing shortage. | boundaries. The Council cannot control who buys the homes which are built. A similar argument could be made about homes being built over the boundary in Leeds and being taken up by unfortunate people in Ilkley who cannot remain there due to the lack of provision of new homes in the area. |
| | 9. There are over 6000 empty properties in the district. | The district requirement for new homes in the Core Strategy has already been reduced by 3000 to allow for the reduction in empty homes. Without this allowance the district wide target and perhaps the Ilkley target would have had to be even higher. Policy HO10 outlines the importance of tackling empty homes and the Council has produced an empty homes strategy and has recently been commended as being one of the most successful in bringing such properties back into use. |
| | 10. The proposal represents the imposition of a top down target. Has the 1300 target still been imposed from above by the Office for National Statistics? | This is incorrect. It is a legitimate and essential function of the Local Plan to indicate the level and distribution of growth within the district as this will allow for the identification of land to meet the needs of the community and will give certainty to developers and residents. It will also form the framework within which the Council and or local neighbourhoods can formulate their plans. The target has not been determined by the ONS. |
| | 11. The target would conflict with Policy HO6 which requires that 40% of new development in Ilkley should be on previously developed land. At an average of 30 dwellings per | The target does not conflict with Policy HO6. Firstly policy HO6 sets a target of 40% for the Principal Towns as a whole and not specifically for Ilkley. This is something which has been made clearer in the supporting text in the Publication Draft document. |

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| | hectare that would require 17 hectares, and although it is claimed that there are opportunities for infill (WD1A) the SHLAA finds only 8.67 ha in Ilkley, including the 3.37 ha site of the Grammar School which is not currently developable. | Secondly it is too early to speculate which sites will need to be released - the SHLAA represents a land supply analysis at a snapshot in time and the range of site will be both expanded and updated. |
| | 12. A number of comments were received objecting to the proposed target due to potential impact on Ilkley Moor. | The comments are noted. There is clearly a need to ensure that the level of development proposed within and adjoining Ilkley does not have significant and irresolvable impacts on the Moor in particular on its internationally recognized wildlife habitats. In response to a range of evidence including the Habitats Regulations Assessment, the Publication Draft proposes a significant reduction in the target for Ilkley. |
| | 13. An additional impact on the Moor will be the impact on the landscape visible from the Moor resulting from the development of a number of the sites identified within the SHLAA. | The need to protect landscape and potential affects on views both of and from the Moor will be taken fully into account as part of work on the Allocations DPD. Landscape impact is one of the key principles for consideration within Policy HO7. The Core Strategy does not itself determine which sites are allocated. This will be for the Allocations DPD to address. |
| | 14. The SHLAA identifies sites for about 800 homes in Ilkley which to this Group seems a more realistic, sustainable and justified target | The comments are noted. |
| | 15. The latest targets require 31,000 less houses for England – has this been taken into | The housing requirement for the district and therefore the individual settlement targets have been updated in the light of the Housing |

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| | account? | Requirement Study produced by consultants GVA and Edge Analytics which in turn has taken account of the most up to date projections issued by the Government. |
| | 16. The SHLAA determines 1,300 new homes are required in Ilkley by 2028. | This is incorrect - the SHLAA itself does not itself set housing targets. It does however provide information on the scale and distribution of deliverable land and is therefore a key factor in setting the targets. |
| 15. Common issues raised for different areas of Principal Towns | 1. A number of objections have been received which relate to the impact of the proposed development on services and infrastructure and that the areas cannot accommodate new development. Concerns are expressed with regards to flooding, sewers, schools capacity, and capacity on the rail network, car parking capacity in Ilkley centre, and particular concerns regarding congestion on key road links including the A65. | <p>The Council understands the concerns that are raised with regards to the capacity of services and infrastructure, including public transport capacity, road congestion and schools capacity. However these issues are not unique to single areas such as Ilkley or Bingley and will be an issue more or less wherever the new homes are allocated.</p> <p>The district's population is growing and will continue to do so and therefore infrastructure and services will need investment and improvement across the district. The Council has produced an Infrastructure Plan to address these issues. It has consulted with utility providers as part of that work. The Infrastructure Plan indicates a number of challenges in accommodating future growth but does not indicate any major infrastructure issues which are not capable of resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.</p> <p>In the early stages of work on the Core Strategy the Council</p> |

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| | | <p>commissioned a Transport Study. Although looking at the district at a strategic level, it did confirm that there was no option for distributing development across the district which performed significantly better others and that wherever housing growth was distributed there would be issues with regards to increased traffic flows and increased pressure on certain key areas, junctions and corridors. The study recommended that further more detailed corridor based studies were undertaken once there was more certainty over the proposed strategy for housing. Corridor based studies will therefore be produced as part of the work on the Allocations DPD and these will be focused on the areas of greatest concern. The studies will identify measures which will help manage, mitigate or reduce such capacity and congestion</p> <p>As part of its statutory duties the Council's Education Service will continue to plan for future educational service needs and the Council's new statutory development plan, by providing more certainty over the levels of growth planned in each area, will actually assist it in both the planning process and its ability to bid for funding.</p> |
| | <p>2. Objections relating to the loss of green spaces.</p> | <p>The Core Strategy does not allocate sites. The Allocations DPD will assess all available site options and seek wherever possible to either avoid loss of open space and impacts on wildlife, or put forward mitigation measures. While this may involve the loss of some green spaces, particularly where they do not perform well in terms of their visual or amenity benefits, it will also mean investing in</p> |

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| | | and improving other areas of green space and providing additional green space within new development schemes. |
| | 3. Objections to the loss of green belt. | <p>The concerns regarding the potential loss of green belt land are acknowledged and understood. However the NPPF makes it clear that it is perfectly acceptable for Local Plans to contain proposals for the use of green belt land to meet future development needs where there are exceptional circumstances which justify it. There are clearly such exceptional circumstances within Bradford. The district needs to make provision for a very large number of new homes over the plan period and the available and deliverable land supply is insufficient to meet this need in non green belt locations. Having established that there is a need for green belt deletions it is important that deletions are focused where possible in the most sustainable locations and in reasonable proximity to the areas of greatest need. The most sustainable locations are the Regional City of Bradford and the Principal Towns Of Keighley, Ilkley and Bingley. The Council's Growth Study has examined all settlements across the district and has shown that there are plenty of areas of land where development could be accommodated if needed in relatively sustainable locations that would not significantly undermine the role and function of the green belt. It is however a task for the Allocations DPD, not the Core Strategy, to determine the precise selection of sites and local green belt changes best placed to meet need, and this process will involve full consultation with local communities.</p> |
| | 4. Concerns over the impact on the character | The Council understands the concerns raised with regards to the |

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| | of the area, on landscape and wildlife. | impact of development on local character and on landscape and wildlife. In many cases it is suggested that the careful selection of sites and sympathetic and high quality design can avoid or mitigate such impacts. In the case of the Principal Towns, the targets for Ilkley, Bingley and Keighley have all been reduced in the Publication Draft document as compared to the CSFED. In the case of Ilkley the target has been significantly reduced in part as a result of the evidence of potential; impacts on wildlife habitats in the adjoining South Pennine Moors SPA. |
| 16. The Level of Development Proposed In Wharfedale | 1. A number of objections have been received to the overall level of development assigned to Wharfedale citing the impacts on the area, lack of services and infrastructure, congestion in the A65 corridor. | Responses to these issues in general terms are outlined above. The concerns are noted and in response to a range of evidence the number of new homes assigned to Wharfedale has been very significantly cut from 3100 in the CSFED to just 1600 in the Publication Draft. |
| 17. Target For the Local Growth Centres | 1. Support the proposed distribution - particularly for the Local Growth Centres | Support noted. |
| 18. Target for Menston | 1. Concern over the level of housing development proposed within Menston associated with the policy that Menston should be identified as a 'Growth Centre' - it should remain a village. | As a result of the updated evidence base and in particular the conclusions of the Habitats Regulations Assessment the proposed target for housing development in Menston has been significantly reduced from 900 to just 400 over the period to 2030. Menston has also lost its 'Local Growth Centre' status and been downgraded to a Local Service Centre. The proposed target for Menston also now means that no changes to the green belt will be required over the plan period to meet the 400 home target. |

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| | <p>2. Objection to the level of new housing proposed in Menston - 900 homes would represent a very significant 35% increase in housing and this is in addition to the other developments in the Leeds area such as at High Royds.</p> | <p>See the response outlined above.</p> |
| | <p>3. There are few employment opportunities in Menston and the locations which people travel to go to work are often not accessible by bus.</p> | <p>While employment opportunities within the strict confines of the village itself may be limited, there are a wide range of employment centres accessible to the village via its excellent links to the strategic road and rail network. However due the factors outlined in the responses above the housing target for the village has been reduced from 900 to just 400 over the plan period to 2030.</p> |
| <p>19. Target For Burley In Wharfedale</p> | <p>1. Supports the target for Burley in Wharfedale - it is an appropriate location for new development and benefits from good public transport links and community facilities. There are a number of suitable sites identified in the SHLAA to meet this target.</p> | <p>Support noted.</p> |
| | <p>2. Challenge and object to the requirement for 500 new houses in Burley - the case for this level of development has not been made. Housing growth should not only be based on regional and district requirements but also on local needs</p> | <p>The distribution of housing growth to meet the overall need within the district cannot be determined purely by looking at local need within each settlement. Other factors such as the availability of developable land supply, transport connectivity and access to jobs and services must be taken into account. The district's population is expanding rapidly and therefore all parts of the district will need to</p> |

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| | | contribute to meeting the need for new homes. Targets are therefore policy and strategy led – they have been determined in relation to an overall spatial strategy for delivering new homes in a sustainable way reflecting environmental constraints, the need for regeneration, transport and connectivity and available land supply. Having said that the updated evidence base and in particular the results of the Habitats Regulations Assessment have resulted in the target for Burley In Wharfedale to being cut from 500 to just 200 new homes over the plan period to 2030. |
| | 3. Challenge and object to the requirement for 500 new houses in Burley - the current document provides no allowance for commercial development in Burley | If there is a need for commercial development in the area this can be met as part of the production of the Allocation DPD. The housing target for Burley has been cut to just 200 dwellings in the Publication Draft document. |
| | 4. Challenge and object to the requirement for 500 new houses in Burley - there is a very particular concern about the potential joining together of Burley and Menston, currently two separate and discrete communities. Should BU/002 and ME/007 be developed this would join the two communities creating a suburban sprawl. | The Core Strategy contains no such proposals for the merging of these settlements. The objector is referring to sites within the SHLAA which is not a policy document and does not form part of the development plan. Moreover the housing targets for Menston and Burley have been significantly reduced in the Publication Draft document. Most of the identified SHLAA sites within the green belt would not be required to meet the new targets. |
| | 5. We believe that any dwellings built on 'windfall' sites should be counted towards the number that is eventually agreed to be | This would not be appropriate. The whole point of Policy HO3 is to give certainty to plan making at the local level and to ensure that the correct number of new homes is planned for and provided. However |

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| | appropriate for Burley. | any sites with planning permission which are yet to be implemented when the Allocations DPD is produced and which are considered viable and deliverable will be able to count to the finalised target. |
| 20. The target for Queensbury | 1. Support for the Queensbury Housing Target of 1500 new dwellings - Queensbury is an attractive and vibrant place to live, work and invest and lies in a sustainable location on a key public transport corridor. | Support noted. |
| | 2. Policy HO3 supports Table SS7 which recognises that Queensbury Local Growth Centre is able to provide 1500 new homes up to 2030. Queensbury has good bus and road connections to employment, shopping and leisure attractions within the Principal Town of Halifax and the City of Bradford. As one of the most accessible and sustainable local centres located along key public transport corridors, Queensbury should be a focus for local housing, employment and supporting community facilities. Therefore the amount of new homes proposed within the Queensbury Local Growth Centre by Policy HO3 is supported. | Support noted. |
| | 3. Note: objections were received to the | See responses below. |

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| | <p>proposed level of growth in Queensbury in relation to schools capacity, road congestion and green belt loss. These matters are common to responses for all of the Local Growth Centres and are therefore addressed below.</p> | |
| 21. The target for Thornton | <p>1. Note : objections were received to the proposed level of growth in Thornton in relation to schools capacity, GP services, road congestion along Thornton Rd and green belt loss. These matters are common to responses for all of the Local Growth Centres and are therefore addressed below.</p> | See responses below. |
| 22. The target for Silsden | <p>1. In recognition of Silsden's role as a key Local Growth Centre, support is offered to the level of housing requirement specified for this location under Policy H03 and Silsden's position as the focus for the greatest level of growth of all Local Growth Centres.</p> | Support noted. |
| | <p>2. Silsden is one of several locations identified as Local Growth Centres. However Silsden has been identified for a much greater increase in homes - 56% compared to the average of 37%.</p> | <p>The Core Strategy suggests varying levels of housing development within the different local growth centres and this reflects the different circumstances in each case, in particular available land supply. In Silsden's case there are substantial tracts of developable land which have already been identified as safeguarded land for development in</p> |

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| | | the longer term in the RUDP. Notwithstanding the above the target for Silsden within the Publication Draft has been significantly reduced from 1700 to just 1000 over the plan period to 2030 in the light of the updated evidence base and in particular the results of the Habitats Regulations Assessment. |
| | 3. The SHMA suggests that there is no evidence of substantial need in the area. | The SHMA does not include a full assessment of need down to a local level for the whole plan period and what sub area break downs and data which are included in the SHMA relate solely to affordable housing need. Moreover the Core Strategy does not attempt to estimate and then allocate house building targets based on local need alone as this would ignore the much wider range of issues that need to be considered in deriving the best distribution in particular the availability of deliverable and viable land. |
| | 4. Providing homes in Silsden will be in the wrong place and will do little to cater for the main need which is in Bradford. | Providing new homes within Silsden has the potential to provide low cost affordable housing in the area which the Town Council admits is needed. It should also be noted that the target for Silsden within the Publication Draft has been significantly reduced and the majority of development is indeed focused within and adjoining the Regional City of Bradford. 69% of the district wide need for homes is assigned to the Regional City compared to just 2.4% in Silsden. |
| | 5. The proposed bypass will add noise and detract from the feel of Silsden as a quiet town- topography unsuitable | The sub area policy for Airedale has been amended to refer to need for transport infrastructure investment linked to new development in order to mitigate any impacts. |

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| | <p>6. Development in the area would not be sustainable and would encourage greater car journeys / commuting.</p> | <p>We would argue that the overall net effect of the Core Strategy is to concentrate development in the major centres in locations close to employment, services and public transport thereby minimising as far as is possible any increase in car journeys. However given the extremely high level of population growth which is projected within the district it is inevitable that there will be increased use of both the private and public transport networks. The need for consequent improvements to the network and the measures that will secure the best distribution of traffic via sustainable non car modes will be addressed in the Infrastructure Plan, and in Transport Corridor Studies that will be produced as part of the work on the Allocations DPD.</p> |
| <p>23. Target for Steeton With Eastburn</p> | <p>1. Supports the target for Steeton - the settlement is an appropriate location for new development and benefits from good public transport links and has a number of community facilities meaning the impact of any new development on existing infrastructure will be minimal.</p> | <p>Support noted.</p> |
| | <p>2. We suggest that in order to plan for a more sustainable and cohesive community with better local employment opportunities and to benefit from a reduced burden on the transport infrastructure, SwithE should be allocated substantially fewer new houses.</p> | <p>The comments are noted however no indication is given as to how many houses the objector thinks could be accommodated. The villages contains a range of local employment opportunities and services albeit at a far smaller scale than of larger centres elsewhere in the district and this is why it has been assigned a reasonably low target relative to the settlements in the higher tiers of</p> |

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| | | the settlement hierarchy. |
| | 3. We can find no explicit calculation from which is derived the suggested allocation to SwithE of 800 dwellings. It appears that the number allocated is the result of summing the area of ALL the flat, developable land in the parish and then multiplying by the preferred units per hectare = 800 houses. | The housing targets for each area were not and should not be determined via a statistical formula / calculation. Targets are policy and strategy led and based on a range of evidence – they have been determined in relation to an overall spatial strategy for delivering new homes in a sustainable way reflecting environmental constraints, the need for regeneration, transport and connectivity and available land supply. |
| | 4. There is no local need for the proposed number of houses. In order to establish a Parish Plan, the council carried out a parish-wide survey of all households in 2007. This included a housing needs survey, and this established that SwithE requires 19 new houses, 4 new apartments, 2 bungalows and 2 retirement dwellings – a total of 27 new dwellings | The figures are unlikely to reflect the full scale of both market and affordable housing need. In any case, the distribution of housing growth to meet the overall need within the district cannot be determined purely by looking at local need within each settlement. Other factors such as the availability of developable land supply, transport connectivity and access to jobs and services must be taken into account. The district's population is expanding rapidly and therefore all parts of the district will need to contribute to meeting the need for new homes. Targets are therefore policy and strategy led – they have been determined in relation to an overall spatial strategy for delivering new homes in a sustainable way reflecting environmental constraints, the need for regeneration, transport and connectivity and available land supply. |
| | 5. If the LDF allocates us 800 new dwellings then SwithE will be left with no suitable land to either expand our local employment | It is agreed that in areas such as Steeton there will also be a need to provide for development required for employment, schools and other facilities and this will be addressed within the Allocations DPD |

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| | opportunities or to build any additional school facilities. The provision of both local employment and local education are eminently sustainable aspirations – reducing the burden on the transport infrastructure and helping to develop a cohesive community. | |
| | 6. SwithE currently enjoys being a green rural parish. | The comment is noted. It is not considered that the Core Strategy proposals for Steeton need affect this particularly given sensitively designed and located development of a high quality. |
| | 7. Recent new housing has already harmed the character of the area and caused over development - no need for further homes | The comments are noted but not agreed with. |
| 24. Common issues raised for different Local Growth Centres. | 1. A number of objections have been received which relate to the impact of the proposed development on services and infrastructure and that the areas cannot accommodate new development. Concerns are expressed with regards to flooding and drainage, sewers, schools capacity, lack of health services, capacity on the rail network, car parking capacity in Menston centre, and particular concerns regarding congestion on key road links including the A65. | <p>The Council understands the concerns that are raised with regards to the capacity of services and infrastructure, including public transport capacity, road congestion and schools capacity. However these issues are not unique to single areas such as Menston, Burley, Queensbury, Steeton, Silsden and Thornton – they will be an issue more or less wherever the new homes are allocated.</p> <p>The district's population is growing and will continue to do so and therefore infrastructure and services will need investment and improvement across the district. The Council has produced an Infrastructure Plan to address these issues. It has consulted with utility providers as part of that work. The Infrastructure Plan indicates a number of challenges in accommodating future growth</p> |

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| | | <p>but does not indicate any major infrastructure issues which are not capable of resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.</p> <p>In the early stages of work on the Core Strategy the Council commissioned a Transport Study. Although looking at the district at a strategic level, it did confirm that there was no option for distributing development across the district which performed significantly better others and that wherever housing growth was distributed there would be issues with regards to increased traffic flows and increased pressure on certain key areas, junctions and corridors. The study recommended that further more detailed corridor based studies were undertaken once there was more certainty over the proposed strategy for housing. Corridor based studies will therefore be produced as part of the work on the Allocations DPD and these will be focused on the areas of greatest concern. The studies will identify measures which will help manage, mitigate or reduce such capacity and congestion</p> <p>As part of its statutory duties the Council's Education Service will continue to plan for future educational service needs and the Council's new statutory development plan, by providing more certainty over the levels of growth planned in each area, will actually assist it is both the planning process and its ability to bid for funding.</p> <p>Notwithstanding the above comments the overall level of</p> |
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| | | development proposed within the six settlements has been significantly reduced in the Publication Draft. |
| | 2. Objections relating to the loss of green spaces. | The Core Strategy does not allocate sites. The Allocations DPD will assess all available site options and seek wherever possible to either avoid loss of open space and impacts on wildlife, or put forward mitigation measures. While this may involve the loss of some green spaces, particularly where they do not perform well in terms of their visual or amenity benefits, it will also mean investing in and improving other areas of greenspace and providing additional green space within new development schemes. |
| | 3. Objections to the loss of green belt. | The concerns regarding the potential loss of green belt land are acknowledged and understood. However the NPPF makes it clear that it is perfectly acceptable for Local Plans to contain proposals for the use of green belt land to meet future development needs where there are exceptional circumstances which justify it. There are clearly such exceptional circumstances within the district. The district needs to make provision for a very large number of new homes over the plan period and the available and deliverable land supply is insufficient to meet this need in non green belt locations. Having established that there is a need for green belt deletions it is important that deletions are focused where possible in the most sustainable locations and in reasonable proximity to the areas of greatest need. The most sustainable locations are the Regional City of Bradford and the Principal Towns Of Keighley, Ilkley and Bingley. These areas will see the majority of green belt releases to meet |

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| | | <p>development needs.</p> <p>As a result of the reduction in housing targets for most of these settlements within the Publication Draft document (down from 6100 homes in total to just 4000 homes) it is envisaged that the amount of green belt release required will be much reduced in these areas with no green belt releases required to meet the targets in Menston and Silsden.</p> |
| | <p>4. Concerns over the impact on the character of the settlements, on landscape and wildlife.</p> | <p>The Council understands the concerns raised with regards to the impact of development on local character and on landscape and wildlife. In many cases it is suggested that the careful selection of sites and sympathetic and high quality design can avoid or mitigate such impacts. In the light of the updated evidence base and in particular the Habitats Regulations Assessment, the Publication Draft document has significantly reduced the housing targets in those settlements located close to the South Pennine Moors SPA -0 namely Menston, Burley and Silsden. The target for Queensbury has also been reduced to reflect the need to avoid impacts on landscape and setting.</p> |
| <p>25. The apportionment to the Local Service Centres</p> | <p>1. Objects to the apportionment of only 7.5% of the overall dwelling requirement to Local Service Centres. This number should be higher giving a more dispersed development strategy. Local Service Centres play an important role in offering services to their communities and the wider rural area and it is</p> | <p>The objector does not specify what an appropriate apportionment to the local service Centres would be. Local Service Centres are the fourth and lowermost tier of the settlement hierarchy and in general terms it is not considered that it would be sustainable to allocate significant levels of housing growth to these settlements.</p> |

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| | important that the overall level of growth proposed within them does not act as a constraint to development. | |
| 26. Target for Addingham | 1. Support for the target of 400 dwellings as being appropriate given its position in the settlement hierarchy, meeting housing need and demand, and capacity to accommodate development re infrastructure. | Support noted. |
| | 2. We support the proposed delivery of 400 dwellings in Addingham over the Core Strategy period to 2028. It is founded on a robust and credible evidence base with regard to the contents of the SHLAA and SHMA, and is the most appropriate strategy when considered against reasonable alternatives. In this way it accords with national planning guidance. | Support noted. |
| | 3. The proposed delivery of 400 dwellings will contribute to the sustainability of the settlement - growth will help to support local small businesses in the village and could encourage other start-up businesses, promoting both economic and social sustainability; | Support noted. |

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| | <p>4. The proposed delivery of 400 dwellings will contribute to the sustainability of the settlement – new housing development will also help to deliver affordable homes in Addingham, which has high house prices that are a contributing factor to out-migration of young people as qualified above, therefore contributing to social sustainability;</p> | <p>Support noted.</p> |
| | <p>5. Sensitively designed new development on the edge of Addingham, using local materials and vernacular building techniques, will improve the built environment by reinforcing the character and of the village.</p> | <p>Support noted.</p> |
| | <p>6. Support for the Addingham apportionment of 400 dwellings. Addingham is a larger and better established village than a number of others in the 4th tier of the settlement hierarchy and it has a good range of services and facilities.</p> | <p>Support noted.</p> |
| | <p>7. Objection on the basis that Addingham has a good range of businesses and services, should be identified as a Local growth Centre, and should therefore be allocated a higher housing target.</p> | <p>Disagree. Addingham has only a modest range of services and employment opportunities and lies at the periphery of the district. It would not therefore be sustainable to identify it as Local Growth Centre.</p> |

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| | 8. I strongly object to any house building (private or otherwise) in Addingham and all the local trouble that it would bring to the area. | Rather than bringing (unspecified) trouble, a modest amount of new development in the village would provide affordable homes and support local community services. |
| | 9. The scale of the proposals are out of proportion to the size of the village. | The Publication Draft has reduced the housing target for Addingham to just 200 dwellings which represents just 0.5% of the district target. At April 2013 Council tax data suggests the housing stock within the village to be approximately 1531. The proposed 200 dwellings would add just 13% to the stock and would be applied to a 15 year period to 2030. This can hardly therefore be described as out of proportion to the size of the village. |
| | 10. Lack of parking in village for parents collecting from school, commuters using Ilkley railway station and visitors | These are detailed matters which can be addressed within the Allocations DPD. |
| | 11. There is need for a small number of affordable housing units for local people, but no local demand for large developments. Development should only be to provide for local need. | The distribution of housing growth to meet the overall need within the district cannot be determined purely by looking at local need within each settlement. Other factors such as the availability of developable land supply, transport connectivity and access to jobs and services must be taken into account. The district's population is expanding rapidly and therefore all parts of the district will need to contribute to meeting the need for new homes. Targets are therefore policy and strategy. That said the revised target of just 200 dwellings over the period to 2030 will we suggest be catering for local need. |
| | 12. Much of the proposed housing is to be sited in fields with public footpaths. This is | The Core Strategy is not proposing which sites are allocated - this will be a matter for the Allocations DPD. |

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| | supposed to be an area for recreation so where will people be walking. | |
| | 13. The proposal will create more journeys to work. This would be contrary to Policy TR1. There is little employment in the village. | The revised and reduced housing target for Addingham represents very low levels of development both in absolute terms and compared to that proposed within the larger towns and within Bradford itself. The overall balance of development has been determined to focus as much development as possible close to or accessible to employment and services thus reducing the need for travel by car. However not all development can be placed in the larger urban centres. The overall effect of the proposed target for Addingham on travel to work is likely to be insignificant. |
| | 14. There is little demand to move from Bradford and Keighley to Addingham. The proposed housing development of 400 houses will not solve demand across the Bradford District but is likely to attract people from the "Golden Triangle" area of North Leeds/York/Otley. | There is inevitably a degree of overlap in housing markets across Local Authority boundaries and just as some of the new homes being built in Bradford may be taken up by those in adjoining areas, so development in adjoining areas will be available to those in need of homes within Bradford. |
| | 15. Very high Housing Costs. | High housing costs actually illustrate the need for an increased supply of new homes, in particular affordable houses. |
| | 16. Several areas in Addingham are registered as being of archaeological importance. Any building in such areas would have to be after an archaeological survey had | The Core Strategy is not allocating any sites- this will be a matter for the Allocations DPD where these matters will be considered and site selected to avoid impact on areas of archaeological interest. |

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| | taken place | |
| 27. Target for Baildon | 1. Although Baildon Parish Council would look for some reduction in the number of new homes planned, we accept that Baildon must bear its share of the required housing for the burgeoning population in the District. | The comments are noted and welcomed. The housing target for Baildon has been slightly reduced in the Publication Draft from 550 to 450 in the light of the updated evidence base. |
| 28. Target for Cottingley | 1. There are many unsold houses in Cottingley. There is no need for more houses. | The pattern of properties for sale reflects current housing market conditions and does not mean that there is not a considerable need for new homes in the district. |
| 29. Target for Cullingworth | 1. Objects to the allocation of only 200 dwellings to Cullingworth which is too low. The Settlement Study Update demonstrates that settlement's sustainability compares well with other Local Service Centres. It has been allocated less than other settlements of similar size such as Denholme and less than other settlements with fewer facilities. | Cullingworth possesses a range of local services and although rightly placed in the fourth tier of the settlement hierarchy it is a suitable location for a modest level of housing growth. In line with the updated evidence base it is considered appropriate to increase the housing target for the village to 350 dwellings. |
| | 2. Cullingworth's dwelling requirement should be increased to 420 dwelling - SHLAA non green belt capacity of 120 plus 306 which is the capacity of our clients Mannywells site. - thus making efficient use of previously developed land. | See the response above. |

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| | 3. New development would also support local services enhancing the sustainability of the settlement. | Agreed as long as the level of new housing growth is modest in scale. |
| | 4. The Core Strategy does not recognise the diversity of individual communities – each community is likely to have differing demographic trends | The Council has appraised each settlement within the Settlement Study which has provided a background for the formulation of the overall spatial strategy. The Council's approach has not been to carry out separate demographic projections for each community. |
| | 5. There doesn't seem to be any formula applied in justifying the housing figures. Is the proposed number of additional houses a true reflection of the need in the village. | The housing targets for each area were not and should not be determined via a statistical formula / calculation. Targets are policy and strategy led and based on a range of evidence – they have been determined in relation to an overall spatial strategy for delivering new homes in a sustainable way reflecting environmental constraints, the need for regeneration, transport and connectivity and available land supply. |
| 30. Target for Denholme | 1. Denholme target - the target is supported and appears appropriate given the size of the village. | Support noted |
| | 2. Allotments should be viewed as Green Belt and not built on. | The Core Strategy does not allocate sites for development and does not contain any proposals for development on allotments. The policy suggested by the objector would not be appropriate as allotments and green belt are two totally different designations with totally different aims and different national planning policy relating to them. |
| 31. Target for Haworth | 1. Concern over the scale of development and | There is no reason why the two stated objectives of meeting the |

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| | its impact on the character and setting of the settlement. Support for some limited and sensitive development on brown field sites. | need for a modest number of new homes, which has been reduced from 600 to just 500 in the Publication Draft document, over a very extended period and the protection of the character of the area cannot be reconciled. |
| | 2. On one hand the DPD mentions retaining the natural landscape, developing tourism and reducing traffic congestion and on the other, proposing to make Haworth a dormitory for Keighley, Bradford and or Leeds Which is it to be? The proposals are diametrically opposed and do not make sense. | There is no conflict and there is no policy in the Core Strategy to turn Haworth into a dormitory town for Leeds or Bradford although the settlements close proximity to Keighley will inevitably mean that some people who live in Haworth will travel the short distance to Keighley for work.. |
| | 3. Limited local employment in Haworth meaning people would leave the village. | Haworth possesses a range of local shops, services , small businesses and tourism facilities providing employment but of course nothing on the scale of larger towns such as Keighley and that is precisely why Haworth has been assigned a relatively small housing target. |
| 32. Target for Oakworth | 1. We express doubt that Keighley will be able to deliver 5,000 dwellings over the plan period and therefore consider it would be logical for additional development to take place in Oakworth given its relationship with Keighley. | The Council considers that the proposed target for Keighley as revised slightly in the Publication draft document is realistic and that the target for Oakworth is appropriate given its size, location and local amenities. |
| 33. Target for Oxenhope | 1. The allocation of 150 houses in Oxenhope and 600 in Haworth is contrary to policies SC1 .6, SC3.3, SC3.9, SC5, and SC6 all of which | The allocation of new homes to Oxenhope is an extremely small one and has been reduced further in the Publication Draft document to just 100 dwellings over approximately 17 years to 2030. It is difficult |

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| | refer to the need to protect and enhance the area and create a balance between settlements and the South Pennine landscape | to see how or why the specified impacts would arise particularly given sensitively and well designed schemes which reflect the local area at the planning application stage. |
| | 2. The allocation of 150 houses in Oxenhope and 600 in Haworth will significantly alter the character of the existing historical built environment including conservation areas. In addition there will be a significant impact on the surrounding countryside and as a consequence affect the major industry of tourism | See comments above. |
| | 3. Doubling of size of village? | This is not correct. Council tax data suggest that the village contained approximately 825 homes at April 2013. The allocation of a reduced target of just 100 dwellings over 17 years to 2030 would not remotely involve doubling the size of the village. |
| | 4. No local employment | The relative lack of employment facilities within the village is precisely why such a very small housing target has been proposed for the village. |
| | 5. Oxenhope is the only Local Service Centre not to be added to the Bradford District Retail and Leisure Survey hierarchy which is committed to strengthening village centres as a focus for the community. Given this omission and the infrastructure at capacity the | The village has not been allocated a large housing target. |

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| | village is not able to sustain further house building of any numbers. This has been recognised in the past by Inspectors dealing with planning appeals. | |
| 34. Target for Wilsden | 1. Wilsden has no need or demand for an additional 300 houses | The distribution of housing growth to meet the overall need within the district cannot be determined purely by looking at local need within each settlement. Other factors such as the availability of developable land supply, transport connectivity and access to jobs and services must be taken into account. The district's population is expanding rapidly and therefore all parts of the district will need to contribute to meeting the need for new homes. The assertion that Wilsden has ' <u>no need</u> ' for any new housing is questionable. The publication draft document has reduced the housing target for Wilsden from 300 to just 200 homes over the period to 2030. |
| | 2. No need for extra houses - there are many houses for sale, to rent or unfinished in the village. Some sites given planning permission still remain undeveloped. | The pattern of properties for sale reflects current housing market conditions and does not mean that there is not a massive need for new homes in the district over the next 15 years. |
| | 3. Identity and character of Wilsden will be lost by building on greenfield sites and potential merging of Wilsden with Harden and Allerton. | There is no reason why this should be the case given the modest and now reduced scale of development proposed and given appropriate selection of sites and sensitive design of new development. The Core Strategy does not allocate any sites - this is a matter for the Allocations DPD. There are no proposals within the Core Strategy for the merging of Wilsden with other settlements. |

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| | 4. Community cohesion will be badly affected by such a large increase in population and make areas more unsafe. | The Core Strategy is not proposing a large increase in the village's population and it is not clear why the alleged effects on community cohesion should occur. Community cohesion could equally be undermined by not providing enough new housing for example if families are separated as result of a lack of affordable homes for residents particularly those seeking their first home to rent or buy. |
| | 5. Wilsden is a commuter village. Jobs needed where people live. | The relatively small number of jobs within the immediate locality is precisely one of the reasons why Wilsden has been assigned a small housing target, and why its target has been reduced still further in the Publication Draft document from 300 to just 200 dwellings. |
| | 6. Infrastructure levy will not raise enough for improvements | This is speculation as the Council has yet to publish its proposals for a Community Infrastructure Levy / charging scheme. Moreover the CIL would never be expected to pay for all of the necessary improvement which might be needed within an area as a result of new development. |
| | 7. Infilling within the settlement should take priority over settlement extensions | Policy SC5 already includes a requirement that deliverable options for infilling are used before extensions to settlements are considered. However the reality is that there is insufficient deliverable land supply in infill locations alone to meet the districts housing needs. |
| | 8. Wilsden can continue to grow in a regular and sustainable fashion as small sites within the village and 'windfall' sites become | The revised plan is only proposing a housing target of 200 dwellings spread over 17 years to 2030 and this is suggested to be the sort of modest and sustainable growth to which the objector refers. The |

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| | <p>available. The projected rise in population is expected to peak in 40 years time and then decline. We must be careful to safeguard our countryside now both for food and quality of life because future generations will depend on the decisions which we make today.</p> | <p>provision of small sites and windfall sites will make an important contribution but will not be remotely sufficient on their own to meet the district's housing needs.</p> |
| <p>35. Common issues raised for different Local Service Centres of Addingham, Baildon, Cottingley, Cullingworth, Denholme, Haworth, Oakworth, Oxenhope and Wilsden.</p> | <p>1. A number of objections have been received which relate to the impact of the proposed development on services and infrastructure within the Local Service Centres and suggesting that the villages cannot accommodate new development. Concerns are expressed with regards to flooding, schools capacity, and lack of health services, poor public transport services, and particular concerns regarding congestion on key road links including the A65.</p> | <p>The Council understands the concerns that are raised with regards to the capacity of services and infrastructure, including public transport capacity, road congestion and schools capacity. However these issues are not unique to any one village or area – they will be an issue more or less wherever the new homes are allocated.</p> <p>The district's population is growing and will continue to do so and therefore infrastructure and services will need investment and improvement across the district. The Council has produced an Infrastructure Plan to address these issues. It has consulted with utility providers as part of that work. The Infrastructure Plan indicates a number of challenges in accommodating future growth but does not indicate any major infrastructure issues which are not capable of resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.</p> <p>In the early stages of work on the Core Strategy the Council commissioned a Transport Study. Although looking at the district at a strategic level, it did confirm that there was no option for distributing development across the district which performed</p> |

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| | | <p>significantly better others and that wherever housing growth was distributed there would be issues with regards to increased traffic flows and increased pressure on certain key areas, junctions and corridors. The study recommended that further more detailed corridor based studies were undertaken once there was more certainty over the proposed strategy for housing. Corridor based studies will therefore be produced as part of the work on the Allocations DPD and these will be focused on the areas of greatest concern. The studies will identify measures which will help manage, mitigate or reduce such capacity and congestion</p> <p>As part of its statutory duties the Council's Education Service will continue to plan for future educational service needs and the Council's new statutory development plan, by providing more certainty over the levels of growth planned in each area, will actually assist it is both the planning process and its ability to bid for funding.</p> <p>Notwithstanding the above comments the targets for most of these villages have been reduced in the Publication Draft in line with the overall approach to focus most growth within the main urban areas of the district.</p> |
| | <p>2. Objections relating to the loss of green spaces.</p> | <p>The Core Strategy does not allocate sites. The Allocations DPD will assess all available site options and seek wherever possible to either avoid loss of open space and impacts on wildlife, or put forward mitigation measures. While this may involve the loss of some green spaces, particularly where they do not perform well in</p> |

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| | | terms of their visual or amenity benefits, it will also mean investing in and improving other areas of greenspace and providing additional green space within new development schemes. |
| | 3. Objections to the loss of green belt. | The concerns regarding the potential loss of green belt land are acknowledged and understood. However the NPPF makes it clear that it is perfectly acceptable for Local Plans to contain proposals for the use of green belt land to meet future development needs where there are exceptional circumstances which justify it. There are clearly such exceptional circumstances within the district. The district needs to make provision for a very large number of new homes over the plan period and the available and deliverable land supply is insufficient to meet this need in non green belt locations. Having established that there is a need for green belt deletions it is important that deletions are focused where possible in the most sustainable locations and in reasonable proximity to the areas of greatest need. The most sustainable locations are the Regional City of Bradford and the Principal Towns Of Keighley, Ilkley and Bingley. These areas will see the majority of green belt releases to meet development needs. |
| | 4. Concerns over the impact on the character of the settlements, on landscape and wildlife. | The Council understands the concerns raised with regards to the impact of development on local character and on landscape and wildlife. In many cases it is suggested that the careful selection of sites and sympathetic and high quality design can avoid or mitigate such impacts. |

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| 36. Supporting evidence – SHMA and AHEVA | 1. The evidence presented in both the SHMA and AHEVA show that there is little to justify the release of land in lower Wharfedale. The SHMA presents scant evidence of substantial housing need in the area. It also shows that building large numbers of homes in the valley would not address the need for affordable housing in the District. It would deliver housing at the wrong price in the wrong place. | Section 3 of the Core Strategy sets out how the Preferred Option has been arrived at. The housing distribution has been informed by a range of evidence, and this is set out in Policy HO3. To be considered sound the Plan must meet the full needs for market and affordable housing within the housing market area. The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. Policy HO11 aims to deliver this through a variety of measures including developer contributions for affordable housing. An objective of the Core Strategy is to locate the majority of new homes (including affordable homes) in sustainable locations close to public transport, services, facilities and employment. The majority of new homes are proposed in the Regional City of Bradford and the principle town of Keighley. |
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Policy HO4 – Phasing the Release of Housing Sites

| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL’S RESPONSE |
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| 1. Support the policy – need for phased development in line with infrastructure. | 1. Yorkshire Water strongly supports part 5 of this policy. As stated in SC5, it is essential that development is phased in line with infrastructure | Support noted. |
| | 2. The Highways Agency would support “The need to ensure that the scale and timing of development is co-ordinated with the provision of new infrastructure” and would | The support is noted and the Council will continue to engage with utility providers and key bodies such as the Highways Agency throughout preparation of the Local Plan. |

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| | welcome more detailed discussions on this matter at the earliest opportunity. | |
| | 3. Broad support for the principles underlining the phasing of sites. | Support noted. |
| 2. Objection to the principle of having a phased release of sites. | 1. We object to the phased release of sites and are not aware of any evidence or justification to warrant this. | The justification for the phased release of land is clearly laid out in paragraphs 5.2.44 to 5.2.46 |
| | 2. At a time when housing delivery in the District has fallen to an unacceptably low rate, the introduction of a phased release mechanism that holds back house building is not appropriate. | We do not accept this argument. There is no reason why the use of phasing will hold back house building provided sufficient sites are identified in the two phases and they are all deliverable. It is clearly not the case that all of the land supply is needed instantaneously at the start of the plan period. Is the objector really suggesting that house building will be held back at the start of the plan period when land will have been allocated for 8/15 of the total need over the plan period to 2030 i.e. land for nearly 22,500 homes?! |
| | 3. The phasing proposals (Policy HO4 Part B and HO7) inappropriately reintroduce the old PPG3 approach and will inhibit smooth and full delivery of the annual housing requirement figures across the plan period. | We do not accept this argument. There is nothing in PPS3 which indicates that phasing policies cannot be included within the plan. |
| 3. Objection to the detail of the policy | 1. The principles laid out in criteria 1 to 6 are reasonable but at present are weak through lack of detail. | Disagree. The objector does not elaborate on what is wrong with the policy and what aspects should be strengthened and in what way so it is quite difficult to respond. The criteria are not weak - it is the |

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| | | whole point of the policy to leave the detailed application to the Allocations DPD. |
| | <p>2. Comments made to the previously developed land element of the policy – the phasing policy should promote the release first of brown field land; phasing of sites should be sequential and dependent on PDL targets being met; the city should be regenerated and PDL sites developed first – once the good green filed sites are gone we are never going to get developers to look at the brown filed sites.</p> | <p>One of the goals of Policy HO4 is to encourage the take up of brown filed sites. However a site's status as PDL or green field is only one of the criteria that should be used and there is a need to ensure that there is always an adequate and varied supply of deliverable sites throughout the plan period. A brown field first or 'no development until all brown field land is developed' approach would be contrary to the NPPF and would frustrate the delivery of the required number of homes in the district and in so doing would undermine regeneration, undermine the economy, as a result of the shortage of new homes. It would also result in a permanent shortage of land when judged against the requirement to maintain a 5 year supply of deliverable sites contrary to Government policy and this would in turn provoke precisely the sort of development the objector seek to avoid as it would lead to unplanned and uncoordinated releases of green belt and green field sites.</p> <p>The Council will need to work with developers to promote the development and take up of regeneration sites particularly where such sites lie in areas which are not viable to develop.</p> |
| | <p>3. Housing development should be coordinated with development of schools, commercial and industrial districts to achieve this aim</p> | <p>The comments are noted.</p> |

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| | <p>4. We object to Part B. Firstly a 5 year supply is a national policy and may in fact become a 6 year supply (NPPF). There are several housing trajectory's in Appendix 6, all of which suggest a significant increase in house building is urgently required. The housing trajectory at page 323 provides in the blue vertical bars a 'projected completions' rate. This is not a target.</p> | <p>There is no reason why the policy should not refer to the 5 year land supply requirement just because it relates to Government policy and that policy might change. If that were the case then nothing would go in the plan! The objector is correct that the policy should not refer to the trajectory as the trajectory is not itself a policy or target. A revised more general reference to achieving the overall housing target within Policy HO1 has been added.</p> |
| | <p>5. Support the inclusion within part B that decisions on land released should have regards to a range of principles. Our view is that there is a clear hierarchy with principles 1 and 2 relating to meeting housing needs being paramount. Other principles, for instance that relating to brownfield land is in our view less of a driver.</p> | <p>Disagree. The Council considers that the principles are all of equal importance and there is no need or justification to rank or prioritise them.</p> |
| | <p>6. In terms of principles for phasing the release of housing sites set out within Policy HO4, our client's site at Brighthouse Road, Queensbury is suitable to be brought forward within the first phase of development under the LDF.</p> | <p>The comments are noted however it is not the role of the Core Strategy to make such phasing decisions. This will, be matter for the Allocations DPD to determine in line with the principles established in this policy.</p> |
| | <p>7. Although the development of the Silsden</p> | <p>There is no need for an amendment to the policy. It is not</p> |

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| | <p>Eastern Bypass is considered integral to the bringing forward of a large proportion of safeguarded land sites within Silsden, we would suggest that its development is not fundamental to the development of a proportion of the Site at Keighley Road as recognised in the Council's SHLAA and referenced accordingly in Part C of this form. We would request therefore that clarification on this matter is provided within the Core Strategy Document in reference to both Policies AD1 and HO4.</p> | <p>appropriate for the specific circumstances of individual sites to be mentioned in the policy or supporting text to Policy HO4. This is because the policy only sets out general principles for phasing. Furthermore if the specific circumstances relating to one site were added, then many others would have to also be added making the policy lengthy and impeding the clarity of its aims. There would also be a danger that the plan would become out of date if circumstances changed. If infrastructure is not a barrier to the release of a particular site, as the objector suggests is the case at Silsden, then this will not be a factor in determining which phases a site is placed in.</p> |
| | <p>8. Suggests the need to add a criterion to the policy to ensure that a range and choice of house types, sizes and tenures are provided.</p> | <p>Agree. A new criterion has been added to the revised policy within the Publication Draft document.</p> |
| | <p>9. It is suggested that all sites currently allocated for housing development in the RUDP together with all safeguarded land such as the site at Denholme should be identified in the policy as being in the first phase to be released.</p> | <p>Disagree. The suggested change would undermine the whole purpose of the policy - to manage housing growth in a sustainable way. While the policy sets out general principles for phasing it is entirely right that the final decisions on how sites are released should lie with the Allocations DPD. The Council also believes that phasing release in smaller settlements such as Denholme and not allowing all development to be focused at the start of the plan period is particularly important where development is aimed at meeting local need over the whole plan period.</p> |

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| 4. Need to bring forward green belt land early in the plan period | 1. The CSFED justifies the need for a phased land release on the basis that if unmanaged the efforts to maintain a focus on previously developed land and urban regeneration will be undermined. This implies that the Council will not seek to release green field / green belt land until development of previously developed land has been exhausted. To meet its housing targets both in the short, medium and long term, there will be a need to deliver housing from a variety of sources of supply, which includes land currently identified as Green Belt. | There is nothing in either this policy or any other to indicate that the Council is proposing not to release green field or green belt land until all PDL land is developed - the objector's suggestion that there is plainly wrong and unfounded. |
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Policy HO5 – Density of Housing Schemes

| SUMMARY OF MAIN ISSUE RAISED | SUB-ISSUE | COUNCIL'S RESPONSE |
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| 1. Support for the policy | 1. Welcome the need for densities to take account of their surroundings This reflects the guidance in PPS3 and the need to ensure that housing developments take full account of the character of the area. | Support noted. |
| | 2. Metro supports the policy to have high density development close to existing public transport corridors. More clarification is | Support noted. However it is not considered that any further elaboration on the term 'significantly higher densities' is needed. One of the key principles of the policy is to allow flexibility to judge |

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| | needed to what is considered 'significantly higher densities'. | each site on its merits while where possible achieving the minimum density of 30 dph. Moreover the policy states that the other DPD's will set local targets and it is here where higher (or lower) density targets will be set and explained. |
| 2. Objection to the principle of having a density policy | 1. The requirement for housing development to, "... normally achieve at least a minimum of 30 dwellings per hectare..." is contrary to guidance in PPS3 which removed this indicative threshold in 2010; | This is an incorrect interpretation of the revised PPS3. The national indicative minimum density of 30dph was removed by the Government simply because the Government considered that it was up to local authorities to determine its own density targets. |
| | 2. Whilst it is recognised that the policy does insert some flexibility it is suggested that the policy is benchmarked on the now obsolete and deleted PPS3 minimum density of 30dph; | The policy is not benchmarked to a national policy in former PPG3 - the RUDP has had a locally derived minimum benchmark of 30dph in place since its adoption in 2005. Policy HO5, as currently worded sets a minimum benchmark and leaves more detailed density targets to the rest of the Local Plan. However the remaining parts of the local plan, in particular the Allocations DPD will not be in place for a while and therefore it is thought important to have a policy which allows for negotiation of higher densities on sites located along public transport corridors where densities should be much higher. At the same time the policy allows for the negotiation of lower densities where clearly justified by factors such as the nature of the site, its surroundings and the type and size of homes needed in the area. |
| | 3. The need for family homes and the meeting of Policy HO9 Lifetime Homes standards | The Policy has been based on local circumstances not the previous national minimum. It is not accepted that the provision of family |

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| | <p>increase the footprint of future homes in the district. A new target based on local factors rather than the previous national minimum should be adopted.</p> | <p>homes or specification of lifetime homes standards will necessarily require densities lower than 30dph and on the limited occasions where lower densities are justified, the policy wording allows flexibility tom accommodate this.</p> |
| <p>3. Objection to the density targets chosen</p> | <p>1. It is suggested that the policy should explicitly allow for lower densities than the 30dph minima subject to a range of criteria.</p> <p>Whilst supporting the general principle in part A of making the best and most efficient use of land part B and its 30 dph minimum does not reflect the most up to date version of PPS3 which makes it clear that account must be taken of several factors in setting density policies and applying them to individual schemes. In particular provision of open space, reducing the impacts of climate change, the characteristics of an area and desirability of achieving high quality, well designed housing. Part B should therefore be modified to make it clear that there will be circumstances which make it desirable to have a lower net density on specific sites.</p> | <p>Disagree with the suggested change. As the respondent acknowledges the policy already allows some flexibility by inclusion of the word 'normally'. However it is important that these are exceptions rather than the rule. The proposed wording change would unacceptably weaken the policy and lead to a less sustainable and less efficient use of land.</p> |
| | <p>2. Objects to the minimum density requirement of 30dph. Criterion B and C would be deleted.</p> | <p>Disagree. The inclusion of the criteria are essential if land is to be used efficiently and the loss of green field land and green belt is to be minimised. The majority of development within the district is</p> |

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| | | proposed to occur in the regional city and principal towns where development patterns should maintain reasonably high densities in order to maintain sustainability and prevent urban sprawl. There are caveats in the policy to allow for departures from this approach where clearly justified. |
| | 3. We note the recommended density per hectare. While some sites may be suitable for this others may be less so and the final density should depend on type and size of dwelling appropriate to its location. | The comments are noted. It should be pointed out that the policy already takes this issue into account both within criterion a which states that the density should reflect the nature of the site, its surroundings and the type and size of housing needed in the area and also by allowing flexibility by inclusion of the word 'normally'. |
| | 4. Any new housing should be high density, affordable and energy efficient. | The comments are noted, however this will not be possible in all circumstances and it is right that the policy allows flexibility. |
| | 5. Concern over the proposed increase in housing density and its appropriateness within rural areas. | The Core Strategy is not proposing any increase in density. It is maintaining the RUDP's minimum requirement to achieve 30dph but is offering more flexibility by allowing the setting of local targets based in individual circumstances / local character within the Allocations DPD. |
| | 6. The Highways Agency notes the intention to leave the issue of housing densities to the Allocations DPD and the two AAPs. However we would comment that these matters could affect the area of land and number of sites needed for housing. It will also affect trip rates which, in turn, could alter the extent of | The comments are noted however the sort of detailed appraisal of the impacts of development on the highway network will not in any case be possible until the allocations are determined and this is not a matter for the core strategy. |

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| | any impact on junctions on the SRN or adjacent junctions on the District primary road network. | |
| | 7. Generally speaking, house builders are now seeking to deliver more family homes on densities of around 25-35 dwellings per hectare, even within larger schemes. The aims of Policy HO5 are contrary to the evidence in the Strategic Housing Market Assessment (SHMA). Essentially Policy HO5 is seeking to continue to deliver a large proportion of flats, while the SHMA shows that the need is for larger family homes. | This is an unfounded objection. The policy is seeking a minimum density of 30dph which seems entirely in line with the objector's explanation of the sort of densities that developers are seeking to achieve. Furthermore it is inexplicable as to how the policy could be interpreted as pursuing delivery of a large proportion of flats. Neither is the policy in conflict with either the original or revised SHMA. |
| | 8. Whilst supporting the general principle in part A of making the best and most efficient use of land part B and its 30 dph minimum does not reflect the most up to date version of PPS3 which makes it clear that account must be taken of several factors in setting density policies and applying them to individual schemes. In particular provision of open space, reducing the impacts of climate change, the characteristics of an area and desirability of achieving high quality, well designed housing. Part B should therefore be | The text in support of Policy HO5 at para 5.2.48 already recognises the role which factors such as those mentioned by the objector can play in resolving the most appropriate density. The imperative to make best use of land bearing in mind the enormity of the land requirement in the district and the contribution which avoiding unduly low densities will make to securing sustainable patterns of development is set out in the text and in the Council's view justifies the approach. It is likely in most cases, given good site design that at least 30 dph will be achievable and the relatively few occasions where this may not be the case can be addressed at the planning application stage. To amend the policy for these exceptions would undermine the whole purpose behind the policy. |

| | modified to make it clear that there will be circumstances which make it desirable to have a lower net density on specific sites. | |
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| Policy HO6 – Maximising the Use of Previously Developed Land | | |
| SUMMARY OF MAIN ISSUE RAISED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Support for the policy | 1. We generally agree with the District wide target of a minimum 50% of development on previously developed land with some variations for Bradford Shipley and Keighley. This is a realistic target and we welcome that the Council recognise the previous levels of brownfield development seen in recent years cannot be sustained. Brownfield delivery has never really risen above 1,200 per annum for any sustained period and for that reason a target no higher than 50% is appropriate. | Support noted. |
| | 2. Support for the policy in relation to the potential re-use and redevelopment of Conditioning House on the edge of the city centre. | Support noted. |
| | 3. Support the policy as it recognises the need to release green field land to meet the housing target. | Support noted. |

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| | 4. General support is offered to the variation in previously developed land quotas expressed in Policy HO6 as this recognises the limited supply of brown field land in some areas such as Silsden. | Support noted. |
| 2. Objections relating to the detail of the policy and its wording | 1. Object to the use of the words 'maximising' as this relates to wording from PPS3 which has now been abandoned and could be used by some to advocate higher densities. | Just because the NPPF does not use a particular phrase such as 'maximising use of previously developed land' does mean that this is an inappropriate planning policy and goal. There is no reason why the wording of the policy will result in developers pursuing inappropriately high densities. |
| | 2. Objects to the wording of criterion D and the text stressing that action 'will' be taken if performance slips outside of the acceptable range B. The 50% target may not be achievable and therefore the wording should be more flexible. | Disagree. It is suggested that it is good practice, if targets are set, that there are both policies in place to help achieve those targets and a review process to monitor outcomes. It is also good practice to set out what may trigger a review of the policies if performance departs from the desired outcomes. |
| | 3. Objects to the lack of specific reference to quarry sites as strategic previously developed land opportunities. | The aim of the policy is highlight the importance of maximising the use of PDL and to set targets. The policy does not aim to list all the different types of PDL land that may exist in the district. The target for Bradford in Policy HO6 already includes an assumption based on the SHLAA of contributions form the two sites mentioned by the objector. |
| | 4. Concerns that the approach to previously developed land is not entirely consistent with | This appears to be more a matter relating to the wording of Policy SC5. |

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| | <p>the sequential approach as expressed within Policy SC5. Objections have been made to SC5 as it is too inflexible and does not reflect that brown field priority needs to be applied flexibly where there is a shortage of developable brown field land.</p> | |
| | <p>5. Principle 2 - Policy SC5, Criterion 1 states that the first priority in identifying land for development will be the re-use of previously developed land and buildings. The reuse of buildings is currently not mentioned in Policy HO6/A.</p> | <p>It is agreed that Policy HO6/A should make reference to the re-use of buildings as well as land. An amendment to the policy has been made accordingly.</p> |
| | <p>6. Lack of clarity as to whether the target applies cumulatively when taking into consideration development in all local service centres or whether each centre should ensure the specified target is met. The latter may prove difficult to achieve and a barrier to development in service centres where little PDL is available for development.</p> | <p>It is accepted that it is not clear as to how the targets should be applied. The targets are meant to apply to the cumulative delivery across the group of settlements in that tier and this has been made clear by amendment to the wording of the supporting text.</p> |
| | <p>7. PDL targets should be expressed as being subject to the availability and deliverability of sites identified through the SHLAA.</p> | <p>The proposed change is unnecessary and unjustified as the targets have already been based on the evidence within the SHLAA. The proposed change would remove the level of certainty for plan making on the Allocations DPD.</p> |

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| <p>3. Arguments that sufficient brown filed sites exist to prevent need for green field development</p> | <p>1. The need for greenbelt deletions cannot be demonstrated ahead of SHLAA2, therefore 5.2.30 'Results from the SHLAA also show that to meet the scale of the remaining housing requirement will require the incorporation of a significant contribution from currently designated areas of safeguarded land and currently designated green belt' is premature</p> | <p>The policy was not premature, it simply reflected the evidence as it stood at the point of production of the CSFED. The SHLAA update has now been completed and the overall position regarding a shortage of deliverable land supply and need for green belt is unchanged.</p> |
| | <p>2. The SHLAA1 site area parameter of >0.4 hectares predisposes the sites offered toward being open greenfield and it should come as no surprise that (5.2.61) 66% of the land offered under SHLAA1 is greenfield. As PDL often comes in smaller parcels of land, the SHLAA2 search for sites >0.2 hectares will undoubtedly bring in more brownfield sites.</p> | <p>The results of the SHLAA are not purely determined by the site threshold. There is plainly and simply a shortage of viable and developable brown field sites in comparison to the scale of housing need in the district. As the objector suggests SHLAA2 has adopted a lower site size threshold but the results still show the need for both green belt and green filed land.</p> |
| | <p>3. There are lots of brownfield sites which could be used within Bradford before green field sites are looked at.</p> | <p>No evidence is given to support this sweeping assertion. The SHLAA suggests that there is a finite and limited amount of brown field land in the district which is genuinely viable and developable and the Council's policies and targets have to reflect this assessment.</p> |
| | <p>4. The Council should look very carefully at the present "brown field" sites available, e.g.</p> | <p>The comments are noted. The aim of the SHLAA is to assess both green field and brown field site opportunities and the Council</p> |

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| | the Bronte school site, the Braithwaite school site including the adjacent field where the flats stood, the Branshaw school site and the site which housed the resource centre at the bottom of Fell Lane. | welcomes suggestions of additional sites which are not currently included in the SHLAA. |
| 4. Suggestions that the policy should be more draconian by preventing any development on green field sites before brown filed sites are all developed | 1. All brown field sites in the Bradford district should be used up before any green field sites or green belt land in Wharfedale, Keighley etc are released for housing or employment. | This is impossible given the scale of housing need, and the available supply of developable sites. Moreover it would not produce the right balance and mix of new homes to meet all of the needs of district. A site's status as brown or green field is only one aspect of its suitability and sustainability for development. |
| | 2. We appreciate the requirement by the council to fulfil their difficult obligation to maintain a 5 year supply of land for future housing development, we would ask that first priority be given to the use of the innumerable Brownfield sites within a small radius of the area of outstanding natural beauty that is Pitty Beck valley. | The Council's assessment of the 5 year land supply already takes account of the deliverable brownfield sites which could contribute. The Core Strategy policies including HO6 already seek to maximise development on such land as far as is consistent with maintaining a deliverable supply of land while the phasing policy will ensure that the development of such sites is prioritised where possible. |
| | 3. More emphasis should be made in encouraging the use of brownfield sites and buildings before green field sites are even considered. | The policy already encourages the use of PDL and strikes the right balance between encouraging such re use and ensuring that the land supply is deliverable. It would not be possible to place a moratorium on green field development before PDL is implemented, indeed doing so would simply constrain and frustrate the development of the homes needed and would be contrary to the |

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| | | NPPF. However the phasing policies will ensure that PDL is prioritised. |
| 5. The previously developed land targets should be higher. | 1. Only brownfield sites should be used. PDL target should be 100% not 40%. | No evidence or justification is given to support a 100% PDL target. The policy already encourages the use of PDL and strikes the right balance between encouraging such re use and ensuring that the land supply is deliverable. It would not be possible to place a moratorium on green field development before PDL is implemented, however the phasing policies will ensure that PDL is prioritised. A 100% PDL target would be unjustifiable. |
| | 2. Unless developers meet robust targets (we suggest 80%, a figure surpassed for all previous years 2004-10) for the development of PDL over the whole period to 2028, greenfield land should not be released except within the current settlement boundaries of Bradford and in the Local Growth Centres. Targets in these two areas should also be tied to percentage of total PDL reserves i.e. no release of greenfield sites until PDL reserves are less than 20% of those identified after SHLAA2 plus windfalls. | Such an approach would frustrate the delivery of the required number of new homes and would be contrary to NPPF. Targets have to be realistic based on evidence and achievable. Maintaining recent levels of PDL delivery when overall completions have to be at levels 4 times recent levels (of around 3000 dwellings per annum compared to around 700) and given the type of need and given the nature of the land supply will be simply impossible. |
| | 3. Objection to the target of only 40% previously developed land in Keighley. The figure should be 100% | Firstly the 40% target is not a target for Keighley but a target for the Principal Towns as a whole. The target for Keighley could therefore be higher though must be realistic in terms of the deliverable land |

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| | | <p>supply. This overall target reflects the results of the SHLAA. It is simply not possible to advocate or impose PDL targets which are not achievable and achievability has to relate to the SHLAA's appraisal of the availability of viable and developable sites. Should more brown field land which is developable be identified ahead of production of the Allocations DPD, there is nothing to stop the Allocations DPD producing a higher proportion of PDL sites.</p> |
| | <p>4. We are unclear as to whether the housing proposals fully utilise all the available brownfield land and cleared sites in Bradford</p> | <p>The Core Strategy's overall proposals regarding previously developed land reflect the analysis of the SHLAA which covers such brown field sites as well as green field sites. However the Core Strategy targets must be based on the supply of deliverable brown field land. Government guidance required that only deliverable and viable sites – whether green field or brown field – can be considered as part of the potential land supply. The SHLAA will be updated on a regular basis and therefore any potential sites not included in the current iteration will be added at the next review. However the Council are confident in the overall conclusions of the SHLAA which point to the need for significant development on green field sites if Bradford is to address its housing needs.</p> |
| | <p>5. The Core Strategy has weak targets to ensure PDL sites are developed before green fields. The District-wide target is only 50%, reducing to 40% in Principal Towns, 15% in Local Growth Centres, and 35% in Local Service Centres.</p> | <p>The targets reflect the nature of the evidence of what is achievable at this time. If the evidence changes and indicates that higher targets are achievable and would not frustrate the delivery of the required number and range of new homes then higher targets can be considered.</p> |

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| 6. The previously developed targets are too high / the policy too restrictive. | 1. Whilst it is correct that the redevelopment of previously developed land should be encouraged, we are concerned that the imposition of minimum targets could restrict the delivery of well-located sustainable greenfield sites and restrict the development of new homes. | The targets have been based on the land supply data from the SHLAA and are in no way onerous. Given that they are based on the SHLAA, the production of which has involved Persimmon Homes, there is no reason to suggest that they will restrict development in any way. The amendment of the policy to omit the expression of the target as a minimum and to make the policy purely aspirational would render it toothless in influencing and encouraging the use of brown field land - which is presumably precisely the intention of the objector in making the suggested change. |
| | 2. The target for the City of Bradford of 60% is flawed based on the results of the SHLAA. | The revised target for the city in the Publication Draft has been reduced from 60% to 55% and this reflects the evidence available at this time. |
| | 3. Objection to part a) and c) which suggests a potential moratorium of Greenfield land being progressed. It is noted that paragraph 5.2.68 states that the Council are not proposing a moratorium of development of Greenfield sites. However this is not reflected in the current wording of the policy. | This is simply incorrect. The objectors comment that policy represents a moratorium on green field development is ridiculous. |
| Policy HO7 – Housing Site Allocation Principles | | |
| SUMMARY OF MAIN ISSUE RAISED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Support for policy. | 1. Support for the policy in relation to the | Support noted. |

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| | potential re-use and redevelopment of Conditioning House on the edge of the city centre. | |
| 2. How the policy is used. | 1. All policies, but in particular HO7, should be made mandatory not just for LDF setting but for implementation by the Council and its Planning Committees. | The support for the policy is noted however in any decision the policies of the relevant plan as a whole together with national planning policy must form the framework for decision making. Specific policies cannot be 'made mandatory' in isolation of all other policies and material considerations. |
| 3. Unclear what the purpose of the policy is and how it will be implemented | 1. It is not clear what purpose the policy serves and how it will be implemented. These are matters which will be covered in the Allocations DPD | The policy sets out the main principles for ensuring that the site selection and appraisal process produces the best and most sustainable range of policies. This is explained within paragraphs 5.2.69 to 5.2.74 of the CSFED |
| | 2. Supports section 7 of the policy but objects overall as it is not clear how the policy will be implemented given that it is not an exhaustive list of all factors. | The policy is explained and justified within paragraphs 5.2.69 to 5.2.74 of the CSFED. It is not clear why the objector is confused as to how the policy will be implemented. The policy will be applied within the site selection and appraisal process of the Allocations, Bradford City Centre and Shipley and Canal Rd Corridor DPD's. |
| 4. Green belt and green field land. | 1. Two respondents including Natural England supports the Policy text Part 6: Minimising the use of green belt land within the Plan area. | Support noted. |
| | 2. No distinction should be made between green field and green belt land - a combined criterion should be added to read 'minimising the use of green field and green belt land | Disagree - there is a clear and substantial difference in approach within national planning policy to green belts as opposed to green field land and this needs to be reflected within the policy. |

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| | provided that there is a range and choice of housing opportunities within any one Plan area'. | |
| | 3. The Site Allocations criteria are supported but should be strengthened in respect of Green Belt minimisation by also addressing issues which impact upon the 'purposes' of the Green Belt and protect against its fragmentation. | The comments are noted however a change to the policy is not justified. Adding text relating to the purposes of the green belt would be lengthening the policy unnecessarily and would be merely repeating what is already set out in the National Planning Policy Framework. Similarly the issue of whether green belt is fragmented is a local issue which would be best dealt with in the Allocations DPD. |
| | 4. The reference to minimising the use of Green Belt land within the plan area goes against the findings of the SHLAA and Policy HO2 relating to housing supply and does not seem to take into account the fact that 29% of the Council's supply calculation comes from Green Belt releases. | Disagree. The statement that green belt use should be minimised is entirely consistent with national planning policy which states that green belt should only be released to meet development needs in exceptional circumstances. Suggesting that green belt use should be minimised does not preclude the use of green belt where the land supply from other sources is insufficient. The SHLAA contains significant amounts of green belt land but this does not mean that all such land within the SHLAA should or will be needed or allocated within the Local Plan. |
| | 5. Our client objects to part 6, which seeks to minimise the use of Green Belt land within the plan area. Our client believes that there will be a need for Green Belt land to be released and brought forward early on in the plan period to | There is nothing in the policy to suggest that green belt will not need to be released to meet the housing needs of the district. |

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| | ensure that Bradford is able to meet its housing targets, which based on the 2008 based household projections are around 2,822 per annum. | |
| 5. Maximising the use of previously developed land. | 1. Broadly support the policy and the range of factors included within it however object to references to maximising the use of previously developed land. | Maximising the use of previously developed land is a perfectly reasonable principle particularly as the policy also emphasises the need to allocate sufficient deliverable and developable land. |
| | 2. We broadly support the housing allocation principles. However reference to 'maximising' in criterion 3 is not appropriate and should be altered to read 'prioritising'. | The wording is consistent with Policy HO6 and is in the Council's view the right approach consistent with sustainable development principles. |
| 6. Objections and comments relating to the detail of the policy. | 1. Concerns that the approach to site allocations principles is not entirely consistent with the sequential approach as expressed within Policy SC5. Objections have been made to SC5 as it is too inflexible and does not reflect that brown field priority needs to be applied flexibly where there is a shortage of developable brown field land. | It is not clear what is meant in this objection and at face value the concern seems to be with Policy SC5 rather than policy HO7. |
| | 2. Criterion 7d - Impact on the landscape and setting - it would be preferable if this Criterion was framed in a manner which set a positive requirement in terms of ensuring that the | Agree. The wording of criterion 7d has been amended accordingly. |

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| | impact of potential housing sites relate well to the surrounding settlement's form and landscape setting. | |
| | 3. Section 7b refers to 'selecting sites accessible to quality public transport services'. This needs to be developed further to tie into formal accessibility assessments including using PTAL as discussed in comment for policy TR1. | The comments are noted. It is considered that the policy criteria should remain broad rather than detailed, however the wording of 7b has been expanded to make cross reference to the transport chapter where the plans transport accessibility approach is explained in much more detail. |
| 7. Suggestions for additional criteria to be added to the policy or text. | 1. A criteria should be added relating to the need to provide a range and choice of housing types, sizes and tenures for each housing area; | Disagree. The need to provide for a range and choice of housing is important however the policy is intended to cover key strategic principles in selecting and comparing options for site allocation. Range and choice of dwellings is a matter which can be determined once sites have been allocated via the planning application process. The suggested criterion goes beyond what is necessary in strategic terms and would therefore dilute the policy. |
| | 2. Objects to the lack of specific reference to quarry sites as strategic previously developed land opportunities. | Disagree. There is no need for such a reference within Policy HO7. |
| | 3. Policy HO7 recognises the need to minimise adverse environmental impacts and includes flood risk, however, it does not give a policy response to deal with it. We recommend an additional bullet point is added | It is agreed that the policy would be improved via the addition of a criteria relating to the application of the flood risk sequential approach and the policy has therefore been amended accordingly with the addition of new criteria 7g) |

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| | under item 7 to demonstrate this, e.g. 'Applying a flood risk sequential approach to direct development to areas of lowest flood risk'. It would also be useful to recognise the link here with policy EN7. | |
| | 4. Comments are made in support of the allocation of a specific site at Queensbury. | The comments are noted but do not warrant any change to the policy. |
| | 5. Bradford has become an undesirable place and all attempts should be taken to improve architectural design and the attractiveness of Bradford as a place to live | These are not matters which are relevant to site appraisal and selection but the quality and design of new development are important matters and are covered elsewhere in the plan. |
| | 6. Natural England does recommend that the Policy text is clarified to refer to the definition of sustainable development that Natural England has recommended be included as part of the Spatial Vision, with the policy aim to ensure that a core aim of the Allocation Principle is sustainable development. | The Core Strategy has been amended to include the model policy P1 setting out the NPPF presumption in favour of sustainable development. |
| Policy HO8 – Housing Mix | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. The need for larger houses in inner city Bradford | 1. The type of housing most urgently required is large, inexpensive houses so that extended families can live together where that is | Comment noted. Policy HO8 sets out the Council's approach to delivering an appropriate mix of housing and identifies strategic priorities. Part D of policy HO8 sets out the strategic priority of |

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| | culturally the norm, near places of work or where the unemployed have a better chance of getting work without having to spend their salary on travel. | increasing the supply of larger homes across the district in particular in areas suffering from high levels of overcrowding. |
| | 2. There is no needs analysis within the document outlining the type of 'affordable housing' that is required. Many housing issues in the inner city of Bradford result from families needing large properties. If the accommodation needed is going to be for 5/6 bedrooms, this should have been scoped and will affect the numbers of houses being proposed. The proposal needs re-writing to include in-depth analysis of the above issues. | It is considered that the Core Strategy is based on robust evidence and data, including the SHMA. The SHMA provides an assessment of housing need and affordable requirements and reviews general market requirements in the district. Policy HO8 sets out the Council's approach to delivering an appropriate mix of housing and identifies strategic priorities. Part D of policy HO8 sets out the strategic priority of increasing the supply of larger homes across the district in particular in areas suffering from high levels of overcrowding. |
| 2. Reference to Lifetime Homes Standard | 1. Concern that reference to lifetime homes standards is too explicit and its delivery depends on viability as well as the local market needs. Recommend deleting the reference to lifetime home standards. | Comment noted. Robust demographic and housing market evidence has been presented that accessible housing is a key issue for the district. It is considered that the inclusion of a policy on accessible housing in the Core Strategy is justified to ensure future housing meets district requirements. However, it is recognised that specific reference a specific standard, such as Lifetimes Homes, may not be appropriate as a strategic aim. Policy HO8 will be reviewed in light of the NPPF and Local Plan Viability Assessment. |
| 3. Need for sheltered housing | 1. We need sheltered housing in Wilsden freeing up some houses for younger people. | Comment noted. The Core Strategy supports the provision of specialist accommodation for older people in suitable locations and |

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| | | in areas greatest anticipated demand. However, it is not considered appropriate to set out site specific details in the Core Strategy as this is a strategic planning document which does not identify individual sites. It is considered these details should be dealt with through the Allocations DPD, which will consider housing mix on individual site allocations. |
| 4. Housing mix – Part B | 1. Support for part B of the policy. Part B of the policy provides the flexibility to enable market demand to influence the appropriate type and size of house in a certain location | Comments of support are noted. |
| 5. Housing mix – Part C | 1. It is unclear exactly how and to what degree specific guidance on house types and mix on an area or site basis will be set out in future documents which will allocate sites | Comment noted. It is not considered appropriate to set out site specific details in the Core Strategy. These details will be dealt with through the Allocations DPD and Area Action Plans, which will consider housing mix for individual site allocations. However, agree that further detail could be set out in the supporting text to the policy on how housing mix will be considered in site the allocation DPDs. |
| | 2. The Highways Agency notes the intention to leave the issues of housing mix and densities to the Allocations DPD and the two AAPs. These matters could affect the area of land and number of sites needed for housing. It will also affect trip rates which could alter the extent of any impact on junctions on the SRN or adjacent junctions on the District | Comment noted. It is not considered appropriate to set out site specific details of housing mix and density in the Core Strategy as this is a strategic planning document which does not identify individual sites. It is considered these details should be dealt with through the Allocations DPD and Area Action Plans, which will consider individual site allocations. Policy HO5 sets out the strategic approach to housing density. |

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| | primary road network. | |
| 7. Housing mix – Part D | 1. Part D is supported which emphasises the need to deliver more family housing across the district, whilst increasing the supply of larger homes. | Comments of supported noted. |
| Policy HO9 – Housing Quality | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Dwelling size | One aspect of housing quality that needs to be considered in the policy is the size of dwellings. Proposals should have to be of a minimum size and offer amenity for families. | Agree that Policy HO9 should consider dwelling size and amenity. Policy HO9 will be reviewed in light of the NPPF and Local Plan Viability Assessment. |
| 2. Sustainable housing standards | 1. Welcome the inclusion of a policy on the sustainable qualities of new housing in providing clarity on expected standards, allowing developers and landowners to better plan for and estimate costs of development at the earliest stages. Welcome that the policy recognises the cost of meeting sustainability standards and that the requirement is subject to viability considerations. | Comments noted. |
| | 2. Concern Policy HO9 implies developments | Noted. The aim of Policy HO9 is to deliver high quality sustainable |

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| | <p>should meet high environmental design and construction standards, based on standards such as BREEAM, Code for Sustainable Homes and Lifetime Homes Standards. There appears to be a lack of evidence to underpin this policy and it is not consistent with national planning guidance.</p> | <p>housing in line with the Council's priorities, carbon reduction targets and national planning policy. The evidence base which has informed policy HO9 is set out in the background and justification text. Policy HO9 will be reviewed in light of the NPPF and Local Plan Viability Assessment.</p> |
| | <p>3. Support part A of Policy HO9 which encourages all new housing development to meet the highest possible sustainable design and construction standards. This allows for flexibility and seeks a target rather than a strict minimum requirement which may not be viable or feasible.</p> | <p>Comments of support noted.</p> |
| | <p>4. Support Part B of policy HO9 which clearly sets out that meeting Code for Sustainable Homes over the plan period will be subject to viability.</p> | <p>Comment of support noted.</p> |
| | <p>5. Object to the reference to Code for Sustainable Homes as this should not be included in a Core Strategy policy. It is likely to be out of date once the Core Strategy is adopted. The Core Strategy should not refer to something that is dealt with at National</p> | <p>Objection noted. It is considered setting a local sustainable housing requirement is in accordance with national planning policy. Agree that the policy should also refer to any national equivalent standard to avoid the risk of the policy becoming out of date if new standards are introduced. Policy HO9 will be reviewed in light of the NPPF and national zero carbon housing policy.</p> |

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| | Level and should refer to the latest National Policy. | |
| | 6. The Code for Sustainable Homes will be more appropriately dealt with through building regulations | Comment noted. It is considered setting a local sustainable housing requirement is in accordance with national planning policy. Policy HO9 will be reviewed in light of the NPPF and national zero carbon housing policy. |
| 3. Renewable energy requirements | 1. Object to HO9 Part E.. The Government is moving towards Zero Carbon Standards and the 10% renewables will be addressed in Zero Carbon proposals, which takes a 'Fabric First' approach. Zero Carbon Standards may replace the Code for Sustainable Homes during the plan period therefore the Core Strategy should refer to the latest National Policy. | Objection noted. Agree that renewable energy requirements will be dealt with through the Code for Sustainable Homes, Zero Carbon Homes or any national equivalent standard. Agree that the policy should also refer to any national equivalent standard to avoid the risk of the policy becoming out of date if new standards are introduced. Policy HO9 will be reviewed in light of the NPPF and national zero carbon housing policy. |
| | 2. Welcome the recognition that there may be circumstances in an area with such a rich historic environment where it may not be possible or practicable for all developments to secure 10% of their energy from decentralised and renewable or low carbon sources | Comments noted. |
| | 3. Fabric enhancement should be an alternative option. We therefore request part | Comment noted. Policy HO9 will be reviewed in light of the NPPF and Zero carbon Housing Policy. |

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| | <p>of the policy is deleted as follows:</p> <p>“Part E: New development of more than 10 dwellings should secure at least 10% of their energy <u>through the use of enhanced built fabric</u> or from decentralised or renewable or low carbon sources, unless, this is not feasible and or viable.”</p> | |
| 4. Viability | <p>1. Clarity should be provided either in the policy or text on how viability considerations will be determined when sustainable targets and planning obligations are required. It should set out whether one or the other will be prioritised or whether this will be determined on a case by- case basis.</p> | <p>Noted. Agree the Core Strategy should provide guidance on how financial viability will be considered. The Local Plan Viability Assessment will inform the approach taken in regards to viability in the Local Plan. Policy HO9 will be reviewed in light of the NPPF and Viability Assessment.</p> |
| 5. Lifetime Homes | <p>1. The policy should provide some flexibility based on viability to reflect the challenging economic climate. If this is not the case, elements of Policy HO9 should be clarified or deleted. Any duplication of guidance set out in Building Regulations would be contrary to PPS12 - which seek to limit the repetition of national and regional standards.</p> | <p>The standards in the Policy H09, including Lifetime Homes are all subject to feasibility and viability. Agree that this should be fully clarified in the policy. PPS12 has been replaced by the NPPF. Policy HO9 will be reviewed in light of the NPPF and Local Plan Viability Assessment.</p> |
| | <p>2. Objection to Part F. The proposed requirement for Lifetime Home standards is in</p> | <p>Objection noted. Robust demographic and housing market evidence has been presented showing that accessible housing is a key issue</p> |

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| | <p>advance of the national timescale established in “Lifetime Homes: Lifetime Neighbourhoods” which does not require such standards until 2013 at the earliest. This section of the Policy is inconsistent with national planning policy and is therefore unsound and should be removed from the Core Strategy.</p> | <p>for the district. It is considered that the inclusion of a policy on accessible housing is justified to ensure future housing meets the requirements of the district. The requirement for Lifetime Homes is not considered to be unsound. However, it is recognised that the requirement for all homes to meet this specific standard may not be the only or best means of delivering accessible housing. Policy HO9 will be reviewed in light of the NPPF and Local Plan Viability Assessment.</p> |
| | <p>3. Lifetime Homes is a perverse policy which drives up house prices and makes new homes less affordable. It reduces the availability of lower-priced first-time buyer housing and it persuades people to remain in under-occupied housing. It does not reflect the lifecycle use of new houses that contribute less than 0.5% to the country’s housing stock each year. We therefore request that part f of the policy is deleted.</p> | <p>The requirement and relevant cost of Lifetime homes were included and tested in the AHEVA. The costs of meeting Lifetime Homes standards were estimated to be up to £545 per dwelling. It is considered that the inclusion of a policy on accessible housing in the Core Strategy is viable and justified to ensure future housing meets the district’s requirements, in particular for older people and families. However, it is recognised that the requirement for all homes to meet this specific standard may not be the only or best means of delivering accessible housing. Policy HO9 will be reviewed in light of the NPPF and Local Plan Viability Assessment.</p> |
| | <p>4. Object to HO9 Part F which requires all new housing to be built to Lifetime Homes Standards from 1st April 2012. There is no evidence to justify this requirement.</p> | <p>Objection noted. Robust demographic and housing market evidence has been presented that accessible housing is a key issue for the district. The requirement and relevant cost of Lifetime homes was included and tested in the AHEVA. It is considered that the inclusion of a policy on accessible housing in the Core Strategy is justified to ensure future housing meets the requirements of the district, in particular for older people and families.</p> |

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| | <p>5. Strongly oppose the requirement for all new housing to meet Lifetime Homes Standards by April 2012. Imposing this burdensome requirement is unrealistic in the current economic climate and will serve to undermine housing delivery and economic growth. The date by which all new housing should be built to Lifetime Homes Standards is also not capable of implementation and as such its policies will carry little weight.</p> | <p>Objection noted. The requirement and relevant cost of Lifetime homes was included and tested in the AHEVA. The costs of meeting Lifetime Homes standards were estimated to be up to £545 per dwelling. It is considered that the inclusion of a policy on accessible housing in the Core Strategy is viable and justified to ensure future housing meets the requirements of the district. However, it is recognised that the requirement for all homes to meet this specific standard may not be the only or best means of delivering accessible housing. Agree that the date of implementation should be amended. Policy HO9 will be reviewed in light of the NPPF and Local Plan Viability Assessment.</p> |
| | <p>6. The requirement for all new housing should be built to Lifetime Homes Standards from 1st April 2012 could impact on the viability of schemes resulting in non-delivery, particularly for some previously developed sites where scheme viability could be marginal. The Core Strategy should provide flexibility in the wording so that this requirement would not undermine housing delivery.</p> | <p>Comment noted. See Council's response above. The Lifetime Homes standard is subject to feasibility and viability. Agree that this should be fully clarified in the policy.</p> |
| 6. Housing design | <p>1. The Plan should do more to improve the look and quality of new housing and development standards.</p> | <p>Agree the design and quality of new housing is important and appropriate and viable standards should be set out in the Local Plan. Policy HO9 will be reviewed in light of the NPPF and Viability Assessment.</p> |

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| | <p>2. Worry about the quality of housing intended to be built as this can affect an area's perception and quality of life for its residents. Worry that the large construction conglomerates will simply install their standard quality, ill thought out housing from their identikit catalogue of dreadful designs that will not cater for the strong sense of community in Silsden.</p> | <p>Noted. Agree that the design and quality of new housing is important and appropriate and viable housing design policies should be set out in the Local Plan. Policy HO9 encourages all new housing developments to meet the highest possible sustainable design and construction standards and sets out minimum acceptable standards in relation to sustainable design. Specific guidance on housing quality on an area or site basis will be set out as necessary in the Allocations DPD. Policy HO9 will be reviewed in light of the NPPF and Viability Assessment.</p> |
| 7. Design stage assessment | <p>1. Object to Part C of HO9 as we are not aware of any justification for requiring a Design Stage Assessment of performance against the Code for Sustainable Homes and Building for Life criteria for all residential properties. The Council have a local validation checklist in which to stipulate what information is required to support a planning application it is therefore unnecessary and incorrect to request such information in a Core Strategy.</p> | <p>Objection noted. Design stage assessments are encouraged as they can help a development achieve higher levels of sustainable design from the outset. However, agree that requiring a design stage assessment may not be appropriate in Core Strategy Policy HO9. Policy HO9 will be reviewed in light of the NPPF and Viability Assessment.</p> |
| Policy H010 – Overcrowding | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Empty homes | 1. The council should have to provide statistics to show how much empty housing | Comments noted. Bringing back empty homes is a key part of the housing strategy. A delivery plan for tackling empty homes in the |

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| | there is and why that is not being used to provide 'affordable' housing | district that sets out clear evidence and objectives for reducing the number of empty homes has been produced. This plan will form part of the evidence base for the Local Plan. |
| | 2. Empty homes should be brought back into use before building in Eldwick | Bringing back empty homes is a key part of the housing strategy. A delivery plan for tackling empty homes in the district that sets out clear evidence and objectives for reducing the number of empty homes has been produced. The re-use of empty properties and reducing vacancy levels is an important consideration in understanding the overall amount of additional new-build properties required to match projected demand. However, viable and deliverable areas for new housing will also need to be identified to meet the housing requirement for the district and ensure the plan is sound. |
| | 3. There are reportedly approximately 50 unoccupied houses in Wildsen. Why build more to stand empty? | See Council's response to number 2 above. |
| | 4. Empty homes should be brought back into use before building on green spaces and green belt. | See Council's response to number 2 above. |
| | 5. More should be done about empty homes rather than building new ones | See Council's response to number 2 above. |
| | 6. Empty homes should be converted into affordable housing. | See Council's response to number 2 above. |

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| | 7. Support the use of Compulsory Purchase to get homes brought back into use. Speculative builders should be informed of the consequences of embarking on schemes which are not deliverable for whatever reasons when they apply for planning permission | Comment noted. Bringing back empty homes is a key part of the housing strategy. A delivery plan for tackling empty homes in the district that sets out clear evidence and objectives for reducing the number of empty homes has been produced. This plan will form part of the evidence base for the Local Plan. |
| | 8. Do the housing figures take full account of the empty housing stock? | The housing target is a net one which means that the final levels of land released will need to be adjusted to reflect additional dwellings which may need to be built to compensate for demolitions or fewer dwellings as a result of bringing vacant properties back into occupation. The Government has abolished Regional Strategies through the Localism Act. Local Authorities are now responsible for producing housing requirement figures for local plans. A Housing Requirement Study has been commissioned to inform a local housing requirement. The re-use of empty properties and reducing vacancy levels is an important consideration in understanding the overall amount of additional new-build properties required to match projected demand. |
| Policy HO11 – Affordable Housing | | |
| SUMMARY OF MAIN ISSUE RAISED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Affordable Housing Targets | 1. Object to the 'up to 30%' affordable housing requirement in Policy HO11 part D. A large | Objection noted. The results of the AHEVA have been reflected in Policy HO11. The Towns, suburbs and Worth Valley area is mainly |

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| | <p>part of this area falls within Value Areas 5 and 6 of the AHEVA and says 20% maximum is achievable in Value Area 6. The target should be 'up to 20%' in the District outside Wharfedale, Keighley and inner Bradford. A 30% requirement would create too many schemes needing to consider viability appraisal.</p> | <p>covered by value areas 3 to 5 on the AHEVA value area map. The AHEVA states that 30% is the likely maximum which can be achieved in value areas 3, 4 and 5. Also in accordance with the AHEVA recommendations, policy HO11 is not unduly rigid. This allows for the viability and circumstances of individual sites to be taken account of in determining the affordable housing contribution being sought. It is considered Policy HO11 achieves the correct balance between allowing development to occur, whilst meeting the housing need of the district. However, the targets in Policy HO11 will be reviewed in light of the NPPF and Local Plan Viability Assessment.</p> |
| | <p>2. There are no jobs in Ilkley for people who need affordable housing. Affordable housing should be built near to the source of work.</p> | <p>To be considered sound the plan must meet the full needs for market and affordable housing within the housing market area. An objective of the Core Strategy is to locate the majority of new homes (including affordable homes) in sustainable locations close to public transport, services, facilities and employment. The majority of new homes are proposed in the Regional City of Bradford and the principle town of Keighley. Ilkley is proposed as a principle town in the settlement hierarchy. Principle towns fulfill a District wide role as service, employment and transport hubs. It is considered that there will be a wide range of employment opportunities which will be accessible to future residents in Ilkley, including those living in affordable housing.</p> |
| | <p>3. The Council sets targets for affordable</p> | <p>In accordance with national planning policy the Local Plan should</p> |

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| | housing but never stick to them so this requirement should be ignored because in practice it will not happen. | set policies for meeting identified housing need on site. In accordance with national planning policy HO11 is not unduly rigid and allows for the viability and circumstances of individual sites to be taken account of in the determination of the affordable housing contribution being sought. It is considered Policy HO11 achieves the correct balance between allowing development to occur, whilst meeting the housing need of the district. |
| | 4. Object to Policy HO11 on the grounds that the proposed proportion (30%) of affordable housing to be provided in Principal Towns is too high. If implemented, this policy would make much development largely non-deliverable. As such, the proposed policy is unjustified, unreasonable and unfair. Suggest amending Policy HO11 to ensure much greater flexibility in determining the cost of components of development, and/or to provide for a much lower proportion of affordable housing (e.g. 10% in the Towns). | Objection noted. In accordance with national planning policy affordable housing targets, percentages and thresholds have been subject to a full viability analysis. The results of the AHEVA have been reflected in Policy HO11. In accordance with the AHEVA recommendations, policy HO11 is not unduly rigid. This allows for the viability and circumstances of individual sites to be taken account of in the determination of the affordable housing contribution being sought. It is considered Policy HO11 achieves the correct balance between allowing development to occur, whilst meeting the housing need of the district. However the affordable housing targets in Policy HO11 will be reviewed in light of the NPPF and Local Plan Viability Assessment. |
| | 5. The need for affordable housing in Burley is a continuing one but achieving a 40% level would pose major challenges. | Comment noted. Agree the targets in Policy HO11 will be challenging. Affordable Housing Targets in Policy HO11 will be reviewed in light of the NPPF and Local Plan Viability Assessment. |
| | 6. Generally support the approach to Policy HO11 which seeks negotiations up to the | Comment noted. In accordance with the AHEVA recommendations, policy HO11 is not unduly rigid. This allows for the viability and |

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| | <p>relevant target depending on a site's location and subject to viability. Given the results of the AHEVA it is imperative that Policy HO11 is as flexible as possible. It is difficult to understand how part B of the policy can will aim to ensure that 25-30% of the total housing delivery is affordable housing when in part D it ranges between 15-40% and will be subject to viability. Therefore, there is a degree of inconsistency within the policy.</p> | <p>circumstances of individual sites to be taken account of in the determination of the affordable housing contribution being sought. It is considered Policy HO11 achieves the correct balance between allowing development to occur, whilst meeting the housing need of the district. Part B of the policy was based on the PPS3 requirement that plans set out an overall target for the amount of affordable housing to be provided. The overall target in Part B will be delivered through a variety of sources which includes, but is not limited to, developer contributions as set out in Part D. PPS3 has now been replaced by the NPPF. The targets in Policy HO11 will be reviewed in light of the NPPF and Local Plan Viability Assessment.</p> |
| | <p>7. The Affordable Housing 40% target with a ratio of 70% Social Housing to 30% intermediate ratio needs sensitively reviewed with robust data to ensure such properties meet a real need and are sustainable both for the prospective residents and local community and infrastructure. We consider that applying a one size fits all policy may result in totally inappropriate and unwanted results.</p> | <p>Policy HO11 is based on robust evidence and data, including the SHMA and AHEVA. These evidence base documents were prepared in accordance with national planning policy and guidance. Part G of Policy HO11 states that the Council will seek to ensure an appropriate mix of affordable housing in terms of size, type and tenure having regard to the evidence of the SHMA and any other relevant, robust and up to date evidence of local needs. Policy HO11 is therefore not unduly rigid. It is considered Policy HO11 achieves the correct balance between allowing development to occur, whilst meeting the housing need of the district. Policy HO11 will be reviewed in light of the of the NPPF and Local Plan Viability Assessment</p> |
| | <p>8. Not convinced of the need for such large numbers of social and affordable homes in</p> | <p>Comments noted. To be considered sound the Local Plan must meet the full needs for market and affordable housing within the</p> |

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| | <p>Ilkley. I would have thought it more sensible to build these in Bradford and Keighley, where the demand surely exists.</p> | <p>housing market area. Policy HO11 aims to meet the district's housing need through a variety of measures including through developer contributions for affordable housing. Policy HO11 is based on robust evidence and data, including the SHMA and AHEVA. These evidence base documents were prepared in accordance with national planning policy and guidance. The targets in HO11 Part D are based on housing need, affordability, and economic viability. This is set out in the Core Strategy background and justification section for Policy HO11. An objective of the Core Strategy is to locate the majority of new homes in sustainable locations close to public transport, services, facilities and employment. The majority of new homes (including affordable homes) proposed are in the Regional City of Bradford and the principle town of Keighley. Policy HO11 will be reviewed in light of the of the NPPF and Local Plan Viability Assessment</p> |
| | <p>9. Burley in Wharfedale- What we need is a small amount of affordable housing but what we will get is expensive housing which only well paid professionals can afford. Hence low paid people who are born in the village can't afford to stay there as they can't afford the houses.</p> | <p>Comment noted. To be considered sound the Local Plan must meet the full needs for market and affordable housing within the housing market area. Policy HO11 aims to deliver affordable housing through a variety of measures, including through developer contributions for affordable housing. Policy HO11 requires up to 40% affordable housing on schemes of greater than 5 dwellings in Wharfedale to help meet the overall need for affordable housing.</p> |
| | <p>10. The Authority seems to want to revise the 40% affordable housing in Wharfedale in the RUDP downwards to 22%</p> | <p>This is not the case. Policy HO11 aims to deliver affordable housing through a variety of measures, including through developer contributions for affordable housing. Policy HO11 requires up to</p> |

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| | | <p>40% affordable housing on schemes of greater than 5 dwellings in Wharfedale to help meet the overall requirement for affordable housing. The sub area policies indicate the estimated totals of affordable homes expected to be delivered and what proportion of the total number of new homes in that sub area this represents. Since the zones for applying affordable housing quotas set out in Policy HO11 straddle sub areas in some instances, the two percentage figures (that quoted in the sub areas and that quoted in HO11) will not always be the same.</p> |
| | <p>11. The provision of affordable housing at 40% within Ilkley would lead to empty properties. With jobs in Ilkley at a premium any new residents are likely to work out of the town. With travel costs being high those requiring affordable housing will not be able to afford to travel to work</p> | <p>Comment noted. The plan must meet the full needs for market and affordable housing within the housing market area. Ilkley is proposed as a principle town in the settlement hierarchy. Commuting costs have not been directly taken into account when setting policies to meet affordable housing need as there is no basis for this in national planning policy or SHMA guidance. However, an objective of the Core Strategy is to locate the majority of new homes (including affordable homes) in sustainable locations close to public transport, services, facilities and employment. Principle towns fulfill a district wide role as service, employment and transport hubs. It is therefore considered that there will be a wide range of employment opportunities which will be accessible to future residents in Ilkley, including those living in affordable housing. The affordable housing targets in Policy HO11 will be reviewed in light of the NPPF and Local Plan Viability Assessment.</p> |
| | <p>12. Object to the need to provide 40%</p> | <p>Objection noted. The plan must meet the full needs for market and</p> |

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| | <p>affordable housing in Menston when there are no jobs here. People will have to commute to work. Build affordable homes in areas where there are new job opportunities. If the city centre needs revitalising the create jobs and new homes there.</p> | <p>affordable housing within the housing market area. The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. Policy HO11 aims to deliver this target through a variety of measures including through developer contributions for affordable housing. The targets in HO11 Part D are based on housing need, affordability, and economic viability. An objective of the Core Strategy is to locate the majority of new homes in sustainable locations close to public transport, services, facilities and employment. The majority of new homes (including affordable homes) proposed are in the Regional City of Bradford and the principle town of Keighley. Menston is proposed as a Local Growth Centre and is located along a key public transport corridor. It is considered that there will be a wide range of employment opportunities, which will be accessible to future residents in Menston, including those living in affordable housing. The affordable housing targets will be reviewed in light of the NPPF and Viability Assessment.</p> |
| | <p>13. Menston - Affordable housing is to be welcomed but not at the level of 40 per cent, and 70 per cent for social rent. There is limited local employment. Bus services from Menston to places of employment and services are poor. The rail service is excellent</p> | <p>Comment noted. The plan must meet the full needs for market and affordable housing within the housing market area. Policy HO11 is based on evidence of housing need identified in the SHMA. Policy HO11 allows for the viability and evidence of evidence of local need to be taken account of in the determination of the final tenure split to be delivered. An objective of the Core Strategy is to locate the</p> |

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| | but over capacity at peak times. | majority of new homes (including affordable homes) in sustainable locations close to public transport, services, facilities and employment to minimise impacts on the road network. It is considered that there will be a range of employment opportunities, which will be accessible to future residents in Menston, including those living in affordable housing. The targets in Policy HO11 will be reviewed in light of the of the NPPF and Local Plan Viability Assessment |
| 2. Affordable housing viability | 1. There is no sensible plan for this - Bradford MDC will not pay for it; the developers will not want to build it; nobody can afford to build it in Ilkley. | Policy HO11 sets out that developers will be expected to provide affordable housing through developer contributions. In accordance with national planning policy, Policy HO11 has been subject to a full financial viability analysis. The results of the AHEVA have been reflected in Policy HO11. The results indicate that up to 40% affordable housing on residential schemes is viable in Wharfedale. In accordance with national planning policy, policy HO11 is not unduly rigid and allows for the viability and circumstances of individual sites to be taken account of in the determination of the affordable housing contribution being sought. |
| | 2. Support the recognition in Policy HO11 (D) and (H) of the need for affordable housing requirements to be subject to economic viability. | Comments of support noted. |
| | 3. The economic viability of affordable housing provision will vary greatly across the | Comments noted. |

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| | District and between different sites. Therefore requirements for affordable housing must be assessed on a case by case basis. This is recognised in section D and H of policy HO11. | |
| | 4. Support for the inclusion of part H which refers to individual site and market condition, but concerned with the inclusion of the percentages referred to in the policy. However, support is given to the inclusion of the words “up to” within the policy which means that for the rest of the district, the Council would support proposals for between 0 – 30%. To ensure the supporting text reflects the policy, we request the inclusion of the words “up to” next to the relevant percentages | Comment noted. Policy HO11 is based on robust evidence and data, including the SHMA and AHEVA. These evidence base documents were prepared in accordance with national planning policy and guidance. It is considered Policy HO11 achieves the correct balance between allowing development to occur, whilst meeting the housing need of the district. The targets and supporting text in Policy HO11 will be reviewed in light of the NPPF and Viability Assessment. |
| 3. Affordable housing – Affordability | 1. Affordable housing is a bit of a con because although the price is helped down for the first purchase, later it can be sold on at normal market levels. i.e. it is no longer ‘affordable’ housing. The affordable houses just become bijou houses for the wealthy. | National planning policy states affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. |
| | 2. Affordable housing in Ilkley may well be totally unaffordable for someone from Little | Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs |

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| | Horton. | are not met by the market. Social rented housing rents are determined through the national rent regime. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent. Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels. |
| | 3. It is commendable that Bradford should place great emphasis on Affordable Housing, in line National Policy. It would be even more commendable if it were to acknowledge the major flaw in this area. In too many cases Affordable Housing is only that for the first buyer or occupier after which it can then enter the market housing sector. | \Comment noted. Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. National planning policy states affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. |
| | 4. Affordable housing means housing lived in by young people with families and as there is virtually no work to be had in Addingham, this would necessitate people travelling to the large towns and cities and would impose an extra pressure on the transport systems which are already overloaded. It would also be of prohibitive cost to the travellers | Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. To be considered sound the plan must meet the full needs for market and affordable housing within the housing market area. Commuting costs have not been directly taken into account when setting policies to meet affordable housing need as there is no basis for this in national planning policy or SHMA guidance. However an objective of the Core Strategy is to locate the majority of new homes (including affordable homes) in sustainable locations close to public transport, services, facilities and employment to minimise impacts on the road network. |

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| | <p>5. Bradford needs affordable housing. The proposed plans for Menston include hardly any affordable housing. Would so called “affordable” be really affordable? The extra cost of commuting need to be considered.</p> | <p>The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. Policy HO11 aims to deliver this target through a variety of measures including through developer contributions for affordable housing. Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Social rented housing rents are determined through the national rent regime. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent. Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels. Commuting costs have not been directly taken into account when setting policies to meet affordable housing need as there is no basis for this in national planning policy or SHMA guidance. However, an objective of the Core Strategy is to locate the majority of new homes (including affordable homes) in sustainable locations close to public transport, services, facilities and employment.</p> |
| | <p>6. The proposed new houses in Burley in Wharfedale will be unaffordable for ordinary young local people.</p> | <p>Comment noted. Policy HO11 aims to deliver affordable housing through a variety of measures, including through developer contributions for affordable housing. Policy HO11 requires up to 40% affordable housing on schemes of greater than 5 dwellings in Wharfedale to help meet the overall need for affordable housing.</p> |
| | <p>7. Houses built in villages are not “affordable” to first time buyers.</p> | <p>Policy HO11 aims to deliver affordable housing through a variety of measures, including through developer contributions for affordable housing. Policy HO11 sets out the requirement for the proportion of</p> |

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| | | affordable housing on schemes of greater than 15 dwellings. The site size threshold is lowered to 5 dwellings in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden, and Cottingley. Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Social rented housing rents are determined through the national rent regime. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent. Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels. |
| | 8. Given the diversity of the Bradford area, what constitutes affordable housing in one district does not necessarily compare with affordable housing in another district. | Comment noted. See Council's response above. |
| | 9. There is no way that the overwhelming majority of people in Bradford will be able to afford the type of housing that will be built in Ilkley. | To be considered sound the Plan must meet the full needs for market and affordable housing within the housing market area. Policy HO11 aims to deliver affordable housing through a variety of measures, including through developer contributions for affordable housing. Policy HO11 requires up to 40% affordable housing on schemes of greater than 5 dwellings in Wharfedale to help meet the overall requirement for affordable housing. Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Social rented housing rents are determined through the |

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| | | <p>national rent regime. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent.</p> <p>Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels.</p> |
| | <p>10. While we support mixed housing development to include affordable housing, it is unrealistic to suggest that accessible employment can be created to meet the needs of the occupants of 200 (40%) of the proposed new houses. Some small increase in local employment in Burley in Wharfedale could reasonably be envisaged but otherwise residents of affordable housing would be faced with unaffordable commuting to Leeds or Bradford. Include affordable housing but relate the number of those houses to employment opportunities in the immediate or close-by areas, assuming two employable persons per household</p> | <p>Comment noted. Policy HO11 is based on robust evidence and data, including the SHMA and AHEVA. Local employment opportunities and commuting costs have not been directly taken into account when setting policies to meet affordable housing need as there is no basis for this in national planning policy or SHMA guidance. However, an objective of the Core Strategy is to locate the majority of new homes (including affordable homes) in sustainable locations close to public transport, services, facilities and employment. Burley in Wharfedale is proposed as a Local Growth Centre located along key public transport corridor. It is considered that there will be a wide range of employment opportunities, which will be accessible to future residents in Burley, including those living in affordable housing. The affordable housing targets in Policy HO11 will be reviewed in light of the NPPF and Local Plan Viability Assessment.</p> |
| | <p>11. Are all or some or a small amount going to be social housing? If so, why would these want to be on the outer edges of the city? The costs of getting anywhere would be drastically increased in order to visit family, friends or anywhere else in the city for that matter.</p> | <p>To be considered sound the plan must meet the full needs for market and affordable housing within the housing market area. Part D of Policy HO11 sets out the requirement for the proportion of affordable housing on housing schemes. The Council's preferred tenure mix of 70 : 30 social rent : intermediate will be the starting point for all affordable housing negotiations. Commuting costs have</p> |

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| | | not been directly taken into account when setting policies to meet affordable housing need as there is no basis for this in national planning policy or SHMA guidance. However, An objective of the Core Strategy is to locate the majority of new homes (including affordable homes) in sustainable locations close to public transport, services, facilities and employment. |
| | <p>13. Concerns about the proposed types of housing - affordable (to be commended) but a large proportion of housing for social rent? Is Menston the right area for it? - Where there isn't much employment and it is an expensive area in which to live. We do need more sheltered housing and affordable residential homes in the area but I don't suppose the developers would be interested.</p> | <p>The Council's preferred tenure mix of 70 : 30 social rent : intermediate will be the starting point for all affordable housing negotiations. However the exact mix of affordable housing in terms of size, type and tenure will have regard to the evidence of the SHMA and any other relevant, robust and up to date evidence of local needs. It is considered that there will be a wide range of employment opportunities, which will be accessible to future residents in Menston, including those living in affordable housing. The provision of specialist accommodation especially for older people is supported in suitable locations and in areas of greatest anticipated demand through policy HO8 Housing Mix.</p> |
| | <p>14. There are no jobs in this area (Ilkley) for people who need affordable housing. Affordable housing should be built in Bradford and Keighley where brownfield sites are available to be developed where people are working.</p> | <p>To be considered sound the plan must meet the full needs for market and affordable housing within the housing market area. An objective of the Core Strategy is to locate the majority of new homes (including affordable homes) in sustainable locations close to public transport, services, facilities and employment. The majority of new homes proposed are in the Regional City of Bradford and the principle town of Keighley. Ilkley is proposed as a principle town in the settlement hierarchy. Principle towns fulfill a district wide role as</p> |

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| | | service, employment and transport hubs. It is therefore considered that there will be a wide range of employment opportunities which will be accessible to future residents in Ilkley, including those living in affordable housing. |
| | 15. Affordable houses to be built in this (Carrbottom Road) area will not be affordable | Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Social rented housing rents are determined through the national rent regime. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent. Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels. |
| | 17. What does “affordable” actually means. Affordable to whom? To buy, or rent through housing associations etc? | Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Social rented housing rents are determined through the national rent regime. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent. Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels. |
| 4. Affordable housing offsite contributions | 1. Affordable housing is just another way used by councils to make money out of planning constraints because developers end up paying a penalty to get out of the affordable housing requirement. | Comment noted. Policy HO11 states affordable housing should be provided on site unless there are exceptional circumstances which warrant off-site contributions. Any off site contribution will be in lieu of on site contributions and will be set out through a Section 106 agreement. |
| | 2. Object to the lack of reference to the | Objection noted. In accordance with national policy, Policy HO11 |

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| | potential role of offsite provision in lieu of on site provision. The role of off site contributions to affordable housing delivery is enshrined in national policy. Policy HO11 as drafted is silent on this matter is missing an opportunity to provide local policy support for off-site delivery solutions that may in incidences be preferable to onsite provision. Include reference to role of off-site contribution to affordable housing | states that affordable housing should be provided on site unless there are exceptional circumstances which warrant off-site contributions. This is set out in the supporting text and Part H of policy HO11. It is considered that Policy HO11 achieves the correct balance between allowing development to occur, whilst meeting the housing need of the district. Policy HO11 will be reviewed in light of the NPPF and Viability Assessment. |
| 5. Affordable housing need | 1. Young people in Ilkley do need affordable housing to enable them to return to live in Ilkley near their families after they return from University. Ilkley needs young people and young people will not stay if there is no affordable housing. | Comment noted. |
| | 2. As far as we've been led to believe the requirement is for more affordable housing whereas houses built in this area (Idle and Thackley) would attract a much higher value and therefore renders the objective null and void. | The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. Policy HO11 aims to deliver this target through a variety of measures including through developer contributions for affordable housing. Policy HO11 requires up to 30% affordable housing on schemes of greater than 15 dwellings in the Idle and Thackley Ward to help meet the overall requirement for affordable housing. |
| | 3. Any new build properties should be aimed | Comment noted. Agree that there is a need for affordable housing; |

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| | <p>at young families and first time buyers; properties in Wilsden tend to be more expensive thus pricing these groups out of the equation. Even young people born and raised in the village can't afford to buy their own properties here and are forced to move away to find affordable housing.</p> | <p>however it would be unsound to require all new housing to be aimed at young families and first time buyers. To be considered sound the Local Plan must meet the full needs for market and affordable housing within the housing market area. The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. Policy HO11 aims to deliver this target through a variety of measures including through developer contributions for affordable housing. Policy HO11 requires up to 30% affordable housing on schemes of greater than 5 dwellings in Wilsden to help meet the overall requirement for affordable housing.</p> |
| | <p>4. In the present and predicted economic climate the housing market has declined. It is difficult to get a mortgage to buy a house in the Wildsen area. Housing here is no longer affordable. Why build more?</p> | <p>Comment noted. To be sound the plan must meet the full needs for market and affordable housing within the housing market area. The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. Policy HO11 aims to deliver this target through a variety of measures including through developer contributions for affordable housing. Policy HO11 requires up to 30% affordable housing on schemes of greater than 5 dwellings in Wildsen to help meet the overall requirement for affordable housing.</p> |
| | <p>5. The development of another estate of 3-5 bedroomed detached houses with a small number of token 'affordable houses' does not do anything to address the local need for housing.</p> | <p>Noted. The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. Policy HO11 aims to deliver this target through a variety of measures including through developer contributions for affordable housing. Policy HO11 requires percentages of affordable housing on schemes to help meet the overall requirement for affordable</p> |

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| | | housing. |
| | 6. Even if the population figures are to be accepted it is another thing to assert large numbers of unaffordable houses should be built in Silsden. Affordable housing is far more likely to be taken up on brownfield sites close to Bradford. | Noted. To be considered sound the plan must meet the full needs for market and affordable housing within the housing market area. The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. In accordance with national planning policy the plan should set policies for meeting affordable housing need on site. Policy HO11 aims to deliver affordable housing through a variety of measures, including through developer contributions for affordable housing. An objective of the Core Strategy is to locate the majority of new homes (including affordable homes) in sustainable locations close to public transport, services, facilities and employment. The majority of new homes proposed are in the Regional City of Bradford and the principle town of Keighley. |
| | 7. Object to 400 homes in Addingham but support for limited development of affordable houses for local people | Objection Noted. To be considered sound the plan must meet the full needs for market and affordable housing within the housing market area. The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. Policy HO11 requires percentages of affordable housing on schemes to help meet the overall requirement for affordable housing. |
| | 8. The council has decided that small sites need no affordable housing. It therefore follows that bigger affordable housing | It is considered Policy HO11 is based on robust evidence and data, including the SHMA and AHEVA, which have been prepared in accordance with national policy and guidance. Commuting costs |

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| | <p>developments require bigger sites to be made available. This inevitably results in more affordable housing being allocated outside the city, as the larger undeveloped pieces of land are on the outskirts. This is totally illogical. It ignores the cost of commuting to work, which can be a major part of a person's income. The report assumes that the Council's financial viability model of affordable housing actually delivers what residents need, which it clearly ignores. The assessment is seriously flawed, as it only looks at the value to council. It doesn't look at the cost to the resident of living there, which must be a key point.</p> | <p>have not been directly taken into account when setting policies to meet affordable housing need as there is no basis for this in national planning policy or SHMA guidance. However an objective of the Core Strategy is to locate the majority of new homes (including affordable homes) in sustainable locations close to public transport, services, facilities and employment to minimise impacts on the road network. Part E of policy HO11 states affordable housing will be required on sites of 15 dwellings or more and sites over 0.4 hectares. The threshold is lowered to 5 dwellings in Wharfedale, and certain villages. The thresholds have been informed by the SHMA and economic viability in accordance with national policy.</p> |
| | <p>9. There is nothing in the document that matches the type of potential housing needed to the LDF proposals e.g. how many low income homes are needed, where and when?</p> | <p>The SHMA is a key element of the evidence base. It provides an analysis of the housing market in Bradford including the types of housing needed in different areas and affordable housing need. Policy HO11 sets out the plan's approach to delivering affordable housing through a variety of measures, including through developer contributions for affordable housing. Policy HO8 sets out the plan's approach to housing mix.</p> |
| | <p>10. Any new housing should be high density, affordable and energy efficient. People with the most urgent housing need often cannot afford to buy, and so social housing and</p> | <p>Comment noted. To be sound the Plan must meet the full needs for both market and affordable housing within the housing market area. Policy HO11 aims to deliver affordable housing through a variety of measures, including through developer contributions for affordable</p> |

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| | <p>housing co operatives should be given more consideration</p> | <p>housing. Part G of Policy HO11 states that the Council's preferred tenure mix, of 70 : 30 social rent : intermediate will be the starting point for all affordable housing negotiations. The amount of affordable housing required is based on housing need identified in the SHMA and the economic viability of delivering affordable housing. It is considered that Policy HO11 achieves the correct balance between allowing development to occur, whilst meeting the housing need of the district.</p> |
| | <p>11. It is not enough to hear a reason being given that 'we must build this new development because there is a lack of affordable housing'. Back it up please, with some data to show it.</p> | <p>Comment noted. To be considered sound under national planning policy the Local Plan must meets the full, objectively assessed needs for market and affordable housing in the housing market area. Policy HO11 is based on robust evidence and data, including the SHMA and AHEVA. These evidence base documents were prepared in accordance with national planning policy and guidance. The Bradford SHMA concluded that Bradford District can be considered as a self contained housing market area. The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. Policy HO11 requires percentages of affordable housing on schemes to help meet the overall requirement for affordable housing.</p> |
| | <p>12. We have not seen anywhere a well argued paper with appropriate facts to justify the current Council Policy for Wharfedale other than the economic one. It is therefore requested that the current requirement for the</p> | <p>Noted. It is considered Policy HO11 is based on robust evidence and data, including the SHMA and AHEVA. These evidence base documents were prepared in accordance with national planning policy and guidance. To be considered sound the plan must meet the full needs for market and affordable housing within the housing</p> |

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| | <p>quantity and character of all future Affordable Homes in Wharfedale be reviewed on a sensible pragmatic basis that makes sustainable sense for the new residents, recognises the need to be living in Wharfedale and is fair and sustainable for the local communities.</p> | <p>market area. Policy HO11 aims to meet the district's housing need through a variety of measures including through developer contributions for affordable housing. The targets in Part D are based on housing need, affordability ratios, potential land supply and economic viability. This is set out in the Core Strategy background and justification section for Policy HO11. The affordable housing targets in Policy HO11 will be reviewed in light of the NPPF and Local Plan Viability Assessment.</p> |
| | <p>13. The evidence in the SHMA and the AHEVA shows that homes built in Wharfedale will not be accessible to those people in the district who genuinely need affordable housing.</p> | <p>The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. Policy HO11 aims to deliver this through a variety of measures including developer contributions for affordable housing. Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Social rented housing rents are determined through the national rent regime. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent. Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels.</p> |
| | <p>14. The SHMA shows that Wharfedale is not where additional housing is needed. It notes on page 51 that even property developers consulted on the matter acknowledged that the primary need for housing is in central areas of Bradford where there is currently a</p> | <p>To be considered sound the Plan must meet the full needs for market and affordable housing within the housing market area. The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. An objective of the Core Strategy is to locate the majority of new homes (including affordable homes) in sustainable locations close to public transport,</p> |

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| | lack of supply and the need for more family housing, particular for the BAME community. | services, facilities and employment. The majority of new homes are proposed in the Regional City of Bradford and the principle town of Keighley. Policy HO8 sets out the Council's approach to delivering an appropriate mix of housing and identifies strategic priorities. Part D of policy HO8 sets out the strategic priority of increasing the supply of larger homes across the district in particular in areas suffering from high levels of overcrowding. |
| 6. Affordable housing delivery | 1. There has been an aspirational figure of 40% of Affordable Housing in Wharfedale for some 20 years – in the UDP, then RUDP, but hardly a fraction of that has ever been realised. Bradford has never shown any will, ability or policy to enforce developers to build a significant number of Affordable Homes in the Valley. What has been built has been distinctly unaffordable or expensive executive housing. That is set to continue. | Affordable housing is negotiated on a site by sites basis and secured through legal S106 agreements and monitored through the AMR. Policy HO11 aims to deliver affordable housing through a variety of measures, including through developer contributions for affordable housing. Part D of Policy HO11 sets out the requirement for the proportion of affordable housing on residential schemes |
| 7. Affordable housing tenure | 1. Policy HO11 in the Core Strategy whilst also applying a percentage approach doesn't inform on whether or not the Council aims to continue with the discount approach currently practiced. If that is not the case and the Council intends to move towards the more conventional method of transfer agreement between the RSL and the developer, the | It is not considered appropriate to set out the details of the council's policy in terms of transfer values for affordable housing in the Core Strategy as this is a strategic planning document. Policy HO11 is based on robust evidence and data, including the SHMA and AHEVA. These evidence base documents were prepared in accordance with national planning policy and guidance. Policy HO11 will be reviewed in light of the NPPF and Local Plan Viability Assessment. |

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| | <p>policy and justification text fails to inform what level of transfer value per m² / ft² would be.</p> <p>The tenure split 70:30 appears to ignore affordable rent which again would require a further transfer value to be considered. We have viewed the Viability Appraisal (AHEVA) and again have found no reference to transfer values.</p> | |
| 8. Affordable housing tenure mix | <p>1. The tenure split 70:30 appears to ignore affordable rent which again would require a further transfer value to be considered.</p> | <p>Noted. The Council's preferred tenure mix of 70 : 30 social rent : intermediate will be the starting point for all affordable housing negotiations. The exact mix of affordable housing in terms of size, type and tenure will have regard to the evidence of the SHMA and any other relevant, robust and up to date evidence of local needs. The tenure mix in Policy HO11 will be reviewed in light of the NPPF and Viability Assessment.</p> |
| | <p>2. Policy HO11 Part G - The requirement for a preferred tenure mix of 70:30 social rent : intermediate tenure mix should be applied flexibly. Enabling the mix of affordable tenure to be determined on a site by site basis will enable schemes to take into account the impact of respective tenures on economic viability and allow the mix to respond to specific local market demand and RSL requirements</p> | <p>Agree that the tenure split should be determined on a site by site basis. This is reflected in Part G of Policy HO11. Policy HO11 allows for the viability and evidence of evidence of local need to be taken account of in the determination of the final tenure split to be delivered.</p> |

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| <p>9. Affordable housing Sub Area policy percentages</p> | <p>1. Objection to 29% affordable housing on units of 15 and above.</p> | <p>Objection noted, however the policies within the sub area section of the Core Strategy indicate the quantum of affordable homes expected to be delivered and what proportion of the total number of new homes in that sub area this represents. Part D of Policy HO11 sets out the required developer contributions for affordable housing on residential schemes. Policy HO11 will be reviewed in light of the of the NPPF and Local Plan Viability Assessment</p> |
| <p>10. Affordable Housing – Wilsden</p> | <p>1. Housing here is no longer affordable. Why build more?</p> | <p>To be considered sound the Plan must meet the full needs for market and affordable housing within the housing market area. Policy HO11 aims to deliver affordable housing through a variety of measures, including through developer contributions for affordable housing. Policy HO11 requires up to 30% affordable housing on schemes of greater than 5 dwellings in Wildsen to help meet the overall requirement for affordable housing.</p> |
| | <p>2. Are there any guarantees that any building will be classed as affordable in Wilsden.</p> | <p>Policy HO11 aims to deliver affordable housing through a variety of measures, including through developer contributions for affordable housing. Policy HO11 requires up to 30% affordable housing on schemes of greater than 5 dwellings in Wildsen to help meet the overall requirement for affordable housing.</p> |
| | <p>3. There is a need for affordable homes for first time buyers in Wilsden. Houses in the suburbs attract higher prices so this plan does not solve the problem.</p> | <p>The Bradford SHMA estimates housing need across the District. The SHMA identified a need for affordable housing in the district and an overall district-wide affordable target of 25%-30%. Policy HO11 aims to deliver affordable housing through a variety of measures, including through developer contributions for affordable housing.</p> |

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| | | Policy HO11 requires up to 30% affordable housing on schemes of greater than 5 dwellings in Wildsen to help meet the overall requirement for affordable housing. |
| | 4. If new developments are built some of them have to be affordable housing this is not in line with some of the houses in Wildsen. | Comment noted. See Council's response to comment 1 above. |
| | 5. Objection in relation to affordability – house prices will be out of reach for many who really need them | Objection noted. See Council's response to comment 1 above. |
| | 6. Objection in relation to affordability. The need is for affordable homes to rent not buy | Objection noted. See Council's response to comment 1 above. The Council's preferred tenure mix of 70 : 30 social rent : intermediate will be the starting point for all affordable housing negotiations. |
| | 7. Objection. The houses proposed are not going to be affordable and are therefore unsustainable | Objection noted. See Council's response to comment 1 above. |
| 11. Supporting evidence – SHMA | 1. Query some of the modelling and calculations used in the underpinning research. Some of the assumptions seem problematic. It seems implausible the number of households requiring affordable housing will rise at the predicted rate | Comment noted. It is considered that the Core Strategy is based on robust evidence and data, including the SHMA. The SHMA was prepared in accordance with national planning policy and guidance. |
| | 2. There appears to be inconsistencies in the figures given at different points in the | Comment noted. See Council's comment above. |

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| | document. As it stands, the data in this report does not appear to be a sound basis upon which to plan housing development. | |
| Policy HO12 – Gypsies, Travellers and Travelling Showpeople | | |
| 1. Policy HO12 | 1. Concerns that the criteria relating to avoiding affects on the environment and adjacent land uses may be counter productive. | The reasons for this concern are not set out so it is difficult to respond. It is suggested that this is an entirely reasonable criteria by which to judge both potential allocations and planning applications. |
| | 2. The council should also be mindful that the main barrier to the construction of Traveller sites is public and official prejudice. It should avoid drafting any criteria which may present an open invitation invite NIMBY objections which may well be based on prejudice. | This comment is neither explained nor justified. Nor is it clear what part of the policy if any is being referred to and why. Planning policies should be clearly worded and provide justified guidance. There is nothing within the policy which would encourage Nimbi attitudes based on prejudice. |
| | 3. The core strategy makes no mention of updating the GTAA - this should in our view be planned for and mentioned in the text. | The text has been amended to reflect the need to update the GTAA. |
| | 4. Concern over the decision not to have a rural exceptions policy. Gypsies and Travellers have problems in finding affordable land for their needs and that they may perforce have to resort to rural and semi-rural locations to meet their needs. Any further | Amendments have been made to incorporate rural exceptions within the policy. |

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| | developed criteria should take this into account and ensure that the possibility of developing small family oriented sites in rural or semi-rural locations is allowed for | |
| | 5. Point C needs to include flood risk in the criteria. PPS25 sets out that caravans used for permanent residential accommodation are highly vulnerable to flood risk which should be acknowledged in this policy. We are satisfied that Travellers do not need to be specifically mentioned in policy EN7, providing that traveller sites are understood to be included under the umbrella of 'development'. | The Council acknowledges these points and has made an appropriate amendment accordingly. |

SECTION 5: PLANNING FOR PLACE- ENVIRONMENT

| Policy EN1 – Protection of Recreation Open Space and Urban Greenspace | | |
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| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. General comments of support | | Comments of supported noted. |
| 2. Recognise the importance of recreational routes | | Comment noted. This issue addressed in text amendment and policy SC6. |
| 3. Put more emphasis on importance of biodiversity | | Comment noted. This issue addressed in references to natural greenspace and policy SC6. |

Policy EN2 – Biodiversity and Geodiversity

| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
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| 1. General comments of support | | Comments of supported noted. |
| | Support for local wildlife sites and wildlife conservation | Comments of supported noted. |
| 2. Importance of connectivity in relation to river corridor | | Comment noted. This issue referenced in text amendment |
| 3. Promote the creation, extension and better management of priority habitats identified in local/national biodiversity action plans | | Comment noted. This issue addressed in text and policy amendment |
| 4. The balance of protection in relation to third tier sites is queried | | Comment noted. This issue addressed in policy amendment. |
| 5. Identify targets for new habitat creation | | Comment noted. Minor amendment. |
| 6. Include more information about protected sites | | Comment noted. Issue addressed in text amendment. |
| 7. Support for identifying buffer areas next to protected local wildlife sites | | Comment noted. Issue addressed in policy amendment. |

| Policy EN3 – Historic Environment | | |
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| SUMMARY OF MAIN ISSUE RAISED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Support for the protection of the built historic environment. | | The comments of support are noted. |
| 2. Changes to National & Regional planning policy | Policy EN3 should be reassessed in light of the publication of the National Planning Policy Framework (NPPF). | Agree. Policy EN3 has been reassessed and revised, where appropriate, in light of the publication of the NPPF document and comments received. |
| 3. Housing targets | The housing growth agenda is contradictory to Policy EN3 – Historic Environment. | There is a need to plan for growth over the next 15-20 years within the Bradford District. Bradford Council aims to accommodate this growth whilst protecting the intrinsic and unique value of the District's heritage. Policy EN3 will help to ensure that growth does not adversely affect the character and local distinctiveness of its buildings and settlements. |
| 4. Saltaire World Heritage Site | Suggested amendments to policy wording of EN3(A) and (B) relating to Saltaire World Heritage Site. | Comments noted. The suggested policy wording amendments has been assessed and where appropriate has been amended in light of comments received. |
| 5. Local distinctiveness | Policy EN3(C) needs to be more locally distinctive and include wider recognition of the range of locally distinctive heritage assets that contribute to the unique character of the District | Comments noted and agree. The policy wording has been revised to include wider recognition of the range of locally distinctive heritage assets that contribute to the unique character of the District |
| 6. Heritage & regeneration | Policy EN3 (D) wording relating to heritage | Comments noted. The policy wording has been reassessed and |

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| | and regeneration is too restrictive. | amended taking on board these comments. |
| 7. Monitoring and targets | English Heritage produces an annual 'Heritage at Risk' register which includes details of all the heritage assets at risk in Bradford. This data could be used as part of the monitoring, therefore amend list of targets in the table. | Agree, comments noted. |
| Policy EN4 – Landscape | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. General support | | Comments of support noted. |
| 2. Identify landscape character areas appropriate for restoration | | Comments noted. |
| Policy EN5 – Trees and Woodland | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. General support | | Comments of support noted. |
| 2. Encourage the planting of additional trees as part of development proposals | | Comments noted. Policy amended. |
| 3. Stronger protection for ancient and veteran trees is needed. | | Comments noted. Policy amended. |

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| 4. Concern about impact of Holme Wood Urban Extension on local belts of woodland | | Comments noted. |
| 5. Targets need to be set for woodland expansion and access | | Comments noted. Appendix added policy EN2. |
| 6. Concern about high level of flood risk in Keighley | | Comments noted. |
| 7. Policy is too prescriptive and not flexible enough | | Comments noted. Minor amendment. |
| Policy EN6 – Energy | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Need higher renewable energy target and more support for wind energy | | Comments noted. |
| 2. Objections to policies promoting wind turbines and farms | | Comments noted. None directly related to comment. |
| Policy EN7 – Development and Flood Risk | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. General support | | Comments of support noted. |
| | Support for importance of investigating all | Comments of support noted. |

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| | sources of flooding and need to investigate drainage infrastructure | |
| 2. Capacity of Aire Valley Trunk Sewer | | Comment noted. |
| 3. Greater sensitivity required in relation to flood defences and use of culvetting | | Comment noted. Policy amended. |
| 4. Make addition that Surface Water Management Plans are undertaken where necessary. | | Comment noted. Text amended. |
| 5. Need for sequential testing paper in relation to core strategy | | Comment noted. A Sequential testing paper has been prepared. |
| 6. Add criterion that all development proposals will only be acceptable where they do not increase flood risk elsewhere | | Comments noted. Policy amended. |
| 7. Stipulate that greenfield sites require greenfield run-off rates | | Comments noted. Policy amended. |
| 8. Concern about high level of flood risk in Keighley | | Comment noted. |
| 9. Locations should be identified for woodland creation to alleviate flooding | | Comment noted. |

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| 10. Capacity of Aire Valley Trunk Sewer | | Comment noted. |
| Policy EN8 – Environmental Protection | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. General support | | Comments of support noted. |
| 2. Groundwater should be specifically mentioned | | Comments noted. Policy amended. |
| 3. Amend title of sub-section D to water environment | | Comments noted. Policy amended. |
| 4. More emphasis needs to be put on Water Framework Directive and commitment to improvement in ecological status of water. | | Comments noted. Some amendment to Policy. |
| 5. Amend indicator for water quality to include no deterioration in ecological status of water bodies | | Comments noted. Indicator amended. |
| 6. Stronger stance in relation to minimising pollution where this affects environmental interests | | Comments noted. |
| 7. Amend policy wording to safeguard ground and surface | | Comments noted. Policy amended. |

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| water resources | | |
| 8. Amend land criterion to include unstable land and make reference to public safety in last clause | | Comments noted. Policy amended. |
| 9. Add to Water Framework Directive reference to ecology, return of migratory fish and support for improvements in fish passage. | | Comments noted. Text amended. |
| 10. Support for need to assess noise and nuisance, particularly in relation to wind turbines | | Comments noted. Minor amended. |
| Policy EN9 – New Minerals Extraction Sites | | |
| SUMMARY OF MAIN ISSUE RAISED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Impact of minerals extraction activities on the environment | Lack of consideration of environmental impacts in the general policy relating to minerals extraction sites | Given the comments made by Natural England and a review of the policies set out in the NPPF, it is considered appropriate to insert an addition criterion in sub-policies EN9(A) and EN9(B) in order to ensure that impacts on the natural environment outside of designated nature conservation sites remain a central concern of future minerals planning. It is not considered appropriate to impose a requirement that new minerals development should not result in any ecological harm, as new minerals development often results in unavoidable habitat loss arising from the excavation of new areas of |

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| | | <p>land. What is important is that new minerals development does not result in the loss of any irreplaceable habitats, or habitats which form a vital part of wider ecological networks and that any ecological loss is mitigated through high quality site restoration, resulting in net gains to biodiversity. Therefore the proposed additional criterion has been worded accordingly. It is not considered that the proposed changes to policy EN9 are likely to significantly affect the economic viability of future minerals extraction, as the stated environmental criteria are based upon NPPF paragraphs 117 and 118 and are therefore already material considerations in determining planning applications. The alterations therefore primarily just make the natural environment protection requirements contained within the NPPF more explicit within the Core Strategy DPD rather than being altogether new requirements.</p> |
| <p>2. Sequential test for new minerals extraction sites</p> | <p>Imposition of an onerous requirement for developers of new minerals extraction sites to demonstrate that the extension of all existing sites is unviable</p> | <p>It is considered that the additional wording proposed by the Minerals Products Association is an appropriate change and would make the policy more consistent with paragraph 145 of the NPPF, which indicates that planning authorities should ensure that large landbanks bound up in very few sites do not stifle competition.</p> <p>The District contains 11 active minerals extraction sites, several of which are worked very slowly or intermittently. There is potential for several of these existing minerals extraction sites to be extended; however due to the slow or intermittent rate of working such an extension would only take place an indeterminate time in the future.</p> |

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| | | <p>The previously drafted version of policy EN9 could potentially have prevented the opening up of any new minerals extraction sites within the District until reserves are exhausted at every single one of the 11 active extraction sites within the District (unless the proposed new mineral reserve had specific qualities which were not present within existing reserves). It is considered that this policy approach would have been anti-competitive and could have jeopardised the adequate supply of minerals products from the District.</p> <p>The proposed alternative wording of criteria EN9A(4)(i)&(ii) would only require that an applicant demonstrate that he has exhausted all opportunities for extending existing workings under his own control, which is considered to be a more reasonable approach. If the initial principle test for a new working set out in policy EN9 is passed then the proposal would still have to accord with the policy criteria for the individual minerals types set out in subsequent policies EN10 and EN11, which contain sufficient safeguards to ensure that unsustainable new minerals development is not permitted.</p> |
| <p>3. The impact of minerals extraction on groundwater resources</p> | <p>Lack of explicit commitment to assessing groundwater pollution risks when considering proposals for new minerals development</p> | <p>Giving consideration to the Environment Agency's comments and a review of NPPF and other Local Plan Policies it is proposed to insert an additional criterion in sub-policies EN9(A) and (B) explicitly stating that the acceptability of the full range of environmental effects from proposed new minerals development will be considered including from pollution, land stability risks, or harm to amenity, the setting of heritage assets or the character of the landscape. The</p> |

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| | | additional criterion also makes it clear that cumulative impacts will be considered and that the content of other more detailed development plan policies, setting out environmental criteria covering all types of development, will be taken into account. |
| Policy EN10 – Sandstone Supply | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL’S RESPONSE |
| 1. Impact of minerals extraction activities on the environment | Lack of consideration of environmental impacts in the sandstone supply policy and sandstone area of search | <p>Given the comments made by Natural England and a review of the policies set out in the NPPF, it is proposed to insert an additional criterion for policy EN10(E), in order to allow ecological considerations to play an enhanced role in the process of defining an area of search for building stone quarries. This additional criterion is intended to respond to the concerns expressed by Natural England that the draft minerals policies did not include sufficient consideration of ecological issues.</p> <p>Criterion EN10(E)(3) will allow areas to be excluded from the area of search, which will be defined through the new Proposal Map accompanying the Allocations DPD, if it is considered that further minerals development in those areas would be likely to lead to the loss or significant deterioration of any irreplaceable habitats, or to the permanent disruption of a significant ecological network.</p> <p>In terms of implementing this criterion an assessment will be made of whether any parts of the geological resource area within the District contain irreplaceable habitats or provide structures which</p> |

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| | | form part ecological networks which should be protected from further minerals development during the process of drawing up the Area of Search within the Allocations DPD. Further consultation will take place with Natural England at this point to ascertain if they consider that the criterion is being correctly applied. |
| 2. Supporting the economic viability of building stone quarries | Restricting the ancillary production of aggregates at building stone quarries | In order to respond to the concerns expressed by the Mineral Products Association, it is proposed to revise sub-policy ENV10(D) to remove the requirement to minimise aggregate production, providing certain criteria are met. However the criteria in the revised policy still ensure that aggregate production would not be permitted at a level which would prejudice the achievement of the policy objectives of safeguarding building stone reserves, protecting markets for RSA and ensuring appropriate site restoration. It is therefore considered that the proposed revisions are an appropriate compromise between the economic interests of the building stone industry and the policy imperative of taking account of the contribution that substitute or secondary and recycled materials and minerals waste can make to the supply of materials, before considering extraction of primary materials (NPPF para 143). |
| 3. Commitment to contributing towards a sub-regional aggregates landbank | 1. Failure to support the production of building sand from sandstone resources within the District | It is acknowledged that the FE Draft version of policy EN10 did not provide appropriate support for the production of building sand from sandstone reserves within the District. It is therefore proposed to insert criteria EN10(C)(2)(ii) and EN10(D)(3)(ii) supporting aggregate production where the primary product would be building sand. |

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| | <p>2. Failure to specifically commit to contributing towards a sub-regional crushed rock aggregates apportionment within policy EN10</p> | <p>In order to respond to the concerns expressed by the Mineral Products Association, it is proposed to revise sub-policy EN10(C) to adopt a less negative form of wording and specifically refer to the need to maintain an appropriate sub-regional landbank. As explained above it is not considered appropriate to specify a figure for the level of apportionment which will be met from the Bradford District in sub-policy EN10(C). The approach of instead inserting the reference to the landbank calculated within the annual LAA in policy EN10(C) will make the sub-policy more flexible and reactive to changes in market demand and permitted reserve levels than would be the case if fixed aggregate provision figure was specified in the policy. The production of a single LAA covering all of the Unitary Authorities within West Yorkshire is consistent with the previous sub-Regional divisions and allows for the future supply of aggregates to be planned over a meaningful spatial scale.</p> <p>Additional criteria, specifying situations where primary crushed rock aggregate quarries would be allowed have also been proposed. Additional criterion EN10(C)(2)(i) expressly allows the development of new quarries primarily intended to produce crushed rock aggregates if the LAA indicates that additional provision is required. Additional criterion EN10(C)(2)(ii) specifically indicates that quarries intended primarily to produce building sand will be allowed. This second additional criterion reflects the representations made during the consultation on the FE Draft that sandstones crushed down to sand can provide an appropriate substitute for building sand</p> |
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| | | <p>produced from relatively scarcer sand and gravel resources (further discussion of this issue is provided in the following section).</p> <p>The third criterion EN10(C)(2)(iii) is carried through from the FE Draft Policy with a slight re-wording to ensure that the potential for unmet demand to be supplied by Recycled or Secondary Aggregates (RSA) is considered. This criterion allows the development of a new crushed aggregate quarry, even if a need for additional permitted reserves is not identified in the LAA, in the scenario where a developer is claiming that new (non-sand) crushed rock aggregate reserves are a specific need can be demonstrated.</p> |
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| Policy EN11 – Sand and Gravel, Fireclay and Coal Supply | | |
| SUMMARY OF MAIN ISSUE RAISED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Impact of minerals extraction activities on the environment | Lack of consideration of environmental impacts in the sand and gravel, clay and hydrocarbon supply policy and sand and gravel area of search | Comment noted. See Council's reply to Policy EN10 – main issue number 1 above. |
| 2. Commitment to contributing towards a sub-regional aggregates landbank | Failure to specifically commit to contributing towards a sub-regional sand and gravel apportionment within policy EN11 | In order to respond to the concerns expressed by the Mineral Products Association, it is proposed to revise sub-policy EN11(A) to specifically refer to the need to maintain an appropriate sub-regional landbank. As explained above it is not considered appropriate to specify a figure for the level of apportionment which will be met from the Bradford District in sub-policy EN11(A). The approach of instead inserting the reference to the landbank calculated within the annual |

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| | | <p>LAA will make the sub-policy more flexible and reactive to changes in market demand and permitted reserve levels than would be the case if fixed aggregate provision figure was specified in the policy. The production of a single LAA covering all of the Unitary Authorities within West Yorkshire is consistent with the previous sub-Regional divisions and allows for the future supply of aggregates to be planned over a meaningful spatial scale.</p> |
| 3. Principles applying to proposals for coal extraction | 1. Omission of any forms of coal extraction other than opencast coal mining from sub-policy EN11(C) | <p>The intention was always for sub-policy EN11(C) to relate to all forms of coal extraction and therefore it is proposed to amend the wording of this sub-policy in line with the Coal Authority's suggestion.</p> |
| | 2. Imposition of an onerous requirement for developers to demonstrate an economic need for coal | <p>It is considered that the Coal Authority's concerns can be allayed, whilst still ensuring that permission is not granted for the extraction of low quality coal resources which would be of little value as an energy mineral, by re-wording criterion EN11(C)(2) in the manner proposed above. The proposed reworded criterion requires any developer intending to extract a surface coal resource within the District (other than prior extraction) to provide evidence that the coal is suitable for use as an energy mineral but no longer requires any sort of evidence of the economic need for coal.</p> <p>Criteria EN11(C)(3)&(4) have been carried through from the FE Draft version substantially unchanged but have been combined in one criterion in the interests of clarity. Criterion EN11(C)(4) has been subject to some minor rewording to reflect the fact that paragraph 149 of the NPPF now specifies that 'national' as well as</p> |

| | | local and community benefits should be taken account of in considering the acceptability of proposals for coal extraction (this was not previously the case in MPG3). |
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| Policy EN12 – Minerals Safeguarding | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Safeguarding of urban minerals resources | 1. Failure to safeguard minerals resources within urban areas from potentially sterilising surface development | Given the evidence of the viability of prior extraction within an urban setting, it is proposed to delete the text 'outside of Urban Areas' from sub-policy EN12(A); produce amended minerals safeguarding plan showing the total resource areas for Coal, Sandstone and Sand and Gravel unconstrained by urban areas |
| 2. Safeguarding of Sand and Gravel resources | 1. Failure to provide a buffer around safeguarding areas to account for potential sterilisation by proximal development | Disagree with comment - take no action. The addition of a buffer would take up to large land area (prejudicing the viability of other forms of development) and is inappropriate, given the relatively abundant nature of the resource. |
| 3. Safeguarding of Coal resources | 1. Failure to safeguard secondary and tertiary coal resources from potentially sterilising surface development | Given the evidence put forward by the coal Authority that the Secondary and Tertiary Coal resource may be viable for extraction, and the lack of contrary evidence, it is proposed to amend the Minerals Safeguarding Plan accompanying Policy EN12 to include safeguarding of secondary and tertiary resources. |
| | 2. Failure to safeguard coal resources within development sites comprising under 1 hectare of land from potentially sterilising surface development | To respond to the Coal Authority's concerns it is proposed to delete the reference to coal within sub-policy EN12(B), which has a 1ha threshold, and instead add coal safeguarding to sub-policy EN12(C), which applies the safeguarding policy to all major developments. |

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| | | <p>Furthermore, to allay the Coal Authority's fears that opportunities may be missed for prior extraction on minor development sites, it is proposed to insert the additional sub-policy EN12(F) which makes it clear that proposals for the prior extraction of coal will be supported in principle. Therefore, if a viable coal resource is discovered on a minor development site during the plan period, there will be a positive policy environment which will allow the developer to extract this coal resource as part of site preparation work. This policy, of encouraging, rather than requiring, minor developers to consider prior extraction, is considered to be proportionate and in line with the government's stated objective of not overburdening investment in business with the combined requirements of planning policy expectations (NPPF paragraph 21).</p> |
| Policy EN13 – Waste Management (WM1) | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Waste Reducation | Not enough being down to reduce waste | <p>The Council is committed to adopting the Waste Hierarchy which prioritises the prevention of waste as its primary objective. Policies EN13 and EN14 provide the strategic framework for the Waste Management DPD, which provides detailed guidance on planning for waste management for the next 15 – 20 years. The Council will also assist in the delivery of new waste management facilities for the treatment of residual waste, and assist in achieving movement up the waste hierarchy, through the allocation of sites within the Waste Management DPD.</p> |

| Policy EN14 – Identifying Waste Management Sites (WM2) | | |
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| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Waste Reduction | Not enough being done to reduce waste | The Council is committed to adopting the Waste Hierarchy which prioritises the prevention of waste as its primary objective. Policies EN13 and EN14 provide the strategic framework for the Waste Management DPD, which provides detailed guidance on planning for waste management for the next 15 – 20 years. The Council will also assist in the delivery of new waste management facilities for the treatment of residual waste, and assist in achieving movement up the waste hierarchy, through the allocation of sites within the Waste Management DPD. |

SECTION 6: IMPLEMENTATION & DELIVERY

| Policy ID1 – Development Plan Documents and Authority Monitoring Report | | |
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| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| None | None | N/A |

| Policy ID2 - Development Management | | |
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| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Support for Policy ID2 | Support for Policy ID2 in helping to achieve high quality design and enhancement of | Comments of support noted. |

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| | ecological and landscape features. | |
| 2. Support for Policy ID2 (E) | Support for ID2 (E) as it will support lowering carbon emissions in line with European and National targets. | Support Noted. |
| 3. Policy could be made more robust. | Policy EN7 “requires” developers to investigate the use of SuDS (the use of rain water and grey water recycling and sustainable drainage systems) this requirement should be within Policy ID2 rather than just stating to “encourage” it. | Comments noted. The wording of this policy has been amended to reflect these comments. |
| 4. Use of sustainable transport modes. | Reference should be made to the use of sustainable transport modes, public transport infrastructure and incentives to use public transport. A policy steer on the design and layout of developments to encourage public transport use should also be included. This is also an objective within LTP3. | Policy wording amended to reflect the comments. |
| 5. Retention and enhancement of ecological and landscape features. | The policy wording could be made more progressive by amending the wording to: “3. Retain and wherever possible, enhance important ecological and landscape features” | Policy working amended to reflect comments made. |

Policy ID3 – Developer Contributions

| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
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| 1. Community Infrastructure Levy (CIL) | Community Infrastructure Levy will not fill funding gap to ensure adequate infrastructure provision for future growth. | Comments noted. Community Infrastructure Levy will be just one source of funding which will go towards infrastructure projects in the District. The Council does not envisage Community Infrastructure Levy alone filling the infrastructure funding gap. No change to policy. |
| 2. Objection to ID3 | Objection based on wording of policy and justification of policy | Policy wording amended in response to comment and following the publication of NPPF and CIL regulations. |
| 3. Public transport infrastructure | The policy should make reference to public transport infrastructure. | Policy wording amended to reflect comments. |
| Policy ID4 – Working with Partners | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Support for Policy ID4 | Support expressed for Section 6.5 whilst highlighting to the Council the need for green infrastructure, arising from new development, redevelopment and the intensification of existing activities. | No change to policy. |
| 2. Local Infrastructure Plan | 1. The Local Infrastructure Plan Schedule will need updating to reflect the changed timetables for the M62 and M1 Managed Motorway Schemes | Comments noted. No change to policy. |
| | 2. Assistance offered by the Highways | The Council will continue to work closely with Highways Agency and |

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| | Agency & Metro in updating Local Infrastructure Plan Schedule and issues of scheme feasibility, deliverability and funding in the context of policies ID4 and ID5. | Metro under Duty to Cooperate on all matters relating to infrastructure planning. |
| 3. Infrastructure delivery | Suggested amendment to supporting text in paragraph 6.5.2. | Comment noted. No change to policy. |
| Policy ID5 – Facilitating Delivery | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Local Infrastructure Plan Schedule | 1. al Infrastructure Plan Schedule will need updating to reflect the changed timetables for the M62 and M1 Managed Motorway Schemes | Comments noted. No change to policy. |
| | 2.Highways Agency offering to assist in updating Local Infrastructure Plan Schedule and issues of scheme feasibility, deliverability and funding in the context of policies ID4 and ID5. | The Council will continue to work closely with Highways Agency under Duty to Cooperate on all matters relating to infrastructure planning. |
| 2. Infrastructure | Provision of infrastructure types as it relates to individual settlements | Comments relating to infrastructure will be taken into account as part of the Local Infrastructure Plan and Schedule. |
| Policy ID6 – Simplification of planning guidance to encourage sustainable development | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |

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| 1. The simplification of planning system must not allow development in areas that are not accessible to public transport | Development should not go ahead in areas that are not accessible by public transport or without adequate mitigation to bring public transport accessibility up to a reasonable level. In areas where growth is to be accelerated, it is essential that the necessary infrastructure improvements are also delivered. | Comments noted. No change to policy |
| ID7 – Community Involvement | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| None | None | N/A |
| ID8 – Regeneration Funding and Delivery | | |
| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. West Yorkshire Transport Fund (WYTF) | Metro and the LTP partners are currently devolving proposals for a West Yorkshire Transport Fund. It is anticipated that it will be in place during the plan period. If it does go ahead, it will be a major source of funding for transport infrastructure schemes. | Comments noted. No change to policy |

SECTION 7: MONITORING

| MONITORING | | |
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| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Table MO1 does not incorporate objectives-targets-indicators approach set out in the LDF Monitoring Good Practice Guide. | | The Good Practice Guide was withdrawn on 30 th March 2011. The monitoring framework of the plan has been revised to provide greater clarity. |

EVIDENCE BASE

| EVIDENCE BASE - SHMA | | |
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| SUMMARY OF MAIN ISSUE RASIED | SUB-ISSUE | COUNCIL'S RESPONSE |
| 1. Development of brownfield sites | 1. Some comments from Developers suggest strongly that the principal reason for opening the way for development on green field (and green belt) sites in Wharfedale is because developers would prefer to build there than to develop brown field sites in Bradford and Keighley. Allowing developers to dictate these terms runs contrary to Government guidance which clearly takes the position that brownfield sites should be prioritised for | Noted. The SHMA was produce in accordance with national planning guidance, a requirement of which is that it involves key stakeholders. The research therefore ensures that the views of a range of key stakeholders are represented in the study. Section 3 of the Core Strategy sets out how the Preferred Option has been arrived at. The housing distribution has been informed by a range of evidence, and this is set out in Policy HO3. |

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| | development over greenfield sites. | |
| | <p>2. It is reported that developers are arguing that land supply is an issue and that there are difficulties in bringing brownfield sites forward because of planning constraints. The developers are then reported as saying that: 'there is a need to bring forward unconstrained sites in good market areas such as those in outlying villages and towns.' This statement is included in the document without criticism or comment. Despite the fact that from statements elsewhere in the research it is apparent that developers have abandoned projects on urban sites for which planning permission has been granted and where work has begun.</p> | <p>Noted. The SHMA was produce in accordance with national planning guidance, a requirement of which is that it involves key stakeholders. The research therefore ensures that the views of a range of key stakeholders are represented in the study.</p> |
| 2. Modelling & calculations | <p>Queries relating to some of the modelling and calculations used in the underpinning research. We have not had time to undertake a proper analysis but some of the assumptions seem problematic.</p> | <p>Noted. It is considered that the Core Strategy is based on robust evidence and data, including the SHMA. The SHMA was prepared in accordance with national planning policy and guidance.</p> |

APPENDIX 7: LIST OF SUPPLEMENTARY CONSULTATION REPORT DOCUMENTS

8.1 This Statement of Consultation collates all this information into one place to provide an overview of the entire consultation process for the Further Engagement Draft consultation stage. A list of the supplementary consultation documents is provided below as a reference:

- Technical Events Consultation Log
- Planning Aid England Consultation Events Log

APPENDIX 8: EQUALITY AND DIVERSITY MONITORING FORMS RESULTS

| Equality & Diversity Monitoring Form - Feedback Results | | | | | | | | | | | | | | | | | | |
|---|---------------|--------------------|--------------------|---------------------------------|------------------------|---------------------|---------------------------|------------------------------|----------------------------------|--------------------|-----------------|----------------|-------------------|--------------------|--------------------|-----------------------|------------------------------------|-------|
| QUESTION | OPTIONS | TECHNICAL EVENTS | | | | | | AREA EVENTS | | | | | | | | | Form submitted with Representation | TOTAL |
| | | Economy 17.11.2011 | Housing 18.11.2011 | Transport & Movement 18.11.2011 | Environment 21.12.2011 | Minerals 21.11.2011 | Infrastructure 28.11.2011 | Thorncroft Centre 22.11.2011 | National Media Museum 23.11.2011 | Shipley 23.11.2011 | RDSC 25.11.2011 | NMM 26.11.2011 | Ilkley 29.11.2011 | Keighley 2.12.2011 | Bingley 17.02.2012 | Queensbury 18.02.2012 | | |
| Live in District? | Yes | 11 | 14 | 5 | 8 | 3 | 6 | 0 | 6 | 9 | 7 | 2 | 14 | 4 | 13 | 16 | 14 | 132 |
| | No | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 3 |
| | Interest | 2 | 4 | 1 | 0 | 1 | 3 | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 1 | 14 |
| Gender | Male | 11 | 13 | 6 | 5 | 3 | 7 | 0 | 5 | 3 | 6 | 2 | 11 | 1 | 9 | 8 | 8 | 98 |
| | Female | 2 | 8 | 1 | 3 | 0 | 2 | 0 | 1 | 6 | 3 | 0 | 3 | 3 | 4 | 9 | 6 | 51 |
| | Transgender | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Age | 16 or under | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 |
| | 16 - 25 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 3 |
| | 26 - 35 | 3 | 5 | 2 | 0 | 0 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 3 | 16 |
| | 36 - 45 | 2 | 2 | 1 | 3 | 0 | 2 | 0 | 0 | 0 | 1 | 0 | 1 | 0 | 1 | 0 | 3 | 16 |
| | 46 - 55 | 4 | 5 | 1 | 1 | 2 | 3 | 0 | 1 | 4 | 1 | 0 | 2 | 2 | 3 | 4 | 4 | 37 |
| | 56 - 65 | 3 | 2 | 1 | 3 | 1 | 2 | 0 | 1 | 3 | 6 | 2 | 4 | 1 | 5 | 6 | 1 | 41 |
| | 65 + | 1 | 6 | 1 | 1 | 0 | 1 | 0 | 2 | 2 | 1 | 0 | 7 | 1 | 3 | 7 | 2 | 35 |
| Disability | No | 10 | 20 | 6 | 7 | 3 | 8 | 0 | 4 | 9 | 8 | 1 | 12 | 4 | 13 | 14 | 14 | 133 |
| | Physical | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 1 | 0 | 0 | 2 | 0 | 0 | 2 | 0 | 7 |
| | Learning | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Mental Health | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 1 |

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|----------------------|--|----|----|---|---|---|---|---|---|---|---|---|----|---|----|----|----|------------|
| | Sight Loss | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 |
| | Blind | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Hearing Loss | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 4 |
| | Deaf | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| | Other long term | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 3 |
| Ethnic Origin | White English / Irish / NI | 9 | 19 | 6 | 6 | 2 | 9 | 0 | 5 | 7 | 8 | 1 | 14 | 4 | 13 | 16 | 15 | 134 |
| | White Irish | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | White Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 2 |
| | Mixed White / Black Caribbean | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Mixed White / Black African | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Mixed White / Black Asian | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Mixed Other | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| | Asian / Asian British Indian | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| | Asian / Asian British Pakistani | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| | Asian / Asian British Kashmiri | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Asian / Asian British Other | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| | Black / Black British Caribbean | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| | Black / Black British African | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| | Black / Black British Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| | Chinese | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Arab | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Don't Know | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Gypsy or Traveller | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Religion | No Religion | 1 | 8 | 2 | 4 | 0 | 3 | 0 | 3 | 2 | 1 | 0 | 5 | 2 | 5 | 2 | 3 | 41 |
| | Christian | 7 | 11 | 4 | 4 | 2 | 6 | 0 | 2 | 6 | 8 | 1 | 9 | 2 | 7 | 14 | 12 | 95 |
| | Buddhist | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Hindu | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| | Jewish | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Muslim | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| | Sikh | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Other | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 0 | 0 | 1 | 0 | 0 | 4 |
| Sexuality | Heterosexual / Straight | 11 | 18 | 6 | 7 | 2 | 9 | 0 | 6 | 9 | 8 | 2 | 14 | 3 | 12 | 15 | 12 | 134 |
| | Bisexual | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |

| | | | | | | | | | | | | | | | | | | | |
|--|-------------------------|-----------|-----------|----------|----------|----------|----------|----------|----------|-----------|----------|----------|-----------|----------|-----------|-----------|-----------|------------|----------|
| | Gay | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Lesbian | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 1 |
| | Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 3 | 4 | |
| Decline | No Participation | 0 | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 7 | |
| TOTAL NO. OF EQUALITY FORMS COMPLETED | | 13 | 21 | 6 | 8 | 6 | 9 | 0 | 6 | 11 | 9 | 2 | 14 | 4 | 13 | 17 | 18 | 157 | |