

Local Plan for the Bradford District

**Core Strategy
Development Plan Document**

**Statement of Pre-Submission Consultation
- Publication Draft (2014)**

(Regulation 22)

December 2014

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1.0 INTRODUCTION

- 1.1 This report details the nature of consultation which took place between Monday 17th February and 31st March 2014 on the Core Strategy Development Plan Document (DPD): Publication Draft and the written representations which were received.
- 1.2 The report also outlines how the Council has complied with the Town and Country Planning (Local Planning) (England) Regulations 2012 in pursuant to Regulation 22:
- Regulation 17 – Application and interpretation (Statement of Representation Procedure)
 - Regulation 18 – Preparation of a local plan;
 - Regulation 19 – Publication of a local plan;
 - Regulation 20 – Representations relating to a local plan; and
 - Regulation 35 – Availability of documents: general.
- 1.3 The Publication Draft stage of the Core Strategy DPD forms the fourth and final stage prior to its Submission to the Secretary of State for Examination by an independent Inspector.
- 1.4 Section 2 sets out the methods of consultation, including which bodies and persons were invited to make representations and how these were invited. Section 3 provides a summary of the main issues raised and the Council's response. Section 4 explains the 'Next Steps' of how the preparation of the Core Strategy will progress to submission.

2.0 PUBLICATION DRAFT CONSULTATION

- 2.1 The Publication Draft presented the proposed submission Core Strategy for written representations. The Council invited written representations from specific and general consultation bodies in addition to residents and other persons carrying out business within the District. Representations were invited on the legal compliance and soundness of the Plan in addition to its compliance with the Duty to Co-operate.
- 2.2 The Publication Draft document was presented to the Council's Executive Committee on Tuesday 19th November 2013. It was then referred to Full Council for approval for publication and submission to the Government on Tuesday 10th December 2013.
- 2.3 In accordance with the requirements of Regulation 17 (*Statement of the representation procedure*) and 20, Bradford Council undertook a six week consultation on the Publication Draft and key supporting documents from Monday 17th February to Monday 31st March 2014.
- 2.4 The written representations which were received under Regulation 20 have been taken into consideration prior to submission to the Government for Examination.

Consultation documents and key supporting documents

- 2.5 The Core Strategy Publication Draft (2014) was the key consultation document which was published and made available for inspection.
- 2.6 The following list of key supporting documents were also made available for inspection alongside the consultation document:
- Engagement Plan (February 2014)
 - Equality Impact Assessment (February 2014)
 - Habitats Regulations Assessment (Appropriate Assessment) (May 2013)
 - Habitats Regulations Assessment (Appropriate Assessment) (February 2014)
 - Health Impact Assessment (October 2013)
 - Health Impact Assessment – Planning Response (February 2014)

- Statement of Consultation: Further Engagement Draft (February 2014)
- Sustainability Appraisal (February 2014)

2.7 In accordance with Regulation 17 and 19, the Council published a '**Statement of the Representation Procedure**' and a statement detailing the fact that proposed submission documents were available for inspection, including the places and times they were available for viewing. This document was also sent to specific and general consultation bodies. A copy of this document can be found in Appendix 1.

2.8 Copies of the key supporting documents (as listed in paragraph 2.6) were placed for inspection at the following ten **deposit locations** listed below. Notifications of these locations were given in the consultation letter, representation form guidance note, Statement of the Representation Procedure and on the Local Plan website.

- At the Council's principal Planning Office in Bradford (Jacobs Well)
- At Council One Stop Shops at Shipley and Keighley & Ilkley Town Hall.
- In the main local libraries in the Bradford District: (City Library & Central Library), Shipley, Bingley, Keighley and Ilkley.

Evidence Base & Other Supporting Documents

2.9 In addition to the consultation document and key supporting documents, the following key technical studies and reports were also made published on the Council's Local Plan webpage:

- Affordable Housing Economic Viability Assessment October 2010
- Bradford District Housing Requirements Study February 2013
- Bradford District Retail & Leisure Study May 2013
- Bradford District Transport Study October 2010
- Employment Land Review and Update 2008 & 2001
- Bradford Growth Assessment November
2013
- Local Infrastructure Plan October 2013
- Strategic Flood Risk Assessment February 2014
- Strategic Housing Land Availability Assessment May 2013

- Strategic Housing Market Assessment Update October 2013)
- Local Plan Viability Assessment September 2013

Publication Draft Summary Leaflet

- 2.10 A concise and informative summary leaflet was produced to provide an overview of the information presented in the Publication Draft document.
- 2.11 The summary leaflet was made available on the Council's Development Plan web pages for viewing and downloading.

Which bodies did the Council consult?

- 2.12 The Council's main consultation list comprises of approximately 2,150 stakeholders, members, groups and individuals were invited to make representations to the Publication Draft. A full list of all those consulted can be found in Appendix 2. The table below indicates those persons or bodies that were consulted. These are organised in line with the format set out within Appendix 4 of the SCI (2008).

SCI Consultees List	Total Number of Consultees	No. Informed by Letter	No. Informed by E-mail
SCI 1 - Statutory	80	11	69
SCI 2 - General	463	328	135
SCI 3 - Other	89	50	39
SCI 3 - Other Minerals & Waste	47	45	2
SCI 4 - Councillors & MPs	94	0	94
SCI 4 - Notification Request – Email	795	0	795
SCI 4 - Notification Request – Post	577	504	73
TOTAL	2,145	938	1,207

- 2.13 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 Local Plan for Bradford in order to explain the Publication

Draft documents prior to an Executive Meeting. Details of these meetings are outlined in the table below.

Date	Time	Party / Group	Venue
4 th Nov 2013	18.00 – 19.30	Labour Members Briefing	City Hall
6 th Nov 2013	13.30 – 14.30	Wharfedale Independents	
6 th Nov 2013	15.00 – 16.00	Liberal Democrats	City Hall
11 th Nov 2013	16.30 – 19.30	Conservative Group	City Hall
12 th Nov 2013	13.30 – 14.30	Cllr Martin Love	Jacobs Well
28 th Nov 2013	10.00 – 11.00	Core Strategy Member Changes Composting review	City Hall

- 2.14 An additional meeting was held on 28th November 2013 for members to highlight the changes that they felt necessary before formal publication. Proposed changes were considered by the Planning Manager prior to publication.

How these bodies were invited to make representations?

- 2.15 The Publication Draft Engagement Plan (2014) outlined how the general public, key stakeholders, local organisations and groups would be notified of the issuing of the Publication Draft document for formal representations under Regulation 20..
- 2.16 On the 11th November 2013 a **briefing event** was held for key stakeholders with the aim to provide an overview of the Publication Draft document and supporting background documents prior to approval from the Executive and Full Council. A total of 48 people attended this event.
- 2.17 A total of 2,145 **written notifications** were issued on Wednesday 12th February 2014, by letter and/or E-mail, 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 representations by the set deadline. A sample of the letter can be found in Appendix 3.

- 2.18 Statutory consultees and general consultees, totalling 543, were sent a consultation letter along with a copy of the Statement of the Representation Procedure, in accordance with Regulation 17 and 19.
- 2.19 **Local press** provided local media coverage on the Core Strategy Publication Draft consultation. The main news articles published can be found in Appendix 4. The following newspapers specifically published notice of the consultation period to residents across the District:
- Telegraph and Argus on Friday 14th February 2014
 - Keighley News on Thursday 20th February 2014
 - Ilkley Gazette on Thursday 20th February 2014
- 2.20 Notice of the consultation was posted on Bradford Council's **social media sites – Facebook and Twitter** on Monday 17th February. A screen shot of these notifications can also be found in Appendix 4.
- 2.21 The **Council's Local Plan website** (www.bradford.gov.uk/planningpolicy), 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. Details of how people could comment on the consultation documents, along with a representation form, guidance note and an FAQ sheet were clearly provided to help people engage in the representation process. The webpage image can be found in Appendix 5.
- 2.22 Post consultation results indicated that the Core Strategy: Publication Draft consultation web page received 5,914 page views by 1,798 users between Monday 17th February and Monday 31st March 2014.
- 2.23 **Issue 19 of the e-Newsletter - Plan-It Bradford** included details of the consultation. The newsletter was distributed via email to 1,119 subscribers in March 2014. This newsletter along with past editions is available to view on the Council's website. Extracts of this newsletter can be found in Appendix 6.

Written Representations

- 2.24 The Council received a total of 572 written representations.
- 522 of these were duly made and submitted within the set deadline;
 - 1 duly made representation where attachment file could not be opened.
 - 1 part of 1 duly made representation was withdrawn.
 - 1 respondent made two identical representations, only one of these has been counted.
 - 49 of these were not duly made as they received after the formal set deadline.
- 2.25 Many of the representations received demonstrated a good awareness of the issues and challenges facing the Bradford District. Appendix 7 contains a summary of the issues raised by topic area and how these have been addressed by the Council.
- 2.26 The Council recorded the initial method of submission; this indicated that submissions were primarily by E-mail and then post.
- 310 submissions by E-mail
 - 212 submissions by post.
- 2.27 The duly made representations included a range of statutory bodies, neighbouring local authorities, Town and Parish Councils, amenity and interest groups, developers, infrastructure providers, various under-represented groups and members of the general public. The table overleaf provides an indication of the breakdown of consultation responses by category.

Category of Respondent	No. of Responses Received
Statutory Bodies	10
Town & Parish Councils	9
Bradford MDC Councillors / MPs	16
Community Groups	16
Organisations	27
Agents	32
Individuals	412

Equality and Diversity Monitoring

- 2.28 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 included as part of the representation form to be filled in.
- 2.29 A total of 226 out of 522 Equality and Diversity Forms were completed and returned during this consultation. Of this 76 persons chose not to participate in the exercise.

QUESTION	OPTIONS	TOTALS
Live in District?	Yes	137
	No	11
	Interest	27
Gender	Male	101
	Female	66
	Transgender	0
Age	16 or under	7
	16 - 25	6
	26 - 35	7
	36 - 45	21
	46 - 55	40
	56 - 65	36
	65 +	52
Disability	No	152
	Physical	0
	Learning	0
	Mental Health	1
	Sight Loss	2

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	Blind	0
	Hearing Loss	4
	Deaf	0
	Other long term	3
Ethnic Origin	White English / Irish / NI	159
	White Irish	1
	White Eastern European	1
	White European	1
	Mixed White / Black Caribbean	0
	Mixed White / Black African	0
	Mixed White / Black Asian	0
	Mixed Other	1
	Asian / Asian British Indian	0
	Asian / Asian British Pakistani	0
	Asian / Asian British Kashmiri	0
	Asian / Asian British Other	0
	Black / Black British Caribbean	0
	Black / Black British African	0
	Black / Black British Other	0
	Chinese	0
	Arab	0
	Other	0
	Don't Know	0
	Gypsy or Traveller	0
Religion	No Religion	62
	Christian	96
	Buddhist	2
	Hindu	1
	Jewish	1
	Muslim	1
	Sikh	1
	Other	5
	Sexuality	Heterosexual / Straight
Bisexual		0
Gay		2
Lesbian		0
Other		0
Decline	No Participation	76
TOTAL NO. OF EQUALITY FORMS COMPLETED		226

3.0 SUMMARY OF CONSULTATION RESPONSES

- 3.1 The following sets out the main issues raised in the written representations to the Core Strategy Publication Draft. A full summary of these issues and the Council's response can be found in Appendix 7.

Summary of Main Issues

The following sets out the main issues raised in representations. For full summary of issues see Appendix 7.

Spatial Vision

1. General support of vision.
2. Plan period should be longer linked to likely adoption of site Allocations DPD.
3. Vision is not sound as there is no evidence of how infrastructure will be delivered.
4. The vision is not deliverable.

Plan Objectives

1. General support of objectives.
2. Concern approach in rest of plan does not meet or conflicts with Objectives.
3. Objective to prioritise brownfield land does not comply with NPPF.
4. Objective on biodiversity should seek to enhance as well as manage and safeguard.
5. Objectives should promote more energy efficient homes

Presumption in Favour of Sustainable Development

P1 - Presumption in Favour of Sustainable Development

1. Support for policy.
2. Clarity needed on how it is applied.
3. Policy is not in compliance with NPPF.

Strategic Core Policies

SC1 - Overall Approach and Key Spatial Priorities

1. Support for focus of development being to Bradford.
2. Support for role of other settlements.
3. Clarification is need on economic growth areas.
4. Concern on capacity of infrastructure to support growth and adequacy of evidence on infrastructure.
5. Policy should promote use of buildings before greenfield and greenbelt in particular listed buildings.
6. Concern in focus of development in Bradford and its impact and deliverability
7. Green belt should be strengthened.
8. Concern over the identification of Ilkley as Principal Town and need for clarity as to role of Principal Towns.

9. Policy restricts development in Local Service Centres is in conflict with NPPF.

SC2 - Climate Change and Resource Use

1. Support for policy.
2. Suggestion that more organisations are referenced under the policy including Yorkshire Water and Environment Agency.

SC3 - Working together to make Great Places

1. Support for policy.
2. Suggested need for further work on cross boundary issues such as flood risk, housing delivery and transport.
3. No evidence provided on how duty to cooperate has been complied with in preparation of Core Strategy in particular cross boundary issues with Leeds.
4. Note failures of past planning decisions to address cross boundary impacts.
5. Policy is too technical and not easily understandable or clear.

SC4 - Hierarchy of Settlements

1. Support for use of hierarchy.
2. Support for focus of development in regional City of Bradford.
3. Support for identification of Ilkley and Bingley as Principal Towns.
4. Identification of Ilkley as a Principal town is not justified by evidence and is based upon the flawed approach of the now revoked RSS.
5. Support for identification of Local Growth centres as sustainable places for further development including Queensbury, Thornton and Steeton-with-Eastburn and Silsden.
6. Objection to the downgrading of Burley-in-Wharfedale from Local Growth Centre to Local Service Centre.
7. Support for the identification of Local Service areas including Haworth and Addingham and Menston.
8. The policy is overly restrictive in term of scale and timing of development in Local Service Centres.
9. Criterion C should apply to all tiers of the hierarchy not just Principal Towns.

SC5 - Location of Development

1. Support for policy in particular the prioritisation of brownfield land.
2. The policy seeks to prioritise the use of brownfield land which does not comply with NPPF.
3. More should be done in the policy to support use of brownfield land and also make use of windfalls.
4. Concern that development industry will not deliver brownfield sites.
5. Need for stronger implementation strategy on brownfield land in support of the policy.
6. Support for the need for green belt change.
7. Unclear on how policy works in terms of how greenfield, including former safeguarded land and green belt will be considered under the policy.
8. Urban extension should not be left to the end of the plan period and may be required in early part of plan.

9. Clarity is needed in policy on approach to urban extensions.
10. No need for urban extensions in particular one at Holme Wood.
11. Support for transport and accessibility approach of Policy.
12. Accessibility standards are inflexible and do not allow for mitigation.
13. Unclear on relationship between part A and B of policy and relationship with assessment of sites.

SC6 - Green Infrastructure

1. Policy is supported.
2. Concern about the application of the policy in particular by the approach to development as set out other policies which would result in loss of green space.
3. Policy fails to include the Leeds & Liverpool Canal which is a key element of strategic green infrastructure in the District.

SC7 - Green Belt

1. Support for policy and the need for change to green belt boundary including Wharfedale.
2. No exceptional circumstances have been demonstrated in line with NPPF to support a review of the green belt.
3. Green belt should not be lost for development.
4. Green belt change should be limited to meeting needs of affordable housing or first time buyers.
5. The proportion of green belt change is not appropriate or considered sound in particular the scale of change in Ilkley.
6. There should be full green belt review rather than a selective review.
7. Policy should include purposes of green belt in NPPF.
8. Need for clarity on methodology for any green belt review and ensure that adjoining LPAs are involved.
9. Green belt review itself should not be left until Allocations DPD and should be addressed in Core Strategy.
10. The green belt when reviewed should last well beyond the plan period with the allocation of safeguarded land which would provide a supply of land for a further 5 - 15 years from end of plan period in line with NPPF.
11. Green belt change should not just meet needs for long term development.
12. Concern policy will allow damaging development which would lead to encroachment and coalescence in particular between Bradford and Leeds in key strategic green belt.
13. Policy needs to provide stronger protection from possible coalescence of settlements.

SC8 Protecting the South Pennine Moors and their Zone of Influence

1. Support for need for policy and general approach
2. Support for the principle of zones to protect the South Pennine Moors SPA/SAC
3. The Policy is based upon the HRA evidence base which has legal and scientific flaws
4. Policy is too precautionary and restrictive and not in accordance with the NPPF.
5. Concerns in relation to the approach to management and mitigation measures and delivery of these and need for further work.

SC9 - Making Great Places

1. Support for policy.
2. The policy should include measurable elements of 'great places' and an appropriate range of quantifiable targets and indicators.
3. Suggested inclusion of additional outcomes under policy including re-use of buildings, air pollution, and density of development etc.
4. Policy should promote, where possible, the protection and enhancement of the natural environment within developments.

Sub Area Policies

BD1 - City of Bradford including Shipley and Lower Baildon

1. The Holme Wood Urban Extension is not consistent with the NPPF, particularly paragraphs 79 and 80 as it contravenes the five purposes of the Green Belt.
2. The importance and purpose of the Green Belt and Holme Wood has not been fully considered.
3. There is insufficient existing and planned infrastructure to meet the proposed apportionment, particularly at Holme Wood and the needs of the new community.
4. Infrastructure stresses, particularly congestion have not been fully assessed with regard to other areas
5. The special heritage and landscape value of Tong and Tong Valley has not been fully considered.
6. There should be more emphasis on Brownfield land on which development should be prioritised
7. The proposed apportionment for the Sub Area is disproportionately high.
8. Concern regarding the potential impact on the World Heritage site and other Heritage assets across the city.

BD2 - Investment priorities for the City of Bradford including Shipley and Lower Baildon

1. Support for policy.

AD1 – Airedale

1. There is insufficient existing and planned infrastructure to meet the proposed apportionment across the Sub Area
2. There should be more development on brownfield land and less on Greenfield land the Green Belt.
3. The heritage and landscape value assets will be affected by the apportionment

AD2 - Investment Priorities for Airedale

1. Support for policy.

WD1 - Wharfedale

1. The housing apportionment for Wharfedale is too high

2. There is insufficient existing and planned infrastructure to cope the proposed apportionment in Wharfedale, particularly education, medical facilities, parking and railway parking
3. Greater congestion on commuter routes to Bradford & Leeds especially due to lack of employment in and planned for Ilkley and Wharfedale
4. There is not enough employment in Wharfedale to support the proposed housing apportionment
5. There should be more emphasis on brownfield development
6. The exceptional circumstances for development on the Green Belt have not been met
7. The unique landscape and habitat value of the Green Belt in Wharfedale and Ilkley's heritage should prohibit releases

WD2 - Investment Priorities for Wharfedale

1. Not enough clarity on or commitment to infrastructure requirements and provision.

PN1 - South Pennine Towns and Villages

1. There is insufficient existing and planned infrastructure to cope the proposed apportionment in the Sub Area.
2. The proposed housing apportionment is too high.
3. There should be no Green Belt release and more emphasis on brownfield development.
4. The proposed apportionment will harm the landscape and heritage assets of the sub area.

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

1. Broad support for this policy.

THEMATIC POLICIES

Planning for Prosperity

Economy

EC1 - Creating a successful and competitive Bradford District economy within the Leeds City Region

1. Quarry sites should be specifically referenced within the policy.
2. The plan conflicts with NPPF as it does not support agricultural diversification, rural business or tourism and leisure developments.
3. Policy is supported.

EC2 - Supporting Business and Job Creation

1. Policy is supported.
2. The target of creating 2897 jobs per annum is not achievable and is at odds with the proposed housing target.
3. The proposals do not indicate how the District will grow its job numbers.

4. There is insufficient information on proposed employment sites for Ilkley.
5. The refusal of planning permission for alternative uses on land allocated for employment purposes is contrary to paragraph 21 of NPPF.

EC3 - Employment Land Requirement

1. Additional commercial development in the District is not sustainable as the transport system is already congested.
2. The plan conflicts with NPPF paragraph 37 as it does not balance employment land provision with housing.
3. The proposed scale of development in Wharfedale is too high.
4. Object to the reduction in employment land in Wharfedale from 10 hectares in FED to current figure of 5 hectares.
5. Additional source of employment land should include: 'Previously developed Land and Buildings.
6. The development of land for major employment purposes within the M606 corridor could have an adverse impact on the operation of the M606 motorway.
7. The policy is supported.

EC4 - Sustainable Economic Growth

1. New priority business sectors should be located in areas which have good transport accessibility.
2. New businesses should not be located in the Worth Valley area of Keighley.
3. The required building standard, 'BREEAM Very Good' is too low leading to an increased carbon footprint.

EC5 - City, Town, District and Local Centres

1. Support for policy with reference to Bradford city centre as focus for delivery.
2. Support for policy for enhancing the role and function of all identified centres.
3. Suggested inclusion of Bolton Woods Quarry site as an area for a mix of land uses.
4. The test of 'scale' in the policy is considered not fully compliant with NPPF.

Transport

TR1 - Travel Reduction and Modal Shift

1. Road network needs to be improved to handle extra traffic.
2. Plans will lead to increased traffic and congestion.
3. Plans will lead to increased use public transport.
4. TR1 is unachievable.
5. People living in rural areas are more likely to drive due to accessibility to public transport.
6. Trains are full to capacity at peak times.
7. Roads congestion.

8. Proper provision for additional capacity on the roads should.
9. Relocate businesses to reduce road freight.
10. Issues with closed and unmaintained footpaths.
11. rail services in Wharfedale are running at capacity.
12. New developments will have major impacts on existing transport networks.
13. The Plan should propose a number of funded transport infrastructure improvements linked to the new housing developments.
14. Leeds and Bradford Councils need to work together on transport solutions on A65/A660.
15. Absence of bus links (Wharfedale to Bradford) and parking issues at rail stations in Wharfe Valley lead to people commuting by car.
16. Plan should support Wharfedale Greenway cycle and pedestrian route.
17. Difficult to reduce Bus times when opportunities are limited for providing bus priority.

TR2 - Parking Policy

1. Problems of on-street parking around rail stations.
2. Car parking provision at Menston is grossly inadequate and incapable of expansion.
3. Parking issues in Burley especially near rail station and village centre.
4. Unfortunately reducing long stay parking in town centres in Wharfedale could have unintended effect of reducing the use of the railway by commuters.
5. Many people will be tempted to drive after the withdrawal of free bus services from High Rods development to station.
6. Park and Ride is desirable but unlikely to be financially viable.
- 7 Policy TR2 provides support for the provision of bus and rail park and ride facilities but the infrastructure schedule doesn't contain any detail of park and ride.
- 8 Adverse impacts on the safe and efficient operation of M606.
- 9 Additional land required for Ilkley Park and Ride.
- 10 TR2D seems to limit Park and Ride provision to where there is an existing capacity problem.
- 11 Introducing parking charges at stations will worsen on-street parking in surrounding areas.
- 12 Shortage of parking in Ilkley and Addingham.
- 13 Not enough parking spaces to encourage modal shift to public transport.
- 14 No provision for park and ride in Wharfedale.
- 15 Park and Ride near to Addingham bypass is required.
- 16 Ben Rhydding station needs a Park and Ride.

TR3 - Public Transport, Cycling and Walking

1. The accessibility standards are not flexible, justified and reliance on them could result in an ineffective plan.
2. The Core Strategy could identify specifically the potential for both rail and road connections to Leeds Bradford Airport
3. More clarity is required regarding the funding of Transport Improvements such as those contained in Rail Plan 7

TR4 - Transport and Tourism

1. Ilkley should not be adversely affected by impact of transport but should continue to encourage visitors.
2. Support improvements to access by sustainable modes of transport to tourist destinations.
3. Support the maintenance and development of the waterways and towpaths.
4. Congestion on A65 – measures will be needed to encourage tourism in visitor numbers.

TR5 - Improving Connectivity and Accessibility

1. Support for the improved connectivity to Leeds Bradford Airport.
2. Poor transport systems discourages real growth in new employment in lower Wharfedale.
3. A65 through centre of Ilkley is running at or over capacity.
4. Transport Study highlights the A65 was incapable of significant expansion.
5. Addingham village streets are congested and parking and other facilities are under too much pressure.
6. The protection of the South Pennine Moors is correct but congestion on the A65 leads to traffic rat running along the parallel route alongside the Special Protection Area boundary which will impact on protected habitats
7. A by pass is needed for Ilkley.
8. Wharfedale has poor public transport services.
9. The public transport system is over stretched.
10. Rail links are running at capacity with overcrowding.
11. Recognition should be given to Keighley Worth Valley Railway being used as public transport system to Haworth.

TR6 - Freight

1. Concern regarding affect of Employment development s on highway capacity and safety.
2. LBIA considers that there is potential for businesses to be attracted to the airport to benefit from international connectivity.

TR7 - Transport Investment and Management Priorities

1. Transport Projects and priorities should be added to Policy TR7 and not left solely to being listed in the infrastructure plan.

TR8 - Aircraft Safety

No issues raised.

Planning for People

Housing

HO1 - Scale of Housing Required

General Issues

1. Support for the proposed level of housing from adjoining local authorities
2. Query as to whether the Council has met its duty to co-operate;

3. Suggestion that the target should relate to an extended plan period geared to expected adoption date of the Allocations DPD;
4. Both support and objections for the inclusion of a backlog element which relates to unmet need since 2004;
5. Objections to the inclusion of an allowance for the reduction in vacant dwellings;
6. Objection to the lack of an allowance for clearance and demolition;

Arguments that the housing requirement has been set too low on the following grounds:

7. The requirement is less than the previous RSS figure;
8. Need to provide for more affordable housing;
9. Criticism of the use of the interim 2011 based household projections and arguments that these embed recessionary conditions;
10. Arguments that the 2008 based household projections should be used;
11. Criticism of the jobs growth assumptions used in the Housing Requirement Study (HRS) and the fact that these are lower than the aspirational jobs growth target in Policy EC2;
12. Questioning of assumptions in the HRS including vacancy rates and economic activity rates;

Arguments that the housing requirement has been set too high on the following grounds:

13. Alleged vested interests on the part of the consultants who carried out the HRS;
14. Lack of evidence;
15. Mistrust of the reliability of projections;
16. Claims that economic conditions will not support the assumed number of jobs;
17. Arguments that there is no demand for the proposed number of homes;
18. Arguments that the number of homes cannot and will not be delivered;
19. Alleged land supply constraints;
20. Impact on the countryside;
21. Suggestion that a windfall allowance should have been included to reduce the requirement;
22. Suggestion that the requirement is too high due to the number of vacant homes;
23. Concerns over green belt loss;

HO2 - Strategic Sources of Supply

1. A number of supporting representations;
2. Concerns over alleged reliance in the plan on windfalls;
3. Alleged land supply deficits based on the SHLAA;
4. Suggestion that Burley In Wharfedale should be re-instated as a housing growth area;
5. Objections to the proposed Holme Wood Urban extension for the following reasons:
 - a. Duty to co-operate;
 - b. No need or justification;
 - c. Green belt loss;
 - d. Flawed consultation;
 - e. Environmental impacts
 - f. Infrastructure concerns;
 - g. Roads and congestion;

6. Both support and objections to the proposed green belt releases. Objections query whether compliant with NPPF or whether there are exceptional circumstances to justify change; duty to co-operate raised;
7. Objections to the proposed scope of green belt review – related to Policy SC7;

HO3 - Distribution of Housing Requirement

1. Support for the proposed distribution including the number of new homes planned for the regional city and the Canal Rd Corridor within it;
2. Concerns over the general principles governing the distribution in particular;
 - a. The use of the HRA and impacts on the S Pennines SPA / SAC;
 - b. Viability concerns particularly in Bradford;
 - c. Infrastructure concerns;
 - d. Queries relating to whether land supply evidence supports the targets chosen;
 - e. Suggestions that there is only need for new homes in Bradford;
 - f. Queries whether the proposed homes in certain settlements will be meeting Bradford's needs or whether they will be serving the needs of adjoining authorities, particularly Leeds;
3. Concerns that the Bradford SE target is too high due to proposed green belt loss, infrastructure issues;
4. Concerns over the level of housing proposed in the Shipley constituency
5. Concerns over the proposed level of housing in the Thornton and Allerton ward;
6. Suggestion that the target for Keighley has been set too low;
7. Representations suggesting both the Bingley target has been set too low and set too high';
8. Representations suggesting both the Ilkley target has been set too low and set too high' focusing on
 - a. green belt,
 - b. impacts on the S Pennines SPA / SAC
 - c. infrastructure;
 - d. lack of local need in the area;
 - e. allegation that housing here will be meeting Leeds's need;
 - f. target not sufficient to meet local need as demonstrated by a range of market indicators;
 - g. suggestions that Ilkley is not a Principal Town;
 - h. suggestions that the target is too low to support Ilkley's role as a Principal Town;
 - i. flood risk and drainage;
 - j. impacts on the character of the town;
9. Representations suggesting both that the overall level of development proposed in Wharfedale is too high or too low;
10. Objections to the Silsden target on the grounds both that it is too high and too low;
11. Objections suggestion the Steeton target has been set too low;
12. Representations suggesting both that the target for Addingham is too high and too low;
13. Concerns over the Baildon target being too high in relation to heritage impacts, roads and congestion, infrastructure, lack of need, and whether the homes will actually be meeting need in Leeds;
14. Arguments that the housing target for Burley In Wharfedale should be higher based on – suggestion that Burley should be re-instated as a Local

Growth Centre in the settlement hierarchy; that the reasons for reducing the target relating to the HRA are unjustified; the extent of land available land supply within the SHLAA; market signals indicating unmet need in the area;

15. Concerns also that the Burley In Wharfedale target has been set to high with worries other green belt loss and coalescence of settlements; plus lack of employment opportunities in the area;
16. Support for the Cullingworth target;
17. Concerns over the Haworth target due to impact on landscape setting and conservation area;
18. Support for the Menston target but also objection suggesting it is too high;
19. Objections suggesting the Wilsden target is too high;

HO4 - Phasing and Release of Housing Sites

1. A number of supporting representations particularly from utility and infrastructure providers;
2. Concerns that the principle of a phasing policy is contrary top the NPPF;
3. Concerns that the policy might impede the availability fo a 5 year land supply;
4. Concerns that phasing may undermine delivery of homes;
5. Suggestion that phasing policies have been widely responsible in many local authorities including Bradford for under delivery of housing in the past;

HO5 - Density of Housing Schemes

1. Support for the policy and the principle of using land efficiently;
2. Concerns that the density target of 30dph is unjustified;
3. Suggestions that the 30dph density target is too high and also that it is too low;
4. Concern that the policy might undermine delivery;
5. Concern over alleged lack of flexibility in the policy;

HO6 - Maximising use of Previously Developed Land

1. A number of representations of support;
2. Alleged conflict with the NPPF as the NPPF used the term 'encourage' whereas the policy uses the term 'prioritise';
3. Allegation that the policy might undermine the maintenance of a 5 year land supply;
4. Support for the flexibility in the policy but suggestion that this is not mirrored in Policy SC5;
5. The policy may stifle delivery;
6. Suggestions that the PDL targets are both too high and both too low;
7. Queries whether the targets are supported by evidence / SHLAA;
8. Suggestion that the policy should be amended to prevent green filed development until brown filed sites have been used;

HO7 - Housing Site Allocation Principles

1. A number of representations of support;

2. Objections to elements relating to previously developed land prioritisation and phasing;
3. Objections to the use of green belt in principle;
4. Objections that the policy suggest green belt use should be minimised;
5. Suggestions for minor wording changes including on biodiversity;

HO8 - Housing Mix

1. Support for policy
2. Question whether the policy will deliver housing which meets the needs of older people?
3. The policy is too imprecise to deliver an appropriate mix of housing in different parts of the district?
4. The site size threshold for requiring housing mix is too low to deliver a mix of housing and should be increased
5. The plan is insufficiently precise about the types of housing that are needed in the various locations

HO9 - Housing Quality

1. The policy will place substantial additional burdens upon housing development which is not justified by the evidence.
2. Building standards are best addressed through the building regulations
3. The requirement for Building for Life¹² assessment should not be mandatory
4. The Space Standards in Part E are unsound and unjustified
5. Part B of policy H09 is contradictory as it encourages all new housing to meet the highest possible sustainable design and construction standards but requires a standard that is not the highest and is subject to feasibility and/or viability'
6. There is no reference to the need to provide renewable energy generation technology in new housing developments
7. The plan will lead to substandard housing being allowed, especially where developments are of less than 10 dwellings.

HO10 - Overcrowding and Vacant Homes

1. One general comment received;

HO11 - Affordable Housing

1. The policy will not deliver sufficient affordable housing to meet identified need
2. The levels of affordable housing are not justified by the Council's own evidence and will render the plan undeliverable.
3. The site size threshold of 5 will have viability and deliverability implications
4. The policy does not take into account local affordable housing need.
5. Support for the inclusion of allowing developers to demonstrate viability regarding the delivery of affordable housing.
6. Support that the policy includes that provision is "up to" the relevant percentage thresholds
7. The plan conflicts with NPPF paragraph 54 as it does not take account of rural areas / rural need.

HO12 - Provision of Sites for Gypsies, Travellers and Travelling Showpeople

1. Two supporting representations. No objections to the policy received.

Appendix 6 – Housing Implementation and Delivery

1. A number of objections suggesting that the trajectory is back loading development and preventing delivery to cater for previous unmet need / backlog met in the first 5 years;

Planning for Place

Environment

EN1 - Open Space, Sports and Recreational

1. Support for policy
2. Need to ensure the policy reflects the most recent Playing Pitch Strategy
3. Concern that the evidence base supporting the policy is not up to date
4. Concern over lack of commitment to improving open space provision
5. Need to link to mitigation and green infrastructure policies

EN2 - Biodiversity and Geodiveristy

1. Policy should include detailed criteria for protection of SSIs and other protected areas.
2. need for clarification on Ecological Network plans
3. Wording of policy is not compliant with habitats Directives

EN3 - Historic Environment

1. Support for policy.
2. Concern over level of detail in policy with regards to non designated heritage assets in particular Archaeological
3. Suggest policy needs to provide more detail on how Council will support re-sue of listed buildings
4. concern the policy does not adequately safeguard heritage assets and their settings

EN4 – Landscape

1. Support for policy
2. Concern about impact of plan proposals on landscape including Holme Wood and Tong Valley area

EN5 - Trees and Woodlands

1. Support for policy

EN6 – Energy

1. Support for policy
2. The Policy should promote mitigation and adaptation
3. Policy should make reference to the guidance note produced by West Yorkshire Ecology on small wind turbines.

EN7 - Flood Risk

1. Support for the policy
2. Flood risk issues in relation to ground water and surface water should also be addressed explicitly.

EN8 - Environmental Protection Policy

1. Support for policy
2. Suggest added reference to Part C to amenity
3. Criterion B does not address the issue of remediation in relation to unstable land, A minor wording amendment to criterion B is considered necessary To be effective and to be fully consistent with national policy,

Minerals

EN9 - New Minerals Extraction Sites

1. The policy does not provide adequately for the protection of heritage assets.

EN10 - Sandstone Supply

1. No issues raised in duly made representations.

EN11 - Sand, Gravel, Fireclay and Coal Supply

1. The policy will not protect the people of the District from the adverse effects of shale gas extraction by hydraulic fracturing.
2. The requirement to demonstrate the quality of coal resources is superfluous and inconsistent with the NPPF.

EN12 - Minerals Safeguarding

1. The policy does not adequately provide for the safeguarding of sandstone resources as resources would be allowed to be sterilised where prior extraction would prejudice the proposed surface development.

Waste Management

WM1 - Waste Management

1. Support for policy

2. Concern over location and access to household waste sites and need for coordination across local authority boundaries

WM2 - Waste Management

1. Support for Policy
2. Waste Management Strategy should be revised based on combined heat/power plants and transport requirements

Design

DS1 - Achieving Good Design

1. Support for policy.
2. Need for specific reference to the Ilkley Design Statement.

DS2 – Working with the Landscape

- *No issues raised.*

DS3 - Urban character

1. Support for policy.

DS4 - Streets and Movement

1. Only brownfield sites should be developed.

DS5 – Safe and Inclusive Places

- *No issues raised.*

Implementation and Delivery Policies

ID1 - Development Plan Documents and Annual Monitoring Report

1. Support for policy.
2. The use of Supplementary Planning Documents should be kept to a minimum.
3. Explanation of role of neighbourhood plans should come earlier in plan.

ID2 – Viability

1. Support for policy.
2. Any assessment of viability should be proportionate and reasonable.
3. Viability is not shown in many parts of the District and policy does not address this.

ID3 - Developer Contributions

1. The “nature” of a development should be considered as well as the scale and form of development.
2. Infrastructure contributions should not make development unviable.

ID4 - Working with Partners

1. Support for policy.

ID6 - Simplification of Planning Guidance to Encourage Sustainable Development

1. Unnecessary to introduce a policy which commits the Council to simplifying planning guidance which then goes onto list various planning tools and mechanisms.

ID7 - Community Involvement

1. Support for policy.

ID8 – Regeneration Funding and Delivery

- *No issues raised.*

Appendix 4 – Car Parking

1. Should include the sui generis uses.

4.0 Next Stage – Submission

- 4.1 The City of Bradford Metropolitan District Council considers that the Core Strategy Publication Draft, as drafted, is a sound plan and is consistent with national planning policy, and therefore should become the strategic plan for the District and direction for spatial development until 2030.
- 4.2 Responses to the Publication Draft consultation have been taken into consideration, as illustrated in Appendix 7. The Council considers that the comments put forward through written representation, whilst valid and may potentially make the content of the Plan clearer; they do not make the Plan unsound.
- 4.3 The Council therefore intends to submit the proposed Core Strategy to the Secretary of State to commence Examination in December 2014.
- 4.4 The Core Strategy will be examined by an independent Inspector. S/he will examine the Plan and look to see if it:
- Is legally compliant
 - Meets the Duty to Co-operate
 - Meets the four Tests of Soundness:
 1. Be positively prepared
 2. Be justified
 3. Be effective
 4. Be consistent with national planning policy (the NPPF)
- 4.5 The examination will take the form of a round table hearing into matters to be determined by the Inspector, taking into account representations and technical evidence. Once the Inspector has examined all aspects of the Plan s/he will issue an Inspectors Note with their decision.

5.0 Further Information

5.1 Further information about the Core Strategy is available on the Council's website at:
http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/core_strategy_introduction_dpd

5.2 For more information, please contact Development Plans at:

Post: Development Plan Team
2nd Floor (South Wing)
Jacobs Well
Nelson Street
Bradford
BD1 5RW

Telephone: (01274) 433679

Email planning.policy@bradford.gov.uk

Website www.bradford.gov.uk/planningpolicy

5.3 The Council maintains a consultation database. If you wish to be added to this database in order to be automatically notified on the progress of the Core Strategy please contact Development Plan Team using the above contact details.

APPENDIX 1

City of Bradford Metropolitan District Council Bradford District Local Plan

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

NOTICE OF PUBLICATION OF CORE STRATEGY DEVELOPMENT PLAN DOCUMENT (DPD) - PUBLICATION DRAFT AND STATEMENT OF REPRESENTATIONS PROCEDURE

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

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

Title of documents	Core Strategy DPD - Submission Draft
Subject Matter	The Publication Draft sets out the spatial vision for land use across the Bradford District until 2030, setting out strategic policies to guide the delivery of development, prioritising sustainable development in planning for population growth, economic prosperity, social equality, securing regeneration and planning for infrastructure whilst maintaining, protecting and enhancing environmental quality and respecting local character and distinctiveness.
Area covered	City of Bradford Metropolitan District
Consultation period	Written representations are invited during the 6 week consultation period commencing on Monday 17 th February and concluding at 5pm on Monday 31 st March 2014.
Address for representations	Representations must be made in writing and are strongly encouraged to be submitted on the provided Representation Form. Representations may be submitted electronically via E-mail to: ldf.consultation@bradford.gov.uk or by post to: Local Plan Group City of Bradford Metropolitan District Council 2 nd Floor South Jacobs Well Nelson Street Bradford BD1 5RW
Notification of Examination	Any representation may be accompanied by a request to be notified of these stages at a specified address when: i.) the DPD has been submitted for independent examination; ii.) the report of the Inspector (appointed by Government to carry out an independent examination into the DPD) is published; iii.) the Core Strategy DPD has been adopted.

APPENDIX 1

PUBLICATION

The Council's Core Strategy Publication Draft; Sustainability Appraisal report, Habitats Regulations Assessment, Statement of Consultation – Further Engagement Draft; and Equality Impact Assessment will be published for representations on Monday 17th February 2014. Representations are invited and encouraged on the Representation Form provided.

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

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

Representations must be received by 5pm on Monday 31st March 2014 via the methods outlined above.

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

Inspection

The Core Strategy Publication Draft and relevant support documents are available to view on the Council's website at: www.bradford.gov.uk/ldf from Monday 17th February 2014.

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

Main Council Offices

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

Main Local Libraries

- Bradford City Library, Centenary Square, Bradford, BD1 1NN
- Bradford Local Studies, Princes Way, Bradford, BD1 1SD (Access off Sharpe Street)
- Shipley Library, 2 Wellcroft, Shipley, BD18 3QH
- Bingley Library, Myrtle Walk, Bingley, BD16 1AW
- Keighley Library, North Street, Keighley, BD21 3SX
- Ilkley Library, Station Road, Ilkley, LS29 8HA

FURTHER INFORMATION

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

APPENDIX 2:

LIST OF ORGANISATIONS AND BODIES CONSULTED ON PUBLICATION DRAFT (2014) UNDER REGULATION 18(1) AND 19

SCI 1 - Statutory Consultation Bodies

- Bradford & Airedale Teaching Primary Care Trust
- British Telecom
- English Heritage
- Entec UK Ltd
- Environment Agency
- Highways Agency, Yorkshire & Humber
- Homes and Communities Agency
- National Grid
- Natural England
- Network Rail
- NHS Airedale, Wharfedale and Craven Clinical Commissioning Group
- NHS Bradford City and Bradford Districts Clinical Commissioning Group
- North Bradford Primary Care Trust
- Telewest Communications
- The Coal Authority
- West Yorkshire Police & Crime Commissioner
- West Yorkshire Police Crime Prevention
- West Yorkshire Police
- Yorkshire Water

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 (POSTAL NOTIFICATION)

- Activity and Recreation Centre
- A A Planning Services
- A Furness
- Aireborough Planning Services
- Airedale Partnership
- Aldersgate Estates Ltd
- Aldersgate Parent / Toddler Group
- Al-Farouq Associates
- All Saints Landmark Centre
- Allerton Community Association
- Anand Milan Centre
- Anchor Housing Association
- Andrew Martin Associates
- Apperley Bridge Development Residents Association
- Asian Business Forum
- Asian Trades Link
- Asquith Properties
- Atkinson Robinson Architects
- Attock Community Association
- B K Designs
- Baildon & District Residents Association
- Baildon Community Council
- Baildon Community Link
- Bangladeshi Community Association - Bradford
- Bangladeshi Community Association - Keighley
- Bankfoot Partnership
- Banks Long & Co
- Barrat Homes (Northern)
- Bedale Centre
- Bierley Community Centre
- Bingley CVS
- Bingley Labour Party
- Bioregional Quintain Developments
- BJ Design Services
- Black Mountain Millennium Green/Brunel Community Association
- Black Women's Support Project
- Blue Room Properties
- Bolton Villas HUB Project
- Bolton Woods Community Association
- Bracken Bank & District Community Association (Sue Belcher Centre)
- Bradford & District Coalition of Disabled People
- Bradford & Ilkley College
- Bradford & Northern Housing Association
- Bradford and District Association of Deaf People
- Bradford Association of Visually Impaired People & Centre for Deaf People
- Bradford Botany Group
- Bradford Breakthrough Ltd
- Bradford Cathedral
- Bradford City Farm Association Ltd
- Bradford Civic Society
- Bradford Community Environment Project
- Bradford Community Health Trust
- Bradford Community Housing Trust
- Bradford Community Housing Trust
- Bradford CVS
- Bradford East Area Federation

Core Strategy DPD: Publication Draft

Statement of Pre-Submission Consultation (2014)

- 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 Urban Wildlife Group
- Bradford Youth Africa
- Braithwaite & Guard House Community Association
- Braithwaite People's Association
- Brooke Properties
- Brunel Support Works
- Burnett Planning & Development
- Buttershaw Christian Family Centre
- Caddick Development
- Cafe West
- Calder Architectural Services Limited
- Canterbury Youth and Community Centre
- Carter Jonas
- Cathedral Centre Project
- CHAS Housing Aid
- Checkpoint / Bradford West Indian Community Centre Association
- Chris Thomas Ltd
- City Lofts Development
- Claremont Community Trust
- Clarke Foley Centre
- Clayton Village Hall Community Centre
- Clear Designs
- CNet
- Commercial Estates Group
- Community Service Volunteers
- Community Team Learning Disabilities
- Communityworks
- Contract Services
- Cottingley Community Association
- Cottingley Cornerstone
- Countryside Properties (Northern) Ltd
- Crossflats Village Society
- Cullingworth Village Hall
- Dales Design And Developments
- David Wilson Estates
- David Wilson Homes Northern
- DDA Task Team
- Delius Arts and Cultural Centre
- Denholme Community Association
- Denholme Residents Action Group
- Denholme Residents Action Group (DRAG)
- Depol Associates
- DevPlan UK
- Dial Bradford
- Dialogue Communicating Planning
- Disability Support (DS)
- DLA Architecture
- Donaldsons
- DPDS Consulting Group
- DPP
- Dr H Salman
- Drovers Way Residents Group
- DTZ Piedad Consulting
- Dunlop Haywards Planning
- E&M Batley Chartered Architects & Surveyor
- Eccleshill Youth And Community Association Ltd
- Eddisons Commercial
- Eddisons Commercial
- Edward's Rainbow Family Community Centre
- Eldwick & Gilstead Horticultural Society
- Eldwick Village Society
- Eric Breare Design Associates
- F And W Drawing Services
- F M Lister & Son
- Fagley Lane Action Committee
- Fagley Youth and Community Centre
- Farrell and Clark
- Four Square Drawing Services
- Friends of The Gateway
- Frizinghall Community Centre
- G R Morris Town Planning Consultant
- G Sutton
- George Wimpey Northern Yorkshire Ltd
- Girlington Action Partnership
- Girlington Community Association
- Goitside Regeneration Partnership
- Goldfinch Estates Ltd
- GP Planning And Building Services
- Grange Interlink Community Centre
- Greenhill Action Group
- Greenway Amenity Group
- Greenwood Youth and Community Association
- Gregory Properties
- Hainworth Wood Community Centre
- Ham Group
- Harden Village Society
- Hartley Planning Consultants
- Haworth & Oxenhope District Bridleways Group
- Haworth Community Centre
- Hayes Dobson Developers Limited

Core Strategy DPD: Publication Draft

Statement of Pre-Submission Consultation (2014)

- Hazel Beck Action Group
- Heaton St Barnabas Village Hall
- Heaton Woods Trust
- Highfield Community Centre
- HJ Banks and Co Ltd
- Hopes Centre
- How Planning
- Hurstwood Group
- Idle Baptist Church and Community Centre
- Idle Cricket Field Company Ltd
- Ilkley Design Statement Group
- Indigo Planning
- Indigo Planning Ltd
- Iyss Localities West
- J G Nolan
- J R Wharton Architect
- J S Wright
- J Slater
- Jenny Lane Action Group
- KADAL
- Karmand Community Centre
- Keighley Association Women's and Children's Centre
- Keighley College
- Keighley Disabled People's Centre
- Kelly Architectural Design
- Kirkland Community Centre
- Labrys Trust
- Laisterdyke Trinity Community Centre
- Land & Development Practice
- Landtask
- Langtree
- Leeds Bradford 20-30's Ramblers Group
- Leith Planning Ltd
- Lidget Green Community Partnership
- Light of The World Community Centre
- Little Germany Developments Ltd
- Littman Robeson
- Long Lee Village Hall
- Making Space
- Manningham & Girdlington SRB
- Manningham Community Development Centre
- Manningham Mills Community Association
- Manor Property Group
- Margaret McMillan Adventure Playground Association
- Mark Brearley & Co Chartered Surveyors
- Marshfield Community Association
- Martin Smith Designs
- Masts
- McGinnis Development
- Menston Cares
- Menston Community Association
- Michael Beaumont
- Michael Hudson
- Micklethwaite Village Society
- Millan Centre
- MNB Partnership
- Mobility Planning Group
- Mossdale Residents Community Group
- National Media Museum
- New Horizons
- Newton Street Day Centre
- North Community Centre
- North Country Homes Group Ltd
- North East Windhill Community Association
- Oakdale Residents Association
- Oakworth Village Society
- Older People's Focus Group
- Oltergraft Planning Services
- Oxenhope Social Club
- P J Draughting Services Ltd
- PACT
- Pakistan Community Neighbourhood Association
- Pan African Arts and Cultural Group
- Parkgate Design
- Parkgate Design
- Parkside Community Centre
- Peacock and Smith
- Piccadilly Estate Management Ltd
- Planet Design Group
- Planning And Design
- Planning Prospects Ltd
- Plevna Area Resident's Association
- Plot of Gold Ltd
- Polish Community Centre - Friday Group
- Princeville Community Association
- Priority Sites Ltd
- Purearth PLC
- Queensbury Community Centre
- Queensbury Community Programme
- Ravenscliffe & Greengates Community Forum
- Ravenscliffe Community Association
- Ravenscliffe Youth Centre
- Robinson Architects
- Rockwell Centre
- Rosedale Draughting Services
- Royds Advice Service
- Royds Community Association
- RPS
- Ryecroft Community Centre
- Salvation Army - Holmewood
- Sangat Community Association

Core Strategy DPD: Publication Draft

Statement of Pre-Submission Consultation (2014)

- Save Us Pub
- Scholemoor Community Association
- 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
- Simon Estates Ltd
- Sleningford Area Residents Association
- South Square Centre
- Springfield Youth And Community Centre
- St Aidan's Presbytery
- St Christopher's Youth Project
- St Francis Village Hall / St Peters PCC
- St James Securities Ltd
- St John's Luncheon Club
- St Mary's New Horizons Care in the Community
- St Oswald's West End Centre
- Star Keys Estate Agents, Valuers & Surveyors
- Stephen F Walker
- Stockbridge Neighbourhood Development Group
- Support Works
- SWG Planning Services
- The City Centre Project
- The Diamond Community Cafe
- The Emerson Group
- The Girlington Centre
- The Khidmat Centre
- The Kirkgate Centre
- The Kirkgate Centre
- The Moravian Manse
- The St Hugh's Centre
- The Vine Trust
- Thornbury Centre
- Thornbury Youth Association
- Thornton Community Partnership
- Thorpe Edge Community Forum & RCDP
- Thorpe Edge Community Project
- Throstle Nest RDA Group
- TJ Hughes
- Tong & Holme Wood Parochial Church Council
- Touchstone Project
- Transport 2000
- Transport 2000
- Tribal MJP
- Turner Associates
- University of Bradford
- Urban Splash
- Victor Road Community Project
- Vincent and Gorbing Ltd
- Visual Disability Services
- VJ Associates
- Wain Homes
- Webb Seeger Moorhouse Partnership Limited
- West Central Area District Federation Tenants & Residents
- Westfield Shoppingtown Ltd
- William Walker Partnership
- Wilsden Village Hall
- Windhill Futures Project
- Woodhall Planning & Conservation
- Woodhouse & Springbank NF
- Woodside Action Group
- Working Architects Co-Op Limited
- 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 (EMAIL NOTIFICATION)

- | | |
|---|---|
| ▪ 3rd Queensbury Guides | ▪ Bellway Homes |
| ▪ Able All | ▪ Ben Rhydding Action Group / Save Us Pub |
| ▪ Advocacy Peer Support Group for Disabled People | ▪ Bierley Community Association & Bethel Community Church |
| ▪ Aire Rivers Trust | ▪ Bingley Branch Labour Party |
| ▪ Allison And MacRae | ▪ Bolton Woods Community Centre |
| ▪ Arnold Laver | ▪ Bradford Access Action |
| ▪ Aspinall Verdi | ▪ Bradford Alliance on Community Care Limited |
| ▪ Baildon Moravian Church | ▪ Bradford District Senior Power |
| ▪ Barton Willmore | ▪ Bradford South & West Live at Home Scheme |
| ▪ Beckwith Design Associates | ▪ Braithwaite & Guard House Community |

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Statement of Pre-Submission Consultation (2014)

- Association
- Brewster Bye Architects
- Brookhouse Group
- Brother Investments (Yorkshire) Ltd
- Buttershaw Business and Enterprise College
- Carlisle Business Centre
- Carter Jonas
- CB Richard Ellis Ltd
- CBMDC - Environment Partnership
- CBMDC - Strategic Disability Partnership
- Clays of Addingham
- CNet
- Colin Appleyard
- Craven Design Partnership
- Dacre Son And Hartley
- Dacre Son And Hartley Planning Unit
- David Beighton Architects
- Denholme Community Association
- Disabled Peoples Forum
- Dracup Lodge Day Nursery
- Eddisons
- Eldwick Memorial Hall Trust
- Equity Partnership - Bradford LGB Strategic Partnership
- Fagley Tenants & Residents Association
- Faxfleet Residents Association
- Firstplan
- Forster Community College
- Fox Land & Property
- Friends of Buck Wood
- Friends of Pitty Beck
- G L Hearn Property Consultants
- George E Wright
- George Wimpey West Yorkshire Ltd
- Gilstead Village Society
- Golden Cross House
- GVA Grimley
- H.B.P Residents Association
- Hallam Land Management
- Hallam Land Management Limited
- Halliday Clark
- Hartley Planning Consultants
- Highfield Healthy Lifestyle
- Holme Christian Community
- Holme Church / Holme Christian Community
- Holme Wood & Tong Partnership Board
- Holme Wood Activity Centre
- Holme Wood Community Council
- Ilkley CVS
- Ilkley Design Statement Group
- Incommunities
- Inspired Neighbourhoods
- J C Redmile
- Jacobs
- Januarys
- Jones Lang LaSalle
- JWPC Limited
- Keighley & Worth Valley Railway Preservation Society
- KeyLand Developments Limited
- Khawaja Planning Services
- Kirkwells - Town Planning & Sustainable Development Consultants
- Lambert Smith Hampton
- Langtree Artisan
- Let Wyke Breathe
- Low Moor Local History Group
- Malcolm Bayliss
- Martin Walsh Associates
- Martineau
- Menston Community Association
- Miller Homes Limited – Yorkshire
- Miller Strategic Land
- Morston Assets Limited
- New Mason Properties
- New Testament Church of God
- Nook Cottage
- Northern Trust
- Nuttall Yarwood And Partners
- Oakenshaw Residents' Association
- P M Coote
- Patchett Homes Ltd
- Philip S Ryley & Co
- Q2 - Community Centre
- Rollinson Planning Consultancy
- Saltaire Village Society
- Saltaire Village Society
- Scholemoor Beacon
- Scott Wilson
- Sedbergh Youth & Community Centre
- Sensory Needs Services
- South Bradford Community Network
- Southmere Primary School
- Spawforth Planning Associates
- Strategic Services
- Sutton Community Association
- Taylor Wimpey UK Limited
- Taylor Wimpey UK Limited
- Taylor Woodrow Developments Plc.
- Taylor Young
- Tesco Stores Ltd
- The Arley Consulting Company Ltd
- The Bronte Society
- The Burley Bridge Association
- Thornton Moor Windfarm Action Group
- Tong Village Community Association
- Turley Associates
- Turley Associates

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Statement of Pre-Submission Consultation (2014)

- Turley Associates
- Turley Associates
- Univeristy of Bradford
- Walker Morris
- Walton & Co
- Wharfedale Friends of the Earth
- Woodlands Cricket Club - Oakenshaw

SCI 3 – General Consultation Bodies - Other Consultees

(POSTAL NOTIFICATION)

- A & S
- Aggregate Industries UK
- Alzheimers Society
- Ancient Monuments Society
- ASHLAR stone products
- Baildon Civic Society
- Bedminister International
- Bingley Civic Trust
- Birks Royd Stone Ltd
- Bradford Civic Society
- Bradley Natural Stone Products
- British Wind Energy Association
- Buildings Consultation Group
- CABE
- CEMEX UK Operations
- Charles Raistrick
- Clayax Yorkstone Ltd
- Colas Ltd
- Combined Masonry Supplies
- Council for British Archaeology
- CPRE West Yorkshire
- Darrington Quarries Ltd
- DEFRA
- Diocesan Board of Finance
- Dolmens
- Ennstone Johnstone
- Farrar Natural Stone
- First
- First
- Future Energy Yorkshire
- Hackney Carriage Proprietors Association
- Hainworth Shaw Quarries
- Hanson Aggregates
- Hard York Quarries Ltd
- Home Builders Federation
- Housing Corporation
- Islamic Relief
- Joseph Rowntree Charitable Trust
- Keighley Community Transport
- Keighley Local Enterprise Agency
- Keighley Voluntary Services
- Lafarge Aggregates & Concrete UK
- Leeds Friends of the Earth
- Leeds/Bradford International Airport
- M & G Stone Ltd
- M & M Stone
- Mercury Communications
- Midgeham Cliff End Quarry Ltd
- Mineral Resources (Yorkshire) Ltd
- Myers Group
- National Farmers Union
- Naylor Hill Quarry
- New Close Farm
- Northern Stone & Paving Co
- Npower Renewables
- P Casey (Enviro) Limited
- Parkinson Spencer Refractories Ltd
- Phillip Summers Groundworks Ltd
- Planning Inspectorate
- Prince's Foundation
- Quarry Products Association
- Railtrack Property
- Ramblers Association
- Royal Mail Property Holdings
- Russell Stone Merchants
- S M Building Products
- Safer City – Bradford & District
- Shipley Stone Sales
- Sibelco UK
- Skipton Properties LTD
- Society for the Protection of Ancient Buildings
- South Pennines association
- South Pennines Packhorse Trail Trust
- Stone Federation Great Britain
- Tarmac Northern Limited
- The Abbeyfield Society
- The Bingley Stone Company (Yorkshire) Ltd.
- The British Aggregates Association
- The British Horse Society
- The Garden History Society
- The Georgian Group
- The Green Mineral Company
- The Twentieth Century Society
- The Victorian Society
- Vista Environmental Limited

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Statement of Pre-Submission Consultation (2014)

- W E Leach (Shipley) Ltd
- West Yorkshire Ecology
- West Yorkshire Passenger Transport Executive & Authority
- Woodcrown Ltd
- Yorkshire Aggregates Ltd
- Yorkshire Gardens Trust
- Yorkshire Riding Centre
- Yorkshire Rural Community Council
- Yorkshire Union of Golf Clubs

SCI 3 – General Consultation Bodies - Other Consultees

(EMAIL NOTIFICATION)

- Addingham Civic Society
- Age Concern
- Banks Renewables
- Bradford Chamber of Commerce & Industry
- Bradford District Chamber of Trade
- Campaign for Real Ale
- Canal River Trust
- Chatsworth Settlement Trustees - Bolton Abbey
- Council For Mosques
- CPRE Bradford District
- Design Council Caba
- First Bradford
- Forestry Commission
- Friends, Families and Travellers and Traveller Law Reform Project
- House Builders Federation
- Ilkley Civic Society
- Inland Waterways Association
- Just West Yorkshire
- KeyLand Developments
- Metro
- Mobile Operators Association
- National Federation of Gypsy Liaison Groups
- National Offender Management Service
- Nature After Minerals (RSPB)
- Ramblers - Lower Wharfedale
- Ramblers Association, Bradford Group
- Royal Town Planning Institute
- RSPB
- Rural Yorkshire
- Sport England
- The Craven Trust
- The Lawn Tennis Association
- The Salvation Army
- The Theatres Trust
- The Woodlands Trust
- West Yorkshire Archaeology Advisory Service
- West Yorkshire Ecology
- West Yorkshire Fire & Rescue Service
- Yorkshire Wildlife Trust

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

- A . B . Braithwaite
- A A Bradley
- A Butters
- A L Holloway
- A Richardson
- A Waddington
- A. D. Elsegood
- Adam Garratt
- Adrian & Susan Hepton
- Aelred Monaghan
- Alan Black
- Alan Bland
- Alan Wintersgill
- Albert Edward Smith
- Andrew Kevin Ibson
- Andrew Thorby
- Anita Hampshire
- Ann Pratt
- Anne & Phil Harrison
- Anne Tupholme
- Annette Joyce
- Annette Shepard
- Anthie Padden
- Astrid Hansen
- Audrey Brand
- Audrey Hairsine

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Statement of Pre-Submission Consultation (2014)

- Audrey Hall
- B & S Wilson
- B & W Clayton
- B Crowther
- Barbara Butterworth
- Barbara Core
- Barry Bruce
- Barry Hollingshead
- Barry K Gilman
- Ben & Katie King
- Berna White
- Brian Dickinson
- Brian Dobson
- Brian Goodal
- Brian Walker
- C & M.J Harrison
- C A Bycroft
- C Dobson
- C Gale
- C V Barton
- Carol Atkinson
- Carol Hall
- Carole & Martin Woodgate
- Carole Ann Smith
- Caroline Harbron
- Catherine Bartle
- CD & KJ Lawn
- Celia Langan
- Charles Colburn
- Charles Thomspn
- Chris Davey
- Chris Morley
- Christopher & Susan Lewis
- Colin & Wendy Neville
- Cynthia Blackburn
- Cynthia Diane Jowett
- D Cartwright
- D H Robinson
- D P Gregery
- D Taylor
- Dale Cordingley
- Dan Jerwood
- David & Isabelle Heap
- David & Jane Furness
- David & Margaret Howgate
- David & Mary Clegg
- David & Shelia Davies
- David & Sue Clayton
- David Archer
- David Blackburn
- David Dale
- David Hogg
- David Jarvis
- David Machin
- David Slaney
- David Smith
- Denise & Graham Laycock
- Derrick & Dorothy Barker
- Diana Hogg
- Donald & Judith Oliver
- Donald Cowburn
- Donald Wright
- Doreen Haigh
- Dorothy Bexton
- Dorothy Buffey
- Drew Cansfield
- E A Baines
- E Armstrong
- E L Scott
- E R Puodzuinas
- E Trueman
- Elaine Bailey
- Elieen White
- Elizabeth & Andrew Milne
- Emma Holme
- Eric & Diane Smith
- Eric & Marjorie Marsh
- Eric & Sandra Robinson
- Eric Stow
- Eva Pinthus
- Fiona Powell
- Frank Leonard
- Fred Keery
- G & R Wilkinson
- G Nuttall
- G S Bromley
- G Wyness
- G Young
- Gail Baines
- Gareth Tattersall
- Gary Ware & Deborah Horrocks
- Gaynor Smith
- GE & JE Davis
- Geoffrey & Catherine Laycock
- Geoffrey N Boyes
- Geoffrey Upton
- George Turner
- GI Watson
- Gillian Rennison
- Gordon Firth
- Gordon Wrightson
- Graham Inskip
- Graham Jackson
- Graham Willson
- H Brown & D Pickles
- Harry & Moira Varo

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Statement of Pre-Submission Consultation (2014)

- Helen Rayworth
- Herbert & Joan Dobson
- Herbert Sutcliffe
- Howard Walker
- I D Galbraith
- Ian Ross
- Ian Spafford
- Ian Thackray
- J Brownson
- J C Flanagan
- J C Wilson
- J Corbybury
- J Driver
- J Garnsey
- J Hall
- J Petty
- J S Thornton
- J Smith
- J Whiteoak
- J.B.D. Wilcock
- Jacqueline River
- James Barry Somers
- James Ellison
- James Watson
- Jamir Vaddin
- Jane Dresser
- Janet & Paul Lawreniuk
- Janet Quinn
- Janet Robershaw
- Jayne Sands
- Jean & Sam Morris
- Jean Ainsworth
- Jean Clay
- Jean Hahn
- Jean Holmes
- Jean Lawn
- Jean Longley
- Jean Mathieson
- Jean Slaney
- Jean Wrightson
- Jeanette Alderman
- Jennifer Nelson
- Jessica Ralph
- Joan Wright
- Joanna Rodwell
- Joanna Tansley & Philip Calvert
- Joanne Besford & Tony Zacharczuk
- John & Carol Dixon
- John & Jacqueline Devereux
- John Barrett
- John Barry Metcalf
- John Briggs
- John Bromley
- John Wilkinson
- Josephine Vento
- Judith A. Bryan
- Judith Smith
- Julia Gill
- Julia M Thomas
- Julia Smith
- Julian & Christine Holdsworth
- Julian Barnes
- Julie Newbould
- June Barker
- K M Pumar
- Karen Higgins & Stephen Wilkinson
- Karen Taylor
- Kathleen Adams
- Kathryn & Michael Forrest
- Keith Bell
- Keith Jagger
- Kenneth & Elizabeth Hubbard
- Kym Platts
- L Ashington & M Evans
- Lara Crawford
- Laura Haworth
- Lawrence Butterfield
- Leich Holmes
- Lesley Barnes
- Lesley Latham
- Leslie Wright
- Lillian Knight
- Linda Carter
- Linda Davies
- Linda Marshall-Scurrah
- Lisa Bowden
- Louise Priestley
- Lucy Ingham
- Lynne Faulkes
- M E York
- M Forrest
- M Gordon
- M Ingleson
- M Towler
- M Turner
- Malcolm Grice
- Mandy Holmes
- Margaret Holmes
- Margaret Polley
- Margot Dalton
- Mark Jagger
- Mark Taylor
- Marlene & Donald Throup
- Martin B Fox
- Martin Spiers
- Matthew Dawson

- Matthew Thorp
- Maura Fisher Peake
- Maureen Bradley
- Maureen Green
- May Hill
- Megan Steele
- Melvyn Oates
- Michael J Monkman
- Michael Kosschuk
- Michael Ovari
- Mick & Zoe Brook
- Millicent & Jose Foster
- Miss Christine Robertson
- Miss J Birch
- Miss Rebecca Wright
- Miss S L Drinkwater
- Moira Stanhope
- Mollie Summersgill
- Mr & Mrs A Roper
- Mr & Mrs A Sands
- Mr & Mrs A. Charlesworth
- Mr & Mrs Alden
- Mr & Mrs B Tyler
- Mr & Mrs C Bannister
- Mr & Mrs C Green
- Mr & Mrs Coates
- Mr & Mrs Crabtree
- Mr & Mrs D A Robinson
- Mr & Mrs D Burke
- Mr & Mrs D N Foster
- Mr & Mrs El Abdli
- Mr & Mrs F C Rawlings
- Mr & Mrs Filligan
- Mr & Mrs G Long
- Mr & Mrs G Whitaker
- Mr & Mrs Gregory
- Mr & Mrs Hall
- Mr & Mrs Holdsworth
- Mr & Mrs Hopps
- Mr & Mrs Horsfield
- Mr & Mrs Hutchinson
- Mr & Mrs IL. Milne
- Mr & Mrs Ive
- Mr & Mrs J Green
- Mr & Mrs J Vincent
- Mr & Mrs JW Smith
- Mr & Mrs K Webster
- Mr & Mrs Lloyd
- Mr & Mrs Lumb
- Mr & Mrs Milne
- Mr & Mrs Murphy
- Mr & Mrs Penn
- Mr & Mrs R Iles
- Mr & Mrs R Ormondroyd
- Mr & Mrs R. Jenkins
- Mr & Mrs Renaldson
- Mr & Mrs S Town
- Mr & Mrs Smith
- Mr & Mrs W Birch
- Mr & Mrs Weatherill
- Mr & Mrs Whitaker
- Mr A King
- Mr A M Craven
- Mr B Slater
- Mr C Narrainen
- Mr CE & Mrs JM McCaig
- Mr D Thompson
- Mr E & Mrs IE Barker and Eugene Driver
- Mr G Rubani
- Mr J K Clapham
- Mr J P Blackburn
- Mr J Sunderland
- Mr K & Mrs D Burton
- Mr K Walker
- Mr L Clayton
- Mr M Boocok
- Mr Michael Smith
- Mr N. A. Harrison
- Mr P Bower
- Mr P Tallett
- Mr R W Rushforth
- Mr R. S. Watson
- Mr Roy Hornsby
- Mr S Carridice
- Mr S J Briggs
- Mr S Snook
- Mr T & Mrs J Matthews
- Mr T Bendrien
- Mr T Waygood
- Mr Vallance & Mrs Gillian Fraser
- Mr W Edmondson
- Mrs & Mrs Lawreniuk
- Mrs A Bennett
- Mrs A Booth
- Mrs A J Bradford
- Mrs Anne Turner
- Mrs B Irving
- Mrs B Smith
- Mrs B Wilmore
- Mrs B.M. Hudson
- Mrs C Dibb
- Mrs C Stanley
- Mrs D A Cayhill
- Mrs D Butterworth
- Mrs D Hilton-Stead
- Mrs D Stallard

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Statement of Pre-Submission Consultation (2014)

- Mrs D Wilson
- Mrs Dorothy Isaac
- Mrs E A Brown
- Mrs E Booth & Ms M Booth
- Mrs E Greenwood
- Mrs F Clapham
- Mrs F Pratt
- Mrs FM Harrison
- Mrs G M Carridice
- Mrs H.E Atkinson
- Mrs J Boundy
- Mrs J Crellin
- Mrs J Crowther
- Mrs J G Ransome
- Mrs J Galbraith
- Mrs J Hamilton
- Mrs J Naylor
- Mrs J P Scurrah
- Mrs J Place
- Mrs J Smithson
- Mrs J. Luxford
- Mrs Jacqueline Yeadon & Mr Alan Cartwright
- Mrs JM Tetley
- Mrs Joan Parrington
- Mrs K M Kirk
- Mrs K W Carson
- Mrs L Baron
- Mrs L Humphreys
- Mrs M Earp
- Mrs M Gadd
- Mrs M Grant
- Mrs M McNamara
- Mrs M Richardson
- Mrs M. Parish
- Mrs P J Pickles
- Mrs P Kellett
- Mrs P M Faulkner
- Mrs P M Quick
- Mrs P Sykes
- Mrs R Bond
- Mrs S Bunton
- Mrs S Foster
- Mrs S G Baird
- Mrs S Levey
- Mrs S Newbould
- Mrs S Poole
- Mrs S Rhodes
- Mrs S Winter
- Mrs T Charlesworth
- Mrs V Dickinson
- Ms J Reynolds
- Ms J. Wheeler
- N Moore
- N Wild
- Nicholas & Susan Simpson
- Nicola Peel
- Nicola Thompson
- Nicola Watson
- Nigel Butterfield
- Nigel Slimming
- O Sharpe
- P Casey
- P J Lanfranchi
- P M Jodd
- Pamela Brown
- Pamela Riley
- Patricia M Byrne
- Patricia & Brian Murgatroyd
- Patricia Driver
- Patricia Nicholson
- Paul Bexton
- Paula Padgett
- Pauline Benson
- Penny Thorp
- Penny Trepka
- Peter & Joyce Rossington
- Peter John Rae
- Peter Wigglesworth
- Philip Dawson
- Philippa Monaghan
- R Goodrer
- R H Baker
- R H Dinsdale
- R Marshall
- R Troth
- R Walker
- Rachel Fuller
- Ray Gledhill
- Revd John Nowell
- Richard & Jennie Buckley
- Richard Brook
- Richard Page
- Richard Pilsworth
- Richard Rodgers
- Richard Southern
- Rita Munton
- Rob Hirst
- Robert Priestley
- Robert Raisterick
- Robert Wakerley
- Robin Johnson
- Roger Slingsby
- Roger Vanham
- Rosalind V Gachson
- Rosemary Jeeps
- Ross McGibbon

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Statement of Pre-Submission Consultation (2014)

- S M Dickerson
- S Phelps
- S Pickles
- Sally Nicholson
- Salma Ahmed
- Sandra Maria Walton
- Sarah Farman
- Shan Veasey
- Sharon McGowan
- Sharon Priestley
- Shauna & Robert Banks
- Shelia & David Brook
- Shelia M Boyes
- Shelia Nurse
- Shelia Wright
- Simon P. Dugdale
- Stephen & Linda Palmer
- Stephen Johnson
- Stephen McNamara
- Stephen Town
- Steve Narey
- Stuart & Anne Dawson
- Susan Bentham
- Susan Watson
- Suzanne F. Atkinson
- Sylvia May Somers
- T. M. Hackett
- Terry Robinson
- Tessa Faulkner
- Tom Cockerham
- Tom Jones
- Tony & Ronwell Mitchell
- Tracy & Andrew Purcilue
- Trevor Bland
- Trevor Parry
- Trevor Taylor
- Tristina Brown
- V Brown
- V Fisher
- Vanessa Barry
- Vanessa Pheasey
- Vera Nicholson
- Veronica Carrington
- Victoria Cierpiol
- Victoria Smith
- Vivien Burke
- W E Evans
- W Stephenson
- Wayne Robertshaw
- William E Pratt
- William Hammill
- William Summersgill
- Y W Cunningham
- Zoe Carroll

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

- CBMDC Bradford Councillors (2014-2015) & MPs
 - A E Jones
 - A Whitehouse
 - AA Wood & E Kendal-Wood
 - Accent Homes
 - Adlington
 - Adrian & Jackie Heath
 - Adrian Hall
 - Adrian Weatherly
 - Ainscough Strategic Land
 - Aireborough Civic Society: Guiseley, Rawdon -& Yeadon
 - Alan & Barbara Haigh
 - Alan Davies
 - Alan Grange
 - Alan Mainwaring
 - Alan Taylor
 - Alan Wilcock
 - Alastair Sim
 - Alison Charnock
 - Alison Clarke
 - Alison Jack
 - Alison Plater
 - Alison Whitehouse
 - Alistair Tuxworth
 - Allan Booth
 - Alyn Nicholls and Associates
 - Andrew & Maureen Clark
 - Andrew -& Jennifer Dean
 - Andrew Carey
 - Andrew Cawthray & Aimee Coltman
 - Andrew Coates
 - Andrew Durham
 - Andrew Ellison
 - Andrew Henderson
 - Andrew Ibbotson
 - Andrew Lund
 - Andrew Robertshaw

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Statement of Pre-Submission Consultation (2014)

- Andrew Stuart
- Andrew Whitman
- Andy Eastham
- Andy Hosking
- Andy Marshall
- Andy Taylor
- Ann Gill
- Anna Watson
- Anne Briggs
- Anne Hodgson
- Anne Jarvis
- Anne Knight
- Anne Sherriff
- Annette Hattersley
- Annette Mullen
- Annie Galloway
- Anthony Barnet
- Anthony Gallagher
- Anthony Scott
- Anthony Silson
- Anthony Watson
- Antony Aspbury Associates
- Anwar Mohammed
- Archi-Structure - A Al-Samarraie
- Arrowsmith Associates
- Arts Team
- Ashley Forsyth
- Atkins
- Audrey Livett
- B D Gill
- B P Briggs
- B R Kaupe
- B3 Architects
- Baildon Friends of the Easth
- Barbara Archer
- Barbara Carney
- Barbara Cussons
- Barbara Drake
- Barbara Howerska .& Mark Guest
- Barker & Jordan Architects
- Barney Lerner
- Barry & Sue Overend
- Barton Willmore LLP
- Barton Wilmore
- Beckwith Design
- Bellway
- Belmont Design Services
- Bernard Stone
- Bev Greenall
- Bev Pease
- Beverley Roberts
- Beverly Brame
- BHS Asst Access and Bridleways Officer
- Bill Ayton
- Bluesky Planning
- Bob Sproule
- Bowman Riley Partnership
- Bradford Friends of the Earth
- Braithwaite & North Dean Action Group
- Braithwaite & North Dean Action Group
- BREEAM
- Brenda Doran
- Brett Selby
- Brett Staley
- Brewster Bye Architects
- Brian Brownutt
- Brian Clark
- Brian Hayes-Lewin
- Brian Rhodes
- Brian Sayer
- Brian Whitaker
- Bridget Rout
- British Land
- Bruce Barnes
- Bryan & Susan Collins
- Bryan Rollason
- Butterfield Signs Limited
- C & S Handley
- C/O Townend Planning Consultants
- Cala Homes Yorkshire
- Carl Rodrigues
- Carol Aitken
- Carol Bell
- Carol Chilvers
- Carol Smith
- Caroline Watson
- Caroline Wilson
- Carolyn Broadbent
- Carter Jonas
- Carter Jonas
- Cath Laycock
- Cath Rose
- Catherine Hall
- CBRE
- Ceri Lloyd
- Charles Cooper
- Charles Hall
- Charlotte Hobson
- Chas Stansfield
- Checkley Planning
- Cherry Sudall
- Chris Eyres Design
- Chris Flecknoe
- Chris Moore

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Statement of Pre-Submission Consultation (2014)

- Chris O'Neill
- Chris Terry
- Chris Truss
- Chris Willetts
- Christine Bousfield
- Christine Jones
- Christine Robbins
- Christine Went
- Christopher & Shirley Burns
- Christopher & Susan Johnson
- Christopher Holmes
- City Centre Residents Association
- CJS Designs
- Clare Ravenscroft
- Clive Nichol
- Clive Nichol
- CLR Architects
- Colin Child
- Colin Granby
- Colin Jolleys
- Colin Rowe
- Colin Shields
- Colliers
- Cora Andrews
- Coral Windows (Bradford) Ltd
- Cottingley Community Association
- Country Land and Business Association (CLA)
- Craig Barnes
- Craven Design Partnership
- Cunningham Planning
- cycle-re-cycle
- Dacres
- Dacres Commercial
- Dalebus
- Damian Miller
- Dan Smith
- Dan Stead
- Daniel Bridgeman
- Daniel Highton
- Darren Baines
- Dave Jasper
- Dave Rayner
- David & Ursula Heath
- David Austin
- David Barrett
- David Beighton Architects
- David Blackburn
- David Blackburn
- David Bland
- David Bretherick
- David Brown
- David Bruce
- David Butler
- David Caswell
- David Caswell
- David Colman
- David Gaguine
- David Griffiths
- David Hill
- David Hirst
- David Horne
- David Ibbotson
- David J Hobson
- David Jenkins
- David Kershaw
- David Lonsdale
- David Naylor
- David Newbould
- David Pilsworth
- David R Bamford & Associates
- David Richards
- David Scholefield
- David Shoemith
- David Smith
- David Starkey
- David Stead
- David Sudall
- David Wadsworth
- David Weatherhead
- Debbie Davies
- Debbie Ellison
- Debbie Holmes
- Deborah Ingleson
- Deirdre Collier
- Delphine Dorgu
- Denise Taylor
- Diane Bowyer
- Diane Royston
- Dickman Associates Ltd
- Dilys Clark
- Directions Planning Consultancy
- DJ Richards
- DLP Planning Consultants
- Dodd Franklin Stocks Partnership Ltd
- Dominic Collis
- Donald Wilkinson
- Doug Pratt
- Douglas S Brook
- DPP
- DPP
- Dr Denise Taylor
- Drivers Jonas
- Drivers Jonas Deloitte
- DTZ
- DTZ (Client - Royal Mail)
- Duncan Garfield

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Statement of Pre-Submission Consultation (2014)

- Elaine Hanson
- Elaine Pearson
- Elaine Shoosmith
- Elizabeth Austin
- Elizabeth Jane Whiteside
- Elizabeth Nutter
- Ellen Macpherson
- Ellen Zito
- Emma Hinkles
- Emma Moscrop
- Ena Mercy
- England & Lyle Ltd
- Eric Breare Design
- Eric Rawcliffe
- Esholt Sports & Leisure Ltd
- Eye 4 Design
- F S K Architectural Services
- Fairhurst
- Fairhurst
- Fairhurst
- Farid Meleki
- Faye Bland
- Fiona & Andrew Mann
- Fiona Holland
- Firebird Homes
- Forsight Bradford
- Forward Planning & Design
- Frances Griffin
- Frances Horne
- Frances McLachlan
- Frank Kirk
- Frank Taylor
- Friends of Ilkley Moor
- Fusion Online - Development Plan Monitoring
- G W P Architects
- GA Sorsby - Graphic Architecture
- Gail Sudall
- Gareth Brown
- Gareth Orchard
- Garry
- Gary Copping
- Gary Creighton
- Gary Robertson
- Gennine Worrallo
- Geoff Best
- Geoff Killock
- Geoff Tupholme
- Geoffrey & Mollie Harrison
- Geoffrey Downs
- Geoffrey Hale
- Geoffrey Home
- George F White
- George Wimpey
- George Wright
- Gerard Downes
- Gill Bateman
- Gill Cartwright
- Gill Smith & D Holmes
- Gillian Coughlan
- Gilly Hoyle
- GL Hearn
- GL Hearn
- Gladman Developments
- GLR Architects
- Glyn Brown
- Glynn Jones
- Graham Farmer
- Graham Peacock
- Graham Smith
- Grahame Brown
- Grahame Hawkings
- Grange Park Patient Participation Group
- Greenwood Youth & Community Centre
- Greg Kravtschuk
- GVA
- Gwyn Llewellyn
- Hallam Land Management
- Halton Homes
- Hannah Cummins
- Harriet Wood
- Harrom Homes
- Harvey Bosomworth
- Harvey Bosomworth
- Harvey Crowther
- Haworth Village Trust
- Haworth, Cross Roads & Stanbury Parish Council
- Hazel Goulden
- Hazlett Turner
- Healy Associates
- Heather Cook
- Heidi Sobers
- Helen Miller
- Helen Whitman
- Helen Willetts
- Helena Hunter
- Heritage Planning Design
- Hilary Thomas & Donald Porritt
- Hilary Thorniley-Walker
- Holme Wood Community Council
- Horsley Townsend
- Howard Jenson
- I Ahmed
- Iain Bath Planning
- Ian & Lisa Dowson

Core Strategy DPD: Publication Draft

Statement of Pre-Submission Consultation (2014)

- Ian Bingham
- Ian Henderson
- Ian Holdgate
- Ian Palmer
- Ian Park
- ID Planning
- IHC Planning
- Indigo Planning
- Integral Design Solutions
- Irfan Siddiqi
- J & B Hey
- J O Steel Consulting
- J S Blessington
- Jack Dixon
- Jag Picknett
- James Ellis Planning
- James Grimley
- James Reddington
- James Williams
- Jan & Lennox Towers
- Jan & Steve Pickles
- Jan Hinchcliffe
- Jane Cockcroft
- Jane Dobbie
- Jane Hitchcock
- Jane Ogston
- Jane Pearson
- Jane Pratt
- Janet Cade
- Janet Harvey
- Janet Warrior
- Janette Akeroyd
- Janette Alderman
- Janus Architecture
- Jas Architecture Services
- Jason Aldiss
- Jason Ashworth
- Jason Beckett
- Jason Taylor
- Jayne Wood
- Jean & Roy Margerison
- Jean Britteon
- Jean Hill
- Jean Holdgate
- Jean Langtry
- Jeff McQuillan Consulting
- Jeff Redmile
- Jefferson Sheard Architects
- Jeffrey Thelwell
- Jen White
- Jennifer Winyard
- Jennings Nicholson Associates
- Jeremy & Carole Windle
- Jeremy & Julia Hayhurst
- Jill Garforth
- Jill Gilholme -& Mark Kelly
- Jill Gill
- Jill Hirst
- Jill Taylor
- Jillian Clayton -& David Earley
- Jillian Dance
- Jim Adams
- Joan Henderson
- Joanna Parker
- Joanne & Mark Woodward
- Joanne Angus
- Joanne Jackson
- Joe Kemp
- Joe Scully
- Joe Varga
- John & Barbara Bramley
- John & Dianne Griffiths
- John & Jean Crerar
- John & Judith Bolland
- John & Louise Hobson
- John B Gambles
- John Bousfield
- John C Churchman
- John Clarke
- John Crosse
- John Crosse
- John D. Pratt
- John England
- John Finnigan
- John Gledhill
- John Hanson
- John Harrison
- John Horton
- John Kane
- John Muchlinski
- John Muddiman
- John Naylor
- John Pickersgill
- John Sharrock
- John Sudall
- John Symons
- John Tempest
- John Thornton Chartered Architect
- John Watmuff
- John Wright
- Jonathan Grundy
- Jonathan Farman
- Jonathan Gadd
- Jonathan Philips
- Jonathan Walton
- Jonathan White

Core Strategy DPD: Publication Draft

Statement of Pre-Submission Consultation (2014)

- Jonathan Wilkinson
- Jones Day
- Jones Homes
- Jones Lang LaSalle
- Jordon Ormondroyd
- Joyce Dykes
- Joyce Newton
- Judi Sture
- Judith Brooksbank
- Judith Caunt
- Judith Gibson
- Julian Green
- Julie Ashworth
- Julie Cooper
- Julie Rasimowicz
- June Naylor
- June Newell
- K Knappett
- KA & CE Willis
- Karen Casson
- Karen Moore
- Karen Pollard
- Karl & Angela Lavery
- Karl Payne
- Kate Bothamley
- Kate Brown
- Kate Corby
- Kate Langton
- Kate Sewell
- Kath McGee
- Katherine Cullen
- Kathryn Hardeman
- Kay Kirkham
- Keith & Tracey Revis
- Kelly Ison
- Ken & Julie Duckworth
- Ken Pearson
- Kerry Watson
- Kester Loy
- Kevin Smith
- Khawaja Planning Services
- Kirsten Huby
- Kurt Kunz
- Laura Haworth
- Lavinia Nicholls
- Lee Mulley
- Lee Smith
- Leeds City Council
- Leith Planning
- Leonard Oldfield
- Les & Shirley Burrows
- Lesley Beebe
- Lesley Bosomworth
- Levvel
- Lika Levi
- Linda Hicking
- Linden Homes
- Lisa Baker
- Liz Johnson
- Lorraine Harding
- Louisa Parry
- Louise Nash
- Louise Skelton
- Lowerfields Primary School
- Lucy Fox
- Lucy Johnson
- Lucy Pickard
- Lynda Rollason
- Lynn Airton
- Lynn Asquith
- Lynnette Cadamarteri
- M W Rickaby
- Mags & Ian Pearson
- Malcolm Balmforth
- Malcolm Bayliss
- Malcolm Bentley
- Malcolm Scott Consultants
- Mandy Stevens
- Margaret Carey Foundaion
- Margaret Core
- Margaret Houchen
- Margaret Waugh
- Marianne Curtis
- Mark & Susan Tyson
- Mark Auger
- Mark Busby
- Mark Fairbrass
- Mark Mangano
- Mark Robinson
- Mark Wogden Architect
- Martin Guest
- Martin Rowat
- Martin Sinclair
- Martin Smith
- Martin Walsh associates
- Mary Hill
- Mary Holland
- Mary Robershaw
- Mary Roche
- Matt & Kate Wilde
- Matt Stocks
- Matthew & Emma Yates
- Matthew Hayball
- Matthew Hydeleman
- Maureen Crossley
- Max Goode

- Melaine Addis
- Melissa Dennison
- Michael Baldwin
- Michael Branford
- Michael Dankowycz
- Michael Emmett
- Michael Hall Associates
- Michael Moran
- Michael Parkin
- Michael Richardson
- Michael Warrior
- Michael Woodman
- Michelle Whitaker
- Mick
- Mick Cartledge
- Mick Thompson
- Mike J Taylor
- Mike McQuaid
- Mike Ramplin
- Miles Timperley
- Minerals Planning Group
- Miranda Armitage
- MP Leeds - Pudsey
- Mr & Mrs Ashworth
- Mr & Mrs Brook
- Mr & Mrs D Aaron
- Mr & Mrs Parsons
- Mr H Cusworth
- Mr J Varley
- Mr K Duesbery
- Mrs A M Armstrong
- Mrs Helen Hodgson
- Mrs L Bennett
- Mrs S Lane
- MSS Architectural Design Services
- N. Wadie
- Nathaniel Lichfield & Partners
- Neil Baldwin
- Neil Whitaker
- Neil Wrathmell
- Newmason Properties
- Nexus Planning Ltd
- NHS
- Nichola Geale
- Nicola Woodman
- Nicolas Desiqueira
- Nigel Rabbage
- Noel & Margaret Bailey
- Norma Scott
- Norman Scarth
- Nuttal Yarwood and Partners
- Oliver & Kate Sykes
- Oliver Anderson
- Orion Homes
- P M Coote
- P N Bakes Architectural Consultancy
- Pamela Drury
- Pat Coote
- Pat Limb
- Patchett Homes
- Patricia Smith
- Patrick Smith
- Paul Hall
- Paul Kirkman
- Paul Leeming
- Paul Liddle
- Paul Murphy
- Paul Thackray
- Pauline Wood
- PDS
- Peacock and Smith
- Penny North-Lewis & Richard Coverdale
- Penny Richards
- Permission Homes
- Pete Thomas
- Peter & Dorothy Wilkinson
- Peter Barton
- Peter Bastow
- Peter Brooksbank
- Peter Carruthers
- Peter Ford
- Peter Harvey
- Peter Huby
- Peter Jenkins
- Peter Ketley
- Peter Navotni
- Peter Smith
- Peter Wilkinson
- Phil Whieldon
- Philip Ashton
- Philip Garbutt
- Philip Read
- Philip Sharp
- Phillippa Taylor
- Pierre Richterich
- Pippa Eastham
- Planning Bureau
- Planning Matters
- Planning Potential
- Planware
- Provizion First Architecture
- Prudence Bray
- R Dawson
- Rachel Kerr
- Ralph Pemberton

Core Strategy DPD: Publication Draft

Statement of Pre-Submission Consultation (2014)

- Rance Booth & Smith
- Randfield Associates
- Rapleys
- Rapleys LLP
- Ray Andrews
- Ray Bell
- Ray Graham
- Ray Marshall
- Rebecca Wheatley
- Rebecca Whitaker
- Resident - Burley-in-Wharfedale
- Resident - Thackley
- Rex, Procter & partners
- Richard Askham
- Richard Barran
- Richard Blenkiron
- Richard Eakin
- Richard Fox
- Richard Hayton
- Richard Hedges
- Rita Farmer
- Robert & Elizabeth Willey
- Robert Hodgkiss
- Robert Yorke
- Robin Naylor
- Rodney Mattock
- Roger & Joanne Wilson
- Roger & Susan Orriss
- Roger Goulden
- Roger Pickering
- Roger Raper
- Rollinson Planning Consultancy
- Rone Design
- Ronnie Bagdonavicius
- RPS Planning
- Rural Solutions
- Rural Solutions Consulting
- Ruth Hill
- S R Design
- S Redhead
- Saltaire Village Society
- Salts Tennis Club
- Sam Atkins
- Samuel MacDougall
- Sanderson Weatherall
- Sandra Brown
- Santosh Mehmi
- Sara Dawe
- Savills
- Schofield Sweeney Solicitors
- SDS Consultancy
- Sense of Space
- Sharon Callaghan
- Sharon Grundy
- Shelagh Patrick
- Shelia Carrurthers
- Shelia Robinson
- Shirley Thompson
- Shirley Thompson
- Simon & Jane Foers
- Simon Archer
- Simon Balding
- Simon Callaghan
- Simon East
- Simon Kenyon
- Simon Lewis
- Simon Myres
- Simon Paxford
- Simon Singh
- Skipton Properties
- Spawforths
- Ste Drye
- Stef Nykolajczuk
- Stephanie Calvert-Smith
- Stephen & Judith Wolstenhulme
- Stephen Blott
- Stephen Corbett
- Stephen Wood
- Steve & Donna Harrison
- Steve Gambill
- Steve Mould
- Steve Risdon
- Steve Wortner-Smith
- Steven Haley
- Strutt & Parker
- Stuart Netherwood
- Stuart Robinson
- Sue Baker
- Sue Barker
- Sue Downs
- Sue Grimley
- Sue Maddison
- Sue Priestley
- Sue Wright
- Susan & Bruce Honeyman
- Susan Griffiths
- Susan Mitchell
- Susan Moore
- Susan Piper
- Susan Simpson
- Suzanne Bretherick
- Sylvia Hesp
- Terrence O'Hara
- Terry Brown
- Terry Brown
- Terry Farrer

Core Strategy DPD: Publication Draft

Statement of Pre-Submission Consultation (2014)

- The Design Works
- The Drawing Board (UK) Ltd
- The Planning Bureau Ltd
- Think Design
- Thomas Eggar
- Thomas Sergent
- Tim Bennett
- Tim Draper
- Tim Moody
- Tom Barrett
- Tom Pollard
- Tong Fulneck Valley Association
- Tony & Denise Langley
- Tony & Eileen Payne
- Tony Caunt
- Tony Holmes
- Tony Kemp
- Tony Kilcoyne
- Tony Mitchell
- Tony Plowman
- Tracey Revis
- Tracy & David Sanderson
- Tracy Foley
- Trevor Riley
- Trevor Storr
- Trish Lambert
- Trudi Longbottom
- Turley Associates
- Val Grunwell
- Valerie James
- Vanessa Wellock
- Vera Swaine
- Vicky Kaye
- Vicky McGee
- Victoria Turland
- Vince Butler
- Vivian Cray
- Walker Morris
- Waller and Partners
- Walsingham Planning
- Walton & Co
- Watson Batty
- White Young Green
- White Young Green Planning
- WHP Wilkinson Helsby
- Willaiam Leather
- Woodhall Planning and Conservation
- Woodlands Trust
- Yorkshire Plans for You
- Yvette Guy
- Zero Architecture Ltd

Department of Regeneration & Culture

Local Plan Group
2nd Floor South, Jacobs Well
Nelson Street
Bradford
BD1 5RW

Tel: (01274) 433679

Email: ldf.consultation@bradford.gov.uk

Date: Wednesday 12th February 2014

Dear Sir / Madam,

**RE: LOCAL PLAN FOR THE BRADFORD DISTRICT - CORE STRATEGY
PUBLICATION DRAFT (REGULATION 18 & 19)**

I am writing to inform you that the Council approved the Core Strategy at Full Council on 10th December 2013 for submission to the Secretary of State for public examination by an independent Planning Inspector. In advance of submission, the Core Strategy Publication Draft will be published formally for representations, in line with the relevant Regulations on **Monday 17th February 2014** for a period of 6 weeks. Your comments are invited on the draft Core Strategy within this period.

The Core Strategy is intended to replace the strategic policies contained within the Replacement Unitary Development Plan (RUDP) for the Bradford District adopted in October 2005 and will provide the long term direction for future development and investment within the District to at least 2030. When adopted, the Core Strategy will contribute towards decisions on individual planning applications and will be used to guide the identification of site specific allocations in the more detailed Development Plan Documents to follow.

Aim of this consultation

This consultation seeks your written representation(s) on the Core Strategy Publication Draft, in particular in relation to its '**soundness**', including whether it has been prepared in accordance with the **legal requirements** and fulfils the **Duty to Co-operate**.

Availability of Documents

The Core Strategy Publication Draft and its supporting documents can be viewed and downloaded online from Monday 17th February at: www.bradford.gov.uk/ldf.

The following key consultation documents are available for inspection at the deposit locations listed below:

- Core Strategy Publication Draft
- Sustainability Appraisal
- Habitats Regulations Assessment
- Equality Impact Assessment
- Statement of Pre-Submission Consultation – Further Engagement Draft
- Statement of the Representation Procedure



Appendix 3

Deposit Locations

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

The Council will make available a limited number of hard copies which can be provided on request but you will be subject to a charge to cover the Councils costs of printing, postage and packaging.

Written Representations

Written representations should be completed using the standard Representation Form provided and submitted electronically to: ldf.consultation@bradford.gov.uk or in writing to: Local Plans Group, 2nd Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW.

The Council encourages the electronic submission of representations wherever possible.

Written representations must arrive by **5pm on Monday 31st March 2014**.

Your personal details and comments cannot be kept confidential and will be published and submitted to the Secretary of State alongside the Core Strategy for public examination by an independent Planning Inspector.

Any representation submitted may be accompanied by a request to be notified at a specified address of the submission of the Core Strategy for independent examination; of the publication of the recommendations of the person appointed to carry out the examination on the Core Strategy; and on the adoption of the Core Strategy.

Group Responses

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

Additional Guidance

The Council has produced the following additional guidance materials to assist you in making your representation which is available to view and download online from www.bradford.gov.uk/ldf.

- Guidance Note to accompany the Representation Form
- Frequently Asked Questions (FAQ) sheet

Should you have any further queries about the Core Strategy or the process for registering your comments please contact a member of the Local Plan Group on (01274) 433679.

Yours faithfully,



Andrew Marshall
Planning & Transport Strategy Manager

Telegraph & Argus – Monday 14th February 2014

Get the latest City Hall news at:
telegraphandargus.co.uk

Bands are named for festival at Oakwell

Chartoppers The Horrors and X-Factor stars Kingsland Road will perform at the first Oakwell Music Festival.

The event, in the grounds of Oakwell Hall in Bradford, will see more than 20 bands play across three stages on July 22.

More than 100 acts are set to be announced in the lead-up over the coming weeks, while local bands will include Robinsons, Averted and Lullabies.

The festival, in a main-venue event, will help local charities and community groups, and organisers, who added that it will also promote a chance to promote local musical talent.

Organiser Paul Ficker said: "Developing and promoting Oakwell Festival has taken over two solid years and we're only getting to the start with the help of such a dedicated team, with knowledge and talents in a wide range of areas."

Festival organisers want companies to get involved to help fund the festival.

He said Robert Watts Estate Agents were helping but others are urged to join.

Tickets for the festival will be £25, but there are a limited number of £10 early bird tickets for sale at oakwellfestival.co.uk.

Anyone interested in sponsoring can e-mail bradford@oakwellfestival.co.uk or ring 01274 254661.

Team gains £2,500 for expansion

A junior football club is looking towards the future after securing a boost of £2,500.

Alpha United AFC, which caters for players aged six to 17, has received the money from Bradford Council's West Area co-ordinator's office. The cash has come out of the City West Community First Fund.

Mohammed Waseem, head coach at Alpha, said: "It is fantastic that Bradford Council shares our beliefs and has decided to invest in a long-term, sustainable project which will make a better future for the local youth."

"We'll use it to create 11-a-side junior teams in under-10s, under-12s and under-14s age groups to compete on a league platform."

Councillor Brian Haxton, deputy leader of the Council, said: "We are glad to support this brilliant project which really benefits youngsters."



PLANS: Stalholder Geraldine Parker at the market in the city centre

In the market for a gift?

Still seeking a gift for Valentine's Day? Well, Cupid is calling at a special market in Bradford. The city centre is playing host to stalls offering romantic treats and gifts for those occasions.

Organised by Bradford Council, the market will run today and tomorrow in Darley Street and Bala Street with around 25 stalls selling items such as jewellery, arts and crafts, food and fresh flowers – all aimed at spoiling the nearest and dearest.

The Valentine's market is open from 10am to 4pm.



'Have your say on plans for our land'

Core Strategy to be published as City Hall indicates where homes may be built

By Rhys Thomas T&A Reporter

People can have their say about the future look of the district when Bradford Council publishes its Core Strategy which will determine land use, including where more than 42,000 new homes could be built.

The authority is in the process of preparing its Local Plan which will set out its approach to managing development and change until 2024.

According to Government figures, Bradford Council has to create a further 42,000 homes by 2024 and formal representations from the public and other interested parties will be accepted for six weeks from this Monday.

The Core Strategy of the Local Plan sets the broad policies that determine future use of land for housing, employment, retail, health and well-being, education, leisure, transport and infrastructure purposes.

Following its approval by full Council in December, this is the last opportunity for people to comment on the plan before it is sent to the Government for independent scrutiny.

Councillor Val Slater, the Council's executive member for housing, planning and transport said: "We need a thorough and robust local plan to make sure we get the right sort of development in the right areas."

"We must recognise not only the houses we will need in the future, but the type of industrial, commercial and social developments the district will experience in the next decades."

"If we get this right now, we are trying our best to do it, it will save a lot of problems in the next 24 years and help to protect our beautiful landscape."

"Of course we are subject to influences over which we have no control like the Government's housing targets and the way the economy affects housing and other investment, but we can develop a considered and practical response."

"We have to meet the needs of an increasing demand for housing as well as developing planning strategies and policies to create jobs and growth with our 2011 developers have a five-for-all on our wonderful natural landscape."

The Core Strategy Publication Draft and key support documents will be

available for public inspection at the Council offices and at civic libraries.

It does not identify individual development sites but sets out housing numbers for different areas.

Bradford city centre and the Canal Road corridor, for instance, have been earmarked for 4,000 new homes.

For more information contact the Local Plan Group on 01274 44670 or lp@bradford.gov.uk.

The Core Strategy Draft and associated documents will be available to download from Monday at bradford.gov.uk/LP.

Representations can be submitted via email to lp@bradford.gov.uk or by post to Local Plan Group, City of Bradford Metropolitan District Council, Second Floor, South James Walk, Nelson Street, Bradford, BB1 1BW.

e-mail: lp@bradford.gov.uk
@bradfordandargus.co.uk

HAVE YOUR SAY

What do you think about the idea of 42,000 homes being built in the district? Where would you build?

Continued on this story at telegraphandargus.co.uk

Friday, February 14, 2014

NEWS 11

Jamie, 20, praised by supporters



Stalholder James Michell (pictured) has been praised by Bradford Council and charity Sports Aid which supported his training. The 20-year-old, from Queensbury, missed a medal in the first of the Stalholder Sports Aid event at the weekend at the Water Demesne at Soke of Wharfedale. He has been training with the help of a £2,500 grant from a partnership between the City of Bradford and Yorkshire Services and Sports Aid. Bradford Council's Executive Member for Education and Sport Councillor Andrew Thornton said: "James has shown the edge of our world. To get into the top ten in the world in this sport is a magnificent achievement and James should be immensely proud of himself." Regional development manager for Sports Aid Rob Clark added: "James has been an amazing talent since we first supported him five years ago. To see his performance so well in such a short time shows that our Sporting Excellence programme with Bradford Council is supporting the right athletes at the right time in their development. James is a fantastic role model."

IN BRIEF

Family search

Officers of the City of Bradford are searching for the remains of David George Allen who died at home of natural causes on February 10. Mr Allen lived at Woodfield Mount in Gildersome and his family has been advised they should be happy to provide any information of Mr Allen's family members or if Mr Allen can contact Mr Allen on 01274 475335.

Rider is injured

A roadster rider was injured after his vehicle collided with a car at Wharfedale, Bradford. The collision, which involved a silver Vauxhall Astra and a silver Peugeot, resulted in the rider being taken to hospital. The rider's injuries were not serious.

Sale at the club

A fundraising sale will be held at the club on Saturday 15th February from 11am to 4pm. Admission is free and the sale will be open to all.

Coffee invitation

The next Coffee Plus event takes place this 10.30am at Bradford Library and Information Centre, Market Street, Bradford on Tuesday, February 25.

in brief

Military historian will give a talk

A leading military historian is the next speaker at Keighley and District Local History Group. Andy Wade, leader of the Men of Worth project, will speak about Keighley's Old Contemptibles on Wednesday, March 12. The talk, which begins at 7.30pm upstairs in Keighley library, will focus on local men who fought in the First World War. Tish Lawson will talk about royal visits to Bradford on April 9. E-mail speakers@keighleyhistory.org.uk for details.

Rock band to stage pub gig

Keighley rock band Black Horse Fairy will perform in Hebden Bridge on Saturday. The band, which plays songs about love, horror, menace and madness, can be seen at the Crown pub. The band is made up of long-time Keighley musicians going by the stage names of Archie Blackwell, Franklin Gothic, Count Kundalini and the Earl of Doncaster. Led by 'Edwardian suffragette' Fanny Ferris, they claim to be time-travelling adventurers.

Pianists enjoy exams success

Several students were successful in London College of Music pianoforte exams held in Keighley. They were: early learning (stage two) – Noah Smith, distinction; pre-preparatory – Madison Kernick, distinction; step one – Samuel Chapman and Olivia Preston, distinctions; step two – Danyana Driver, Khia Smith, Gurcharan Banraah and Hannah Pollard, distinctions; grade one – Hashim Imran, pass; grade two – Thalia Jefferson and Jamie Hams, distinctions; grade three – Ewe Kitching, distinction; grade six – Georgina Lomman, distinction. All are pupils of Maureen O'Hara, of Long Lee.

Antiques and collectables fair

Warley Fairs will host an antiques and collectables fair at Victoria Hall. Sunday's event is the first of five fairs planned by the company this year at the Keighley venue. Dealers will sell items including jewellery, ceramics, glass, occasional furniture, vintage and retro accessories, home wares, toys and art. The fair runs from 10am to 4pm, with access for trade from 9am. Admission is £1.50 for adults and free for under-16s.

FEARS FOR FUTURE OF GREEN BELT

DEVELOPMENT
 by KEIGHLEY NEWS REPORTER

Huge swathes of greenfield sites could be swallowed up for housing under Bradford Council's proposals for future land use, opposition councillors have warned.

To satisfy government requirements, the council has to earmark enough land in its Core Strategy document to accommodate 42,100 homes between now and 2030.

The proposals went on public display this week for a period of public consultation and suggest up to 11,000 of these homes could be built on green belt areas.

But Bingley Rural councillor Simon Cooke, Conservative deputy leader and spokesman for housing, planning and transport, said that did not seem "plausible" and would fail to meet the district's housing needs.

He said: "There is a very real risk that in ten years' time we will have lost 900 acres of open fields, while hundreds of acres of brownfield land is undeveloped."

"The proposals for housing in the urban areas around the city are often neither viable nor deliverable. Once green belt land is gone it is gone, and at that

time we may end up having to look at building on more while proposing the exact same brownfield sites that are proposed at present."

The council states that while there is a need to develop some green belt locations, the principle at the heart of the strategy is one of regeneration, to make the most efficient use of urban and previously developed land.

Coun Val Slater, the Labour-run authority's executive member for housing, planning and transport, said: "We have identified brownfield sites for development, but unfortunately there are not enough of those sites to meet the district's needs."

"Unfortunately, the 'brownfield sites first' policy was abolished nationally, so we have less power to make developers use brownfield land first."

"Regrettably, we will have to look at developing greenfield sites, but it is vital these are not the most valuable and unique lands that make up our great district."

The Core Strategy Publication Draft is available for inspection at the council offices and at main libraries, and can be downloaded at bradford.gov.uk/LDF.

keighley.editorial@keighleynews.co.uk



● Councillor Simon Cooke in Denholme, where 35 homes are to be built on a field despite protesters' objections

Housing advice in service 'relaunch'

SUPPORT

Keighley's new advice service for homelessness and other housing issues opens on Monday.

Advice has been provided through the Open Moves service, run by social landlord Incommunities, for the past few years.

This is being replaced by Housing Options, which will be run by Bradford Council from Keighley Town Hall.

Services will include housing advice, homelessness and housing allocations and other housing-related issues.

Existing Open Moves customers do not need to re-register with the service and will continue to see the same members of staff and receive the same support.

Email housing@bradford.gov.uk or call 01274 435999 for further information.

'Change tax rules' plea

POLICY

Disabled people living in specially-adapted homes should be exempt from the bedroom tax, it is claimed.

John Grogan, Labour's prospective parliamentary candidate for Keighley, said many people could not afford to lose the £14 a week from their benefits for having a spare room.

He is calling on Keighley MP and housing minister Kris Hopkins to push for a change in the rules.

"Many of these disabled people have fought hard to get their homes adapted so they can remain independent," said Mr Grogan. "What sense does it make to force them to move out when thousands of pounds of public money has been spent on adapting their homes?"

Ilkley Gazette – Thursday 20th February 2014

Call for experts to help assess Core Strategy

by Amanda Greaves

Ilkley residents are being urged to have their say on plans for 800 homes in the town, as public consultation finally gets under way on the Core Strategy of Bradford Council's Local Plan.

Campaigners are calling on residents to have their say now, fearing the influx of housing will overload the local infrastructure and swallow up the countryside.

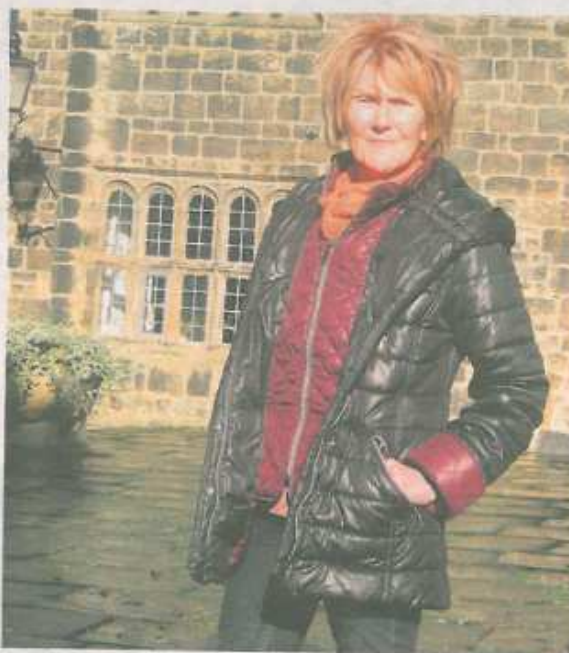
The six-week consultation period began on Monday, inviting formal representations from the public and other stakeholders.

Bradford Council is in the process of preparing its Local Plan, which will set out its approach to managing development and change until 2030.

The Core Strategy sets the broad policies that determine future use of land for housing, employment, retail, health and well-being, education, leisure, transport, and infrastructure purposes.

It proposes housing targets of 800 homes in Ilkley, 200 in Addingham, 200 in Burley-in-Wharfedale and 400 in Menston.

Following its approval by full Council in December, this is the last opportunity to comment on the plan before



Chairman of Wharfedale Planning Action Group and district councillor, Anne Hawkesworth, who is urging residents to have their say on plans for 800 new homes

it is sent to the Government for independent scrutiny.

Ilkley Civic Society is among those calling on residents to speak out now before it is too late.

The Society said: "For many years this rural setting has been protected by Green

Belt legislation, but the Council is now saying that it needs to build houses on the rural edges of Ilkley in order to meet the growing population needs of the district. If we wish to retain Ilkley's countryside, and avoid urban sprawl, we all

need to say so now."

A councillors' drop-in session will be held at Ilkley Town Hall between 10am and 11am on Saturday, March 1, to assist residents. Civic Society representatives will be there to help.

Ward councillor and chairman of Wharfedale Planning Action Group, Anne Hawkesworth (Ind, Ilkley), said: "We have been awaiting this critical phase. At this point I am putting out a call for anyone with planning expertise who has concerns about over-development to come forward.

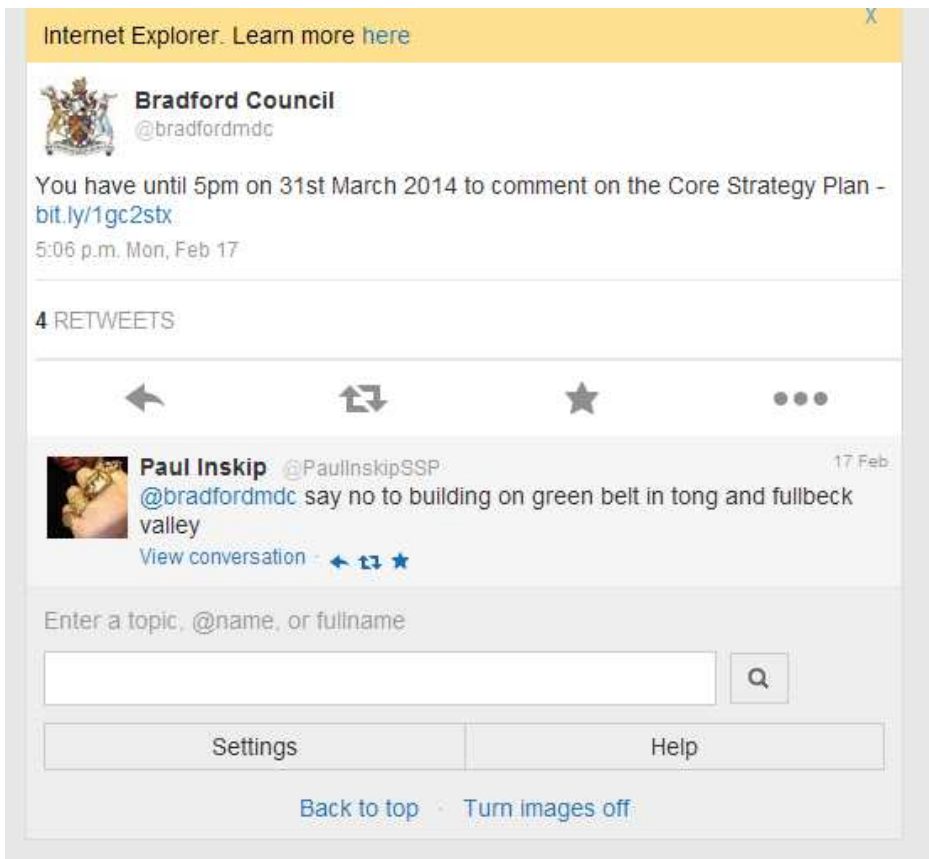
"The plan has to be challenged on soundness."

The Core Strategy: Publication Draft (2014) and associated documents are available to download at: bradford.gov.uk/LDF.


Representations must be made in writing and are strongly encouraged to be submitted electronically on the e-mail to: ldf.consultation@bradford.gov.uk or by post to: Local Plan Group, City of Bradford Metropolitan District Council, 2nd Floor South Jacobs Well, Nelson Street, Bradford BD1 5RW.

e-mail: amanda.greaves@gazetteandobserver.co.uk

Bradford MDC Twitter and Facebook Account Posts – Monday 17th February 2014



Internet Explorer. Learn more [here](#)


 **Bradford Council**
@bradfordmdc

You have until 5pm on 31st March 2014 to comment on the Core Strategy Plan - bit.ly/1gc2stx

5:06 p.m. Mon, Feb 17

4 RETWEETS

← ↻ ★ ⋮

 **Paul Inskip** @PaulInskipSSP 17 Feb
@bradfordmdc say no to building on green belt in tong and fullbeck valley

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 **Bradford Council** shared a link.
17 February near Bradford

The consultation on the Core Strategy Plan is available here. This consultation closes at 5pm on 31st March 2014.

 **Bradford Metropolitan District Council | The Development Plan for Bradford | Core Strategy DPD...**
www.bradford.gov.uk
Core Strategy DPD Publication Draft

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 Makin Dixon Solicitors, Joe Grint and Jane Wells like this.

Core Strategy DPD: Publication Draft
Statement of Pre-Submission Consultation (2014)

Appendix 5

City of Bradford Metropolitan District Council

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Environment and Planning

Core Strategy DPD Publication Draft

Core Strategy DPD Publication Draft

The Council sought comments on the Core Strategy Publication Draft Monday, between 17 February – Monday 31 March 2014, that it proposes to submit to the Secretary of State for public examination by an independent Planning Inspector.

The Core Strategy is intended to replace the strategic policies contained within the Replacement Unitary Development Plan (RUDP) adopted in 2005 and will provide a long term direction for future development and investment within the Bradford District over the next 15 years and beyond.

The Council, on 10th December 2013, resolved that the Publication Draft be published for formal representations and be submitted to the Government for examination.

This is was opportunity to comment on the Publication Draft and in particular on the following elements:


1. Legal compliance
2. Soundness of the Plan
3. Compliance with the Duty to Co-operate

These were explained in further detail within the 'Guidance Note to accompany the Representation Form'.

Consultation Document

- [Core Strategy DPD: Publication Draft](#)

Key Supporting Documents

- [Habitat Regulations Assessment](#)
- [Health Impact Assessment](#)
- [Sustainability Appraisal](#)
- [Background Documents](#)
- [Evidence Base](#)
-  [Publication Draft - Summary Leaflet \(1138kb\)](#)
-  [Equality Impact Assessment \(885kb\)](#)
-  [Soundness Self Assessment Checklist \(292kb\)](#)
-  [Legal Compliance Self Assessment Checklist \(1010kb\)](#)
-  [Engagement Plan \(231kb\)](#)
-  [Statement of the Representation Procedure \(15kb\)](#)
-  [Statement of Consultation - Further Engagement Draft \(2146kb\)](#)

Written Representations

It was strongly advised that the Core Strategy Publication Draft (2014) was read before making a written representation.

The official Representation Form was specifically designed to assist in making your representation to cover the matters the Inspector will consider in the report on the Plan.

The Council produced a separate guidance note and a list of 'frequently asked questions' to assist you in making your representation(s).

 [Representation Form \(303kb\)](#)

-  [Guidance Note to accompany the Representations Form \(66kb\)](#)
-  [Frequently asked questions \(66kb\)](#)

Viewing a copy of the Core Strategy Publication Draft

The Publication Draft along with the Core Strategy DPD background documents were available as reference copies at the following Council offices and Libraries across the Bradford District:

Council Offices - Mon-Thurs 9am-5pm; Fri 9am-4.30pm

- Bradford Planning Reception, Jacob's Well, Nelson Street, Bradford, BD1 5RW
- Shipley Town Hall, Kirkgate, Shipley, BD18 3EJ
- Keighley One Stop Shop, Town Hall, Bow Street, Keighley, BD2 3SX
- Ilkley Town Hall, Station Road, Ilkley, LS29 8HA (**By appointment only - Tues -Thurs 9.30am to 1pm*)

Libraries - Mon-Fri 9am-7pm; Sat 9am-5pm

- Bradford City Library, Centenary Square, Bradford, BD1 1NN
- Bradford Central Library, Princes Way, Bradford, BD1 1SD
- Shipley Library, 2 Wellcroft, Shipley, BD18 3QH

Appendix 5

- Bingley Library, Myrtle Walk, Bingley, BD16 1AW
- Keighley Library, North Street, Keighley, BD21 3SX
- Ilkley Library, Station Road, Ilkley, LS29 8HA

Written Representation

Completed Representation Form, preferably by email, to the Local Plan Group by:

Email to:

ldf.consultation@bradford.gov.uk;

Post to:

Bradford Local Plan Group
City of Bradford Metropolitan District Council
2nd Floor South, Jacob's Well
Nelson Street
Bradford
BD1 5RW

Further information

Further information about the Publication Draft or how to complete the representation form was available from the Local Plan Group on: 01274 433679.

It was stated that representation forms arrive no later than 5pm on Monday 31st March 2014.

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Plan-it Bradford

Issue 19

MARCH 2014

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



Core Strategy Publication Draft Consultation

17th February -
31st March 2014

The Council, on the 10th December 2013, resolved that the Publication Draft be published for formal representations and be submitted to the Government for Independent Examination.

The Core Strategy Publication Draft and key supporting documents were issued for representations on Monday 17th February 2014 for six weeks.

The Core Strategy has been amended since the previous Further Engagement Draft consultation in 2011/12. Changes have been made in response to representations received, the National Planning Policy Framework and the updated technical evidence.

A Summary Leaflet is now available on the website which provides a concise overview of the proposed strategy.

The Council will consider all representations it receives during this consultation period, and subject to the issues raised, will then submit the Core Strategy and the representations to the Government.

Once the Council has submitted the Core Strategy the Government will appoint an independent Planning

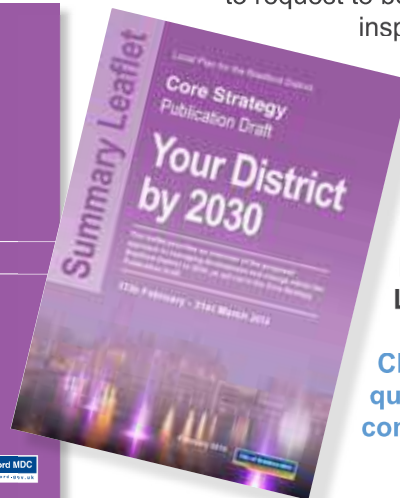
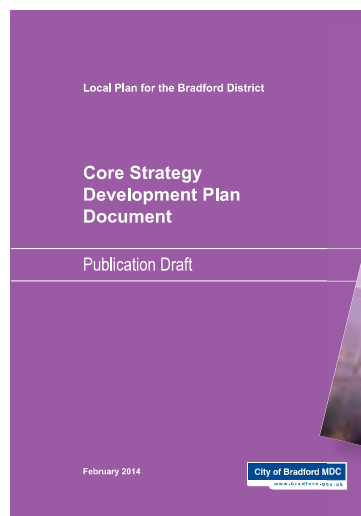
Inspector who will carry out an Examination.

The role of the inspector is to assess whether the plan has been prepared in accordance with the duty to cooperate, legal and procedural requirements, and whether it is sound.

Those persons who submitted a representation will have the right to request to be heard by the inspector at a round table hearing.

For further information on the Core Strategy, please visit: www.bradford.gov.uk/LDF.

[Click here for a quick link to the consultation page.](#)



www.bradford.gov.uk/LDF

*** Summary Leaflet now available online ***

Appendix 7A – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 1 – Introduction

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue.)</i>	Council's Response	Respondent
Section 1	What is the Local Plan?		
Para 1.2	Support for the plan period to 2030	Support noted.	369, 397, 400, 402

**Appendix 7B – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 2 – Background and Context**

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue.)</i>	Council's Response	Respondent
Section 2	Background and Context		
Paragraph 2.10 – 2.11	In relation to the evidence base to identify the needs and opportunities for sport and recreation there is no currently adopted Playing Pitch Strategy, Outdoor Sport Strategy or Indoor Sports Strategy	The Most up to date sports pitch assessment and strategy was produced in 2007 by KKP. The Council is in the process of updating the playing pitch assessment and strategy. Sport England fully engaged in this work.	200
Paragraph 2.59 – 2.60	To work positively with farmers for the benefit of the rural economy should mean that agricultural land should not be allocated for housing	The Plan is required to meet its objectively assessed needs and is proposing to do this in full in order to comply with NPPF. It is anticipated that this will required both Green Field and land currently designated Green Belt which may include agricultural land. The detailed selection of sites will be in the Allocations DPD.	152
Paragraph 2.60	Welcome the acknowledgement that the farming community play in delivering a positive rural economy	Comment noted.	187
Paragraph 2.61	Welcome the acknowledgement that flooding is not new and that the biggest risk is from heavy downpours and overflowing watercourses	Comment noted.	187
Paragraph 2.63 – 2.65	Provides a good summary of heritage assets	Comment noted.	103
Paragraph 2.66 – 2.67	Provides a good summary of cultural and tourist attractions	Comment noted.	103

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue.)</i>	Council's Response	Respondent
Section 3	Spatial Vision		
Spatial Vision	1A. Support for the vision in particularly the strong growth emphasis.	Noted.	447
Spatial Vision	1B. Support the Vision particularly the intention that the District's unique landscapes and heritage will have played a vital role in making places that encapsulate what makes Bradford so special.	Noted.	103
Spatial Vision	1C. Support for paragraphs 3.9 and 3.10 and intentions regards built heritage and mention of key localities of Saltaire, Haworth and Ilkley.	Noted.	103
Spatial Vision	2. Plan period to 2030 is 15 years from anticipated adoption. However allocations DPD will be adopted beyond this period, in conflict with NPPF. Plan period should run to 2031.	<p>The Local Development Scheme anticipates that the full set of DPDs being in place by April 2017 with the adoption of the Allocations DPD. The Core Strategy provides a clear 15 year plan period for strategic planning purposes. Given the scale of the anticipated uplift in Housing delivery and also the uncertainty of long terms housing projections it is clear that the monitoring of the plan is bound to point to the need for its review well within its period to take account of housing outputs and future household projections and to provide a firm basis for rolling forward the 5-year supply.</p> <p>There is absolutely no requirement within the NPPF to tie a 15 year plan period to the expected date of adoption of an Allocations DPD. Indeed the</p>	129

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

		NPPF doesn't even require a 15 year plan period as in some cases the NPPF allows for Local Planning Authority's to adopt a 10 year plan period. The plan cannot therefore be judged to be unsound on this matter.	
Spatial Vision	3. Vision is unsound as focuses development within City of Bradford without the evidence of what and how infrastructure will be delivered in support of development	It is appropriate for the City of Bradford to be the prime focus of development given its current and future role and also the needs of residents. The Core strategy is support by an Infrastructure Delivery Plan which as far as possible assesses the current infrastructure provision and future requirements to support the delivery of the plan. Section 6 of the Core Strategy sets out a range of policies in support of delivery of development.	519
Spatial Vision	4. Core Strategy is not deliverable and is unsound	The Strategy has been informed by robust and up to date evidence in line with NPPF. Deliverability has been considered in terms of both land supply and viability.	79
Section 3	Objectives		
Objectives	1. Support for strategic objectives in particular those support development and growth such as 1,2 and 3	Noted.	407, 431
Objectives	2. Plan objectives should include a reference to sustainability. Propose amendment to objective 5 supporting energy efficient homes.	Objective 13 sets out priorities for climate change for the plan and which will apply where necessary and appropriate to all forms of development. Policy HO9 sets out the standards for housing development including the approach to energy efficiency.	192
Objectives	3. Objective 2 seeks to Prioritise the development of previously developed land	Objective2 seeks to ensure that development is sustainably located as its prime aim. It does seek	396, 397, 400, 402, 437

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

	<p>which does not accord with the NPPF paragraph 17 core planning principles of which the eighth principle refers only to the encouragement of the use of previously developed land.</p>	<p>to prioritise the use of PDL but qualifies this with the need to ensure that such sites are deliverable and developable.</p> <p>It is not considered that the policy is inconsistent with the NPPF either in its detail or in terms of the principle underpinning it.</p> <p>It is quite correct to say that the wording used in the NPPF is encouraging the use of PDL. However such encouragement cannot be realised unless the Council and other public agencies take action via their plans, policies or programmes to stimulate such development. This can include prioritising the use of such development opportunities.</p>	
Objectives	<p>4. Strategic Objective 15 is currently not consistent with the Spatial Vision (set out in 3.15) or the NPPF (paragraph 109) as there is no commitment to try to enhance biodiversity assets but just to manage and safeguard what is already there. Add reference to enhance</p>	<p>Objective 15 clearly states that the Plan should seek to ‘safeguard and enhance the District’s biodiversity assets’. Objective as written already addresses the issue.</p>	481
Objectives	<p>5. Plan is contrary to its own objectives</p>	<p>The Objectives seek to deliver the vision. The plan sets out a set of policies to meet the plan objectives. There are tensions between objectives and where possible the policies set out how these tensions will be managed across policy areas.</p> <p>Objectives should not be read in isolation and should be considered within context of the plan as a whole.</p>	403
Objectives	<p>6. Plans for Ilkley, a settlement with limited employment offer, does not reduce the need to travel as set out in objective 2.</p>	<p>The Plan objectives need to be read as a whole. The other objectives recognise the need to ensure improved infrastructure including transport.</p>	133, 140, 143, 148, 385, 403, 465

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

		Ilkley is a Principal town with significant existing employment offer already, in particular within the service sector.	
Objectives	7. Contrary to objective 3, existing infrastructure needs are not being met. Plan does not meet Sustainability Appraisal objectives due to the scale of development and mitigation.	The Objective is reasonable and appropriate. The objective is delivered through several policies within the Core Strategy. The Local Infrastructure Plan sets out the current overview of the adequacy of infrastructure and the implications of future development strategy. It also identifies the funding opportunities to support infrastructure within the plan period.	74
Objectives	8. The Strategic Objective 6 for the economy should also include specific reference to the intention to realise the full potential which tourism can make to the economy of the District.	Objective 6 is specific to key economic sectors. The suggested change is not appropriate to this objective as written. Tourism is not explicitly mentioned in the objectives but is dealt with through relevant policies within the plan within the context of the broad framework of the objectives.	103
Objectives	9. support Objective 12 which will assist in the delivery of the Vision that the District's heritage will have played a vital role in making places that encapsulate what makes Bradford so special.	Noted.	103
Policy P1	Presumption in favour of sustainable development		
P1	1. Support for policy	Noted.	186, 188, 407, 415, 431, 444, 447, 495, 510, 512
P1	2. Clarity needed on how developers will comply with the policy	The policy is based upon the PINS recommended standard policy and reflects NPPF presumption.	179
P1	3. The plan conflicts with NPPF paragraph 14 with regards to the adverse effects outweighing	The policy sets out the high level requirement of Paragraph 14 of NPPF. The plan should be read	142, 144, 151, 183, 336, 367,

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

	the benefits of development, therefore is not sustainable.	as a whole. The SA/SEA sets out the appraisal of the chosen approach.	370
P1	4. Building 800 new homes in Ilkley and 1600 new homes in Wharfedale is not sustainable and contrary to the NPPF and Policy P1	The NPPF requires that LPAs plan to meet their Objectively assessed housing need in full. The SA/SEA sets out the appraisal of the chosen approach. This recognises the need for homes and jobs which contribute to sustainable development in their own right as well as sustainable communities.	7, 8, 10, 15, 18, 19, 20, 21, 30, 31, 41, 46, 119, 120, 148, 155, 169, 180, 232, 358, 359, 449, 441, 450, 453, 454, 469, 470, 472, 473, 502
Policy SC1	Overall Approach and Key Spatial Priorities		
SC1	1. Support for policy	Noted.	123, 188, 431, 170
SC1	1a. support for Criterion 7 and 9.	Noted.	123
SC1	1b. Support for policy specifically focus of development within City of Bradford	Noted.	431
	1c. Support for protection and enhancement of Ilkley and need for quality development	Noted.	170
SC1	1d. Support for transformational content of policy and role of principal towns and Local growth centres	Noted	447
SC1	1e. Support for role of Local Growth centres such as Silsden	Noted.	517
SC1	1f. Support criteria 4 which recognises the importance of LBIA	Noted.	487
SC1	1g. Support for criterion B7 and B11.	Noted	103
SC1	1h. Support for paragraphs 3.22 and 3.28	Noted.	103
SC1	2. Policy does not contain any information regarding Economic Growth Areas as identified key diagram. It is considered that the policy	The Economic Growth Areas are derived from SC1, specifically sub section 1, 'transformation of economic conditions together with sub section 5,	444

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

	<p>should be amended to include a definition as to what the Council is seeking to achieve within Economic Growth Areas, in addition to providing a clear indication as to where such areas are being proposed. Wording proposed.</p>	<p>enhancement of the principal town and local growth centres as hubs for their local economy. They follow through from the spatial vision and objectives for the main sub areas of the district. The Key Diagram broadly identifies the location of these centres rather than determining an appropriate economic function. It is geographically indicative rather than definitive. The allocations DPD will look more closely at specific defined locations for economic intervention, such as strategic employment locations or sites for new industrial development or other specific forms of commercial enterprise. The Allocations DPD will assess the prime economic functions of these areas and how they may contribute to the economic advancement of the district. Whilst at this stage this approach is very broad in strategic terms, it does not in any way undermine the soundness of the Local Plan.</p>	
SC1	3. Infrastructure to support development		
SC1	<p>3a. The core strategy does not set out clearly how the district and local infrastructure required to support development will be delivered in particular the funding sources including the use of section 106 agreements.</p>	<p>The Core Strategy is supported by the Infrastructure Delivery Plan. This has been produced in consultation with infrastructure providers. it provides the most up to date information on the infrastructure requirements to support growth in the district and as far as it is able establish the costs and possible methods of funding. However, given the time period of the plan not all infrastructure will have identified or committed funding. The Core Strategy itself will inform the planning by partners of infrastructure spending plans over the plan period. The infrastructure delivery plan did not identify any</p>	135, 342

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

		<p>infrastructure issues which could not be dealt with within the plan period.</p> <p>Section 6 of the Core Strategy sets out a series of policies which support the delivery of the development strategy. They include policies on financial contributions as well as other mechanisms for funding growth and development.</p>	
SC1	3b. Concern over levels of development in City of Bradford and inadequate infrastructure, in particular the eastern edge of the city adjoining Leeds should have no further proposed housing development	<p>See response above.</p> <p>The Infrastructure Delivery plan does identify significant infrastructure requirement to support development in Bradford. This includes a range of significant range of transport improvements many of which are part of the West Yorkshire Transport fund Plus programme.</p>	519
SC1	4. The plan should be amended to increase the amount of green recreational space in the City.	<p>Policies SC6 support the role of green infrastructure. Policy EN1 sets out the approach to provision of new open space including recreational such as playing pitches.</p> <p>Appendix 9 sets out the space standards. The Allocations DPF will identify both sites for ongoing protection but also where required to meet future needs will identify new sites or requirements for provision on larger sites.</p>	519
SC1	5. The plan should prioritise before release of green space and green belt, the bringing back into use as housing former listed commercial buildings to be found across the District in particular the City Centre.	<p>The Core Strategy does seek to encourage the re use and redevelopment of previously developed land where deliverable, as set out in Policy SC5 and also HO6.</p> <p>However, based on the land supply evidence the districts Housing Requirement in policy HO1</p>	519

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

		cannot be delivered without the contribution of both green field land and also green belt.	
SC1	6. Plan should support strengthening green belt and green space on eastern edge of the city and as alternative explore further market towns in the Aire valley	<p>Policy SC7 sets out the approach to green belt protection. It recognises the need to undertake a review of the green belt under exceptional circumstances to meet in full the development needs of the District. Criterion B of policy SC7 sets out the key considerations for any review in particular the National Green Belt purposes as well as the strategic function.</p> <p>The preparation of the Core Strategy has considered all reasonable alternatives. The Council do not consider that there is an immediately obvious location for a new settlement within the District in a location which offers the quantity of land and in an environmentally unconstrained and in an sustainable location.</p>	519
SC1	7. No evidence of how point B 3 will be delivered and how Bradford has worked with other Councils in support of regeneration within LCR	<p>The District plays a key role within the Leeds City Region. The policy recognises this in terms of both existing economic development and labour supply and set out a high level aspiration to develop this further through future development and growth as well as investment in infrastructure.</p> <p>The Leeds City Region LEP Strategic Economic Plan as approved by Government July 2014 sets out a range of interventions to support the development of LCR. A significant number of proposals within the SEP are within or will benefit Bradford.</p> <p>The Duty to Cooperate Statement sets out further</p>	179

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

		information on the Leeds City Region and the work undertaken in support of Duty to cooperate.	
SC1	8. Object to reference to Ilkley as Principal Town under B5	Ilkley was identified as a principal town in the now Revoked Regional Spatial Strategy. Further work by Bradford through the settlement study informed the settlement hierarchy within the Core Strategy. This confirmed the importance of Ilkley as a principal town in terms of its range of facilities size and role. See also response SC4 9A below.	170
SC1	9. Policy seeks to achieve more sustainable patterns of growth and movement. However, Policy and its justification do not adequately seek to distribute housing and jobs in a balanced form.	The housing distribution set out in Policy HO3 is based upon the settlement hierarchy in SC4. This recognises the scale of existing infrastructure and services in different settlements as well as the ability of those settlements to also grow in a sustainable manner with careful planning. To this end the City of Bradford is proposed to deliver the highest percentage of development.	406
SC1	10. Criterion B.5 sets out the role of Ilkley as a Principal Town. However the roles of Principal Towns are not explained at this point.	The plan needs to be read as a whole. The settlement hierarchy is clearly set out in policy SC4 with further detail linked to the differing circumstances in different settlements in the sub area policies.	406
SC1	11. The NPPF (paragraphs 17 and 23) requires objectively assessed needs for retail and other town centre uses to be met in full in and in accordance with the sequential approach. The NPPF (paragraph 23) also requires local plans to “support” the vitality and viability of town centres. Policy SC1, Part B5 does not reflect the wording used in the NPPF.	The Core Strategy is seeking to support the vitality and viability of town centres and positively meet the objectively assessed needs for retail and other town centres in full. Policy SC1 must be considered alongside other policies, in particular SC4 and EC5. Policy SC1.B5 does not refer to the network and hierarchy of retail centres. Policy SC1.B5 only refers to the Principal Towns of Ilkley, Keighley and	430

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

		<p>Bingley and the Local Growth Centres of Queensbury, Thornton, Silsden and Steeton with Eastburn.</p> <p>However Strategic Core Policy SC4 Hierarchy of Settlements is in accordance with the NPPF Paragraph 17 and 23 as it seeks to plan for economic growth proactively, meet local needs and enhance the vitality and viability of town centres and supports economic diversification.</p>	
SC1	<p>12. B6 seeks to unnecessarily restrict development in Local Service Centres. It should be amended to allow an appropriate scale of development to sustain the Centre and services within it.</p>	<p>The Core Strategy is seeking to positively plan to meet its objectively assessed housing need. It is proposing to release land for over 42,100 new homes and planning to do so via the creation of new growth areas, the regeneration of the City Centre and the creation of a new urban extension at Holme Wood. Positively planning for need involves not only providing for the right number of new homes but as far as possible locating those homes in or close to the areas of greatest need. Those housing needs are most acutely focused in the areas which are likely to see the greatest levels of population change which are in the larger urban centres and not in the smaller villages. In meeting this need, the plan has sought to ensure a sustainable development strategy in line with NPPF Core Planning Principles. This strategy recognises the differing roles of settlement and their abilities to develop in a sustainable way. Policy SC4 therefore sets out broad planning strategy as to how different categories of settlement can and should grow. This is supported by more detailed guidance in the sub area policies.</p>	512

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

		Policy SC4 recognises that the Local Service centres should receive more controlled levels of development than the other settlements higher up in the hierarchy.	
SC1	13. Strategy is not justified as the most appropriate strategy when considered against reasonable alternatives	Policy SC1 sets out the high level strategy in support of the vision and objectives. The policy needs to be read with the other core policies as well as the more detailed supporting policies contained in the Core Strategy. The preparation of the Core Strategy considered a range of reasonable alternatives as part of the early stages of its development The SA/SEA sets out the assessment of the Chosen strategy and the alternatives. Details of the stages of consultation are set out in the background paper 1.	341
Policy SC2	Climate Change and Resource Use		
SC2	1. Support for policy	Noted.	123, 447
SC2	2. YW and EA should be listed as key bodies in implementation of the policy	It is noted that they are relevant bodies in the context. The list of bodies not exhaustive and indicative only.	123
SC2	3. Support for criterion SC2 (A) given the current pressures in Ilkley Haworth and Saltaire.	Noted.	170
SC2	4. Some support for the policy, although it fails to support the need for a balanced distribution of jobs and housing.	It is considered that B1, 2 and 3 adequately address this issue in the context of resource use and climate change.	406
SC2	5. At SC B2 the policy seeks to support opportunities to deliver green infrastructure but the policy should equally set out the need to protect the existing elements that provide resilience.	The need to protect existing elements is addressed in SC6 relating to green infrastructure, which identifies achieving greater resilience to climate change as a driver and influence on areas of opportunity.	406

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

SC2	6. Broad support but the policy lacks indicators and targets to give it weight.	SC2 is a strategic level policy. Links are identified in the text with a range of other more detailed policies. Indicators are identified in a number of these more detailed policies and in the sustainability appraisal that will contribute towards assessment of this policy.	394
Policy SC3	Working together to make Great Places		
SC3	1. Support for policy	Noted.	123, 188, 495, 510
SC3	2. Note need for ongoing consideration across LPA boundaries on alignment of housing delivery and also flood risk management	The Council is committed to ongoing work with adjoining local authorities and other bodies. The purpose of the policy is to capture this commitment.	123
SC3	3. Part B1 should be strengthened to ensure effective cross boundary coordination of development. Suggest wording.	Part B of the Policy sets out high level aim and is supported by an indication of the current sub regional working. More detail is provided in the 'Duty to Cooperate Statement.	135
SC3	4. Highlight key strategic issues with adjoining LPAs in particular Leeds and need to ensure effective duty to cooperate compliance in addressing cross boundary local plan coordination including on key corridors such as A65.	The Council recognises the various strategic issues and relationships with adjoining local authority areas and their respective Local plans. The Duty to Cooperate Statement sets out the work to date to understand these issues and how key bodies have been engaged in the preparation of the plan including how this has informed the content and approach. The Council is committed ongoing work with adjoining LPAs and bodies through the implementation of the Local plan and also the	170, 342

**Appendix 7C – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 3 – Vision, Objectives and Strategic Core Policies**

		<p>preparation of the other DPDs which will make up the Local Plan.</p> <p>Ongoing strategic coordination is also through the Leeds City Region governance and related work streams.</p>	
SC3	<p>5. Past scales of development have been developed without adequate consideration of cross boundary impacts adjoining communities for example at Menston with the High Royds Hospital development. Paragraph B1 needs strengthening</p>	<p>Part B of the Policy sets out high level aim and is supported by an indication of the current sub regional working. As set out the policy is appropriate and reasonable and does not require any further strengthening.</p> <p>More detail is provided in the 'Duty to Cooperate Statement which sets out the work on the Core Strategy in support of the Core Strategy.</p>	342
SC3	<p>6. The criteria are overly technical and not easily understandable by the public and communities undertaking neighbourhood planning Policy should be supported by clearer purposes and examples.</p>	<p>The policy wording uses appropriate planning terminology. The purpose of the policy is clearly stated to ensure that strategic issues are appropriately considered and coordinated.</p> <p>The Duty to cooperate Statement provides more detail on how the Council will discharge the duty.</p> <p>The Council under its duty to support local communities preparing Neighbourhood plans will seek to clearly set out key policies and their purpose as appropriate to the content of the relevant Neighbourhood plan.</p>	394
SC3	<p>7. The Background Paper on the Duty to Cooperate has not been published.</p>	<p>Background Paper 1 set out the key elements of how the Council had undertaken the Duty to Cooperate.</p> <p>The Council has prepared an up to date Duty to</p>	101

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		Cooperate Statement which documents in more detail how the Council has met the requirement up to submission of the Plan.	
SC3	<p>8. There is not sufficient evidence of effective cross boundary working with neighbouring local authorities, or agreement with those authorities, particularly on;</p> <ul style="list-style-type: none"> • Scale and location of new homes • Effect of large scale green belt releases including an urban extension at Holme Wood • Impact on Infrastructure; highways, watercourses, health, education 	<p>The Duty to Cooperate Statement sets out the work up to submission in support of the Core Strategy. This demonstrates significant ongoing work with key bodies including adjoining LPAs.</p> <p>Adjoining LPAS such as Leeds and Kirklees in context of Holme Wood Urban extension have been positively engaged prior to submission. While issues are noted these will be considered in more detail as part of the Allocations DPD.</p>	44, 101,338
SC3	<p>9. There is no evidence of compliance with the Duty to Cooperate, particularly with regard to:</p> <ul style="list-style-type: none"> • Other local authorities, • Health authorities • Water company's • Environment Agency • Local bodies such as Driglington and Gildersholme Parish as well as Councils Pudsey Pacers Running Club. 	<p>The Duty to Cooperate Statement sets out the work up to submission in support of the Core Strategy. This demonstrates significant ongoing work with key bodies including adjoining LPAs.</p> <p>Several of the named bodies are not bodies which are subject to the Duty to cooperate being local organisations.</p>	44, 45, 54, 56, 75, 76, 77, 78, 86, 95, 99, 100, 122, 130, 133, 134, 173, 176, 181,193, 195, 196, 207, 215, 236, 338, 345, 356, 362, 380, 387, 414, 417, 422, 432, 455, 456, 457, 458, 475, 479, 482, 499, 515,
SC3	<p>10. No evidence of dialogue with North Yorkshire County Council particularly on:</p> <ul style="list-style-type: none"> • Schools • Sewerage system/drainage 	The Duty to Cooperate Statement sets out the work up to submission in support of the Core Strategy. This demonstrates significant ongoing work with key bodies including adjoining LPAs.	84
SC3	11. The plan conflicts with NPPF paragraphs	The Duty to Cooperate Statement sets out the	115, 120, 183,

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	52/54 as there has been no co-operation with neighbouring communities to develop new towns / garden cities, an alternative to green belt changes	work up to submission in support of the Core Strategy. This demonstrates significant ongoing work with key bodies including adjoining LPAs. The Core Strategy seeks to meet its objectively assessed needs in full within the district as required by NPPF and is not looking for other LPAs to meet any shortfall.	336, 367, 370, 516
SC3	12. There is no / lack of evidence that CBMDC has cooperated with Leeds City Council over the effect of overall housing numbers on the A65 which is already congested	The Duty to Cooperate Statement sets out the work up to submission in support of the Core Strategy. This demonstrates significant ongoing work with key bodies including adjoining LPAs such as Leeds. Work will continue under the duty as both LPAS progress their respective Allocations DPD.	8, 10, 15, 17, 18, 19, 20, 23, 30, 31, 35, 48, 67, 70, 71, 72, 74, 87, 92, 116, 122, 131, 149, 155, 203, 204, 218, 329, 333, 337, 362, 376, 405, 411, 465
SC3	13. No account taken of 600 houses at High Royds (Leeds) and the impact on Menston	See response to issue SC3 (5) above.	25
SC3	14. The Habitats Regulations Assessment and Core Strategy does not make it clear which bodies have been consulted. North Yorkshire County Council, Nidderdale AONB, Yorkshire Dales National Park, Wharfedale Naturalists and Bradford Ornithological Group should have been consulted	The Statement of consultation set out the details of all consultations at relevant milestones	159
Policy SC4	Hierarchy of Settlements		
SC4	1. General support for the identification of general tiers of the settlement hierarchy	Noted.	444, 447
SC4	2a. Support for Policy including: • focus of development ton Regional City of	Noted	188, 190, 431, 510

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	Bradford • Improvement of transport and connectivity		
SC4	2b. Support for policy SC4 Regional City, Criterion B.2 to develop a strong sense of place which reinforces the distinct local identity of the area with a high-quality public realm and well designed buildings.	Noted.	103
SC4 (C)	2c. Principal Towns, Criterion C which acknowledges that the character and setting of these settlements is defined by their biodiversity, landscape and heritage assets and the requirement that, in identifying their potential for growth, this will be informed by the existing scale of the settlement and the contribution made by, and importance of, its environmental assets.	Noted	103
SC4	3. Support for regional city as focus for development subject to some revisions linked to HO3 on scale of development to address issues of deliverability and viability	Noted.	447
SC4	4. Target in support of policy looks for 60% of development in City of Bradford but is 68% in paragraph 3.62.need for clarity in figures.	Policy HO3 assigns 68% of the total housing requirement to the Regional City. The wording within the table on page 43 refers to 'more than 60%'	170
SC4	5. Support paragraphs 3.68 -370 and role of principal towns in supporting growth	Noted.	447
SC4	6. Support identification of Bingley as Principal Town	Noted	186, 396
SC4	7. Support for identification of Ilkley as a principal town	Noted.	400
	8. Support for roles identified for 3 principal towns in A and B	Noted.	447
SC4	9 A. The classification of Ilkley as a Principal	Ilkley was identified as a principal town in the now	

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	<p>Town is not justified and supported by evidence in particular size in terms of population, economic and social make up and range of services.</p> <p>Settlement should be a local service centre.</p>	<p>Revoked Regional Spatial Strategy. The RSS settlement hierarchy was tested at examination and the Council do not consider this work as unsound. The RSS work and RUDP was the start point for the hierarchy in the Core Strategy. Further work by Bradford through the settlement study informed the settlement hierarchy within the Core Strategy. This confirmed the importance of Ilkley as a principal town in terms of it range of facilities size and role.</p> <p>It is clearly incorrect to suggest that Ilkley, given its size, and role within Wharfedale and importance as a centre for services and tourism should be classified in the same tier of the settlement hierarchy as settlements such as East Morton, Oxenhope and Denholme.</p> <p>With the exception of Baildon the Local Service Centres range in size from 1,309 to 5,826. Ilkley has a population of 14,394.</p>	<p>2, 7, 8, 10, 15, 17, 18, 19, 20, 21, 22, 23, 30, 31, 41, 46, 67, 72, 74, 87, 88, 115, 116, 118, 119, 120, 131, 133, 137, 155, 158, 159, 169, 170, 204, 217, 218, 254, 269, 302, 303, 305, 306, 317, 319, 327, 333, 334, 337, 341, 346, 352, 360, 364, 367, 368, 369, 370, 375, 377, 378, 385, 403, 405, 411, 426, 443, 449, 450, 467, 473, 480, 516, 518, 522</p>
SC4	<p>9 B. The identification of Ilkley as Principal Town is based on the RSS and its flawed evidence base. Ilkleys role other than a focus for housing is not made clear in contrast to policy YH5 of the RSS.</p>	<p>Ilkley was identified as a principal town in the now Revoked Regional Spatial Strategy. The RSS settlement hierarchy was tested at examination and the Council do not consider this work as unsound. The RSS work and RUDP was the start point for the hierarchy in the Core Strategy. Further work by Bradford through the settlement study informed the settlement hierarchy within the Core Strategy. This confirmed the importance of Ilkley as a principal town in terms of it range of</p>	<p>406</p>

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		<p>facilities size and role.</p> <p>The future role of Ilkley is set out in more detail in the Sub area policy WD1 and WD2 and supporting text, in particular paragraph 4.3.2.</p>	
SC4	<p>10. Ilkley is not a focus for the rural hinterland. That focus has always traditionally been Otley and/or Skipton. There is no requirement for Ilkley to be an employment hub and, accordingly, the housing provision should be reduced. Ilkley should be downgraded to a Local Service Centre.</p>	<p>See comments above under 9A and 9B.</p>	406
SC4	<p>11. The distribution of houses does not reflect Ilkley's position in the settlement hierarchy.</p>	<p>Ilkley is a sustainable location which provides a range of facilities, services and employment opportunities to the area. This is reflected by its classification as a Principal Town within the settlement hierarchy. However the quantum of housing proposed in the area also has to reflect the pattern of key environmental constraints and also the land supply. The placement of a settlement within a particular tier of the settlement hierarchy does not and should not lead to a specific minimum number of dwellings irrespective of other evidence.</p> <p>The Council considers that the development of 800 new homes together with additional employment allocations and investment in local services will support Ilkley's role as a Principal Town.</p> <p>The level of housing development proposed in Ilkley is significantly in excess of what has been planned for in previous plans, would require one or more expansion areas / green belt deletions.</p>	400

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		Together with proposed employment development and community facilities this would represent a level of growth which reflects the settlement's role and function.	
SC4	12. Support for identification of Local Growth centres as sustainable places for further development including Queensbury, Thornton and Steeton with Eastburn and Silsden	Noted.	129, 396, 400, 447, 517
SC4	13. Suggest policy should emphasise the need for housing growth as part of growth in Local Growth centres such as Silsden	Criterion (A) already emphasises the role of the Local Growth Centres as making a significant contribution to meeting the District's housing need. The Policy should also be read in conjunction with the relevant Sub Area Policies Ad1 and AD2 , as well as paragraph 4.2.4, which provide more detail on the strategy for Silsden.	517
SC4	14a. Support for the identification of Local Service areas including Haworth and Addingham and Menston	Noted.	108, 111, 415
SC4	14b Support for smaller scale development based on local need for market and affordable housing	Noted.	468
SC4	14c Support for Local Service Centres and Rural Areas specifically criterion 1	Noted	103
SC4	15. Object to the downgrading of Burley in Wharfedale from a Local Growth centre to a Local Service centre and the related reduction in housing figure for the settlement. The downgrading is not justified by the evidence of the HRA . Burley is a sustainable location with capacity to grow. Burley has a comparable size of population and services as other Local growth centres and also land available for	Paragraph 3.59 of the CSPD states that the third tier of the settlements hierarchy – that of Local Growth Centres – was created for two reasons. Firstly in recognition that there are significant differences in the settlements in what would otherwise be the lowest tier with some offering more sustainable options for growth because of their role, services and location and secondly because of the land supply constraints in the upper	81, 397, 402, 495

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	future development.	<p>two tiers. The latter of these two justifications is arguably slightly less of a factor due to the increase in land supply across the district between the first SHLAA and the SHLAA update.</p> <p>It is therefore acknowledged that Burley In Wharfedale would be a relatively sustainable location for housing growth if other factors suggested that growth in the area would be an appropriate option.</p> <p>However the Council are required to propose a strategy for meeting housing need which would be acceptable in terms of the potential direct and indirect impacts on the S Pennines SPA & SAC. The Council were therefore justified in looking to reduce the scale of growth within the 2.5km buffer zone within which Burley is located. .As a result of the reduction in the housing target for Burley, the Council considers that it cannot be identified as a growth area in Policy HO2 and should not be designated as a Local Growth Centre in Policy SC5</p>	
SC4	16a. The emphasis that Local Service Centres is for smaller scale developments which meet local needs is not positively planning for housing and preclude other more appropriate sites.	<p>The Core Strategy is seeking to positively plan to meet its objectively assessed housing need. It is proposing to release land for over 42,100 new homes and planning to do so via the creation of new growth areas, the regeneration of the City Centre and the creation of a new urban extension at Holme Wood. Positively planning for need involves not only providing for the right number of new homes but as far as possible locating those homes in or close to the areas of greatest need. Those housing needs are most acutely focused in</p>	437

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		<p>the areas which are likely to see the greatest levels of population change which are in the larger urban centres and not in the smaller villages. In meeting this need, the plan has sought to ensure a sustainable development strategy in line with NPPF Core Planning Principles. This strategy recognises the differing roles of settlement and their abilities to develop in a sustainable way. Policy SC4 therefore sets out broad planning strategy as to how different categories of settlement can and should grow. This is supported by more detailed guidance in the sub area policies.</p> <p>Policy SC4 recognises that the Local Service centres should receive more controlled levels of development than the other settlements higher up in the hierarchy.</p>	
SC4	16b. Restriction of Local Service centres is inappropriate and the policy should be amended as well as supporting text at paragraph 3.75	See response above to 16A.	512
SC4	16c. Paragraph 3.75 suggest that Local Service Centres will have a slower scale and pace of development. It is inappropriate to restrict the pace of meeting local needs to later in plan period.	The policy does not restrict the development to any period within the plan. The supporting text is purely making a distinction regarding the different scale of development within Local Service centres compared with the settlements higher up in the hierarchy.	437
SC4	17. Paragraph 3.78 recognises the importance of Haworth and the need to protect its character. However this should not be used to impose a blanket requirement.	Criterion 1 under Local Service Centres supports good quality design and need to protect and enhance local character. The policy does not impose a blanket design solution but rather notes the need for care when designing schemes in these settlements and in particular with key	108

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		heritage areas such as Haworth.	
SC4	18. Object to negative implications of wording in second sentence under C. Text should be amended to better reflect positive approach in sub policy 5 supporting creation and enhancement of green infrastructure	The sentence is purely a reference to some considerations which will need to be considered in determining levels of growth in these settlements. Other policies of the plan need to be read to understand how this has been used to inform the scales of development and how it will be considered in making allocations.	447
SC4	19. Policy is not evidenced and is not supported by a infrastructure delivery plan	<p>The start point for the settlement hierarchy was the approach established in the now Revoked Regional Spatial Strategy. The RSS settlement hierarchy was tested at examination and the Council do not consider this work as unsound. The RSS work and RUDP was the start point for the hierarchy in the Core Strategy. Further work by Bradford through the settlement study informed the settlement hierarchy within the Core Strategy. This resulted in an addition of Bingley as a the Principal Town. In order to deliver the future development needs the Core Strategy also added another tier to the settlement hierarchy the ‘Local Growth Centres’.</p> <p>Settlement Hierarchy reflects concentrations of existing infrastructure and services.</p> <p>The Core Strategy is supported by the Local Infrastructure Plan. This has been produced in consultation with infrastructure providers. it provides the most up to date information on the infrastructure requirements to support growth in the district and as far as it is able establish the costs and possible methods of funding. However, given</p>	179

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		the time period of the plan not all infrastructure will have identified or committed funding. The Core Strategy itself will inform the planning by partners of infrastructure spending plans over the plan period. The infrastructure delivery plan did not identify any infrastructure issues which could not be dealt with within the plan period.	
SC4 (C)	20A. Criterion C should apply to all levels of the hierarchy	<p>The considerations were explicitly identified in the Principal Towns given the anticipated growth and also the local characteristics of the settlements.</p> <p>The considerations for the scales of housing development are set out in Policy HO3 which recognises the full range of considerations when determining the scales of development for each settlement in the Hierarchy.</p> <p>Policy Ho7 sets out the key principles for allocating land for housing development. These include a range of considerations which will apply to all settlements irrespective of the level in the hierarchy.</p>	394
SC4 (C)	<p>20B. Object to Local Growth Centres, Criterion B.</p> <p>Paragraph 3.73 sets out an intention that growth and change within these settlements should not detract from their character and distinctiveness. It identifies particular aspects of these settlements that should be protected wherever possible including their valued open spaces, together with their historic buildings and their settings.</p>	<p>See response to 20A above. This issue is flagged explicitly within the policy for Principal Towns. However, the plan needs to be read as a whole and these considerations will be considered as part of any decision on allocations.</p>	103

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	However, this requirement is not included within this part of Policy SC4.		
SC4	21. Criterion C requires more evidence on the role of biodiversity, landscape and heritage assets in defining the character of settlements and form of and impact of new development. on settlement character	The Core Strategy is based on proportionate and robust and up to date evidence. In particular: <ul style="list-style-type: none"> • Landscape Character Assessment • Settlement Study • Growth study • HRA 	394
SC4	22. Plan should include a clear rationale for any proposed Green Belt changes based on their measurable, positive contribution to the character and function of settlements, that can be fully scrutinised by affected communities	Policy SC7 sets out the need for a green belt review and the exceptional circumstances. It also sets out the key considerations when determining releases from green belt based upon the key purposes of green belt. The Growth study has provided a high level review of all settlements and the immediate area of potential. This examined a range of constraints and information. A detailed methodology for the review of the green belt required under policy SC7 will be produced and consulted upon as part of the Allocations DPD.	394
SC4	23 NPPF (paragraphs 17 and 23) requires objectively assessed needs for retail and other town centre uses to be met in full in and in accordance with the sequential approach. The NPPF (paragraph 23) also requires local plans to “support” the vitality and viability of town centres. Policy SC4 reference to “Planning decisions as well as plans, strategies, investment decisions and programmes should:	Strategic Core Policy SC4 Hierarchy of Settlements is in general conformity with the NPPF Paragraph 17 and 23 as it seeks to plan for economic growth proactively, meet local needs and enhance the vitality and viability of town centres and supports economic diversification.	430

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	<p><i>“4. Enhance the vitality and viability of their town centres” does not reflect the terms of the NPPF.</i></p>		
SC4	<p>24. Object to Paragraph 3.65, line 4.</p> <p>The use of the term “unwelcome” could, possibly, be used to justify removal of buildings which contributed to the character of the District but were “unwelcome” to that particular applicant simply because they prevented them achieving what they wanted to do to the building. Minor change proposed to provide clarification.</p>	<p>The Council note the concern raised. The text as written is not unsound. The Change proposed would make the plan clearer in terms of intent but is not required to make the plan sound.</p>	103
Policy SC5	Location of Development		
SC5	<p>1. Support for policy including use of PDL are first priority</p>	<p>Noted.</p>	<p>111, 123, 160, 170, 407, 431, 444, 507</p>
SC5	<p>2. Part A adopts a sequential approach prioritising PDL which is not in compliance with NPPF (paragraph 47) and would not provide sufficient flexibility.</p> <p>Support for encouraging use of PDL but policy should ensure sites are deliverable and developable.</p> <p>Delete A and use part B. delete A1 and merge with A2 with first priority being land within settlements.</p>	<p>The policy sets out a high level sequence for determining the land supply.</p> <p>Policy SC5 seeks to give direction to the process of identifying sites and locations to meet the districts development needs by reference to two key criteria.</p> <p>Firstly to a locations’ position either within or on the edge of a settlement on the basis that in most cases locations within settlements are likely to have better access to existing services, infrastructure and employment opportunities.</p> <p>Secondly to a locations’ status as either green field or previously developed on the basis that the use</p>	<p>105, 108, 129, 396, 397,400, 402, 423, 437, 447, 512</p>

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		<p>of previously developed sites will both offer greater secondary benefits in regenerating and improving an area and secondly will help to reduce the need to utilise valued green spaces.</p> <p>It is important that Policy SC5 is read not in isolation but in conjunction other key policies in particular Policies HO6 and HO7. Both Policy SC5 and the policies within the housing chapter recognise that sites and locations must offer deliverable or developable options for development.</p> <p>The prioritisation of brown field sites will only take place once the range of site options have been narrowed down to ones which can be genuinely delivered. Policy HO6 also confirms that there will be a substantial release of green field sites to ensure not only that the required quantum of development are delivered but also that there are sufficient deliverable sites in the early parts of the plan period and that there are a range and choice of sites available at all times Policies HO4 and HO7 make the specific point that the land release strategy will be implemented in a way which ensures that there is a 5 year land supply at all times and that this will require the allocation of some green field sites in the early part of the plan period. .</p> <p>The Council therefore considers that Policy SC5, when read with these other policies offers a balanced and justified approach to meeting the</p>	
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		district's housing needs and the criteria and safeguards contained within them will ensure that delivery can be both maintained and achieved in the most sustainable way possible.	
SC5	3. Amend Criterion 1 to remove specific considerations and replace with 'material considerations'.	It is important to provide the clear aim of the policy. The priority of using PDL includes several caveats which are important and comply with NPPF. While not exhaustive they highlight the key considerations the removal of which would render the policy potentially non compliant.	186
SC5	4 A. More should be done to promote use of brownfield land in context of recent ministerial statements regarding levels of viability.	<p>The Plan seeks to promote the use of PDL as far as it is able given guidance within NPPF. Sites will need to demonstrate that they can be delivered within the Plan period.</p> <p>Section 6 sets out some of the mechanisms that are being used and can be used to support delivery of sites in particular the more challenging PDL sites.</p> <p>Further information is provided in Appendix 6 which sets out the PDL strategy in support of the Core Strategy.</p>	111
SC5	4b. More should be done in the plan to take account of windfalls. This would assist delivery in settlements (such as Ilkley) as well as contribute towards total housing requirement.	<p>The Council monitors both planning permissions and completions (including windfall) on a regular basis and is aware of the number of homes delivered on windfall sites in recent years.</p> <p>Windfall sites are defined in the NPPF as: "Sites which have not been specifically identified as available in the Local Plan process."</p> <p>The last plan which was put in place was the</p>	170

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		<p>RUDP which was prepared during 2001-2, some 13 years ago, and adopted in October 2005. It is therefore not surprising that windfall sites have become the main contributor to supply by number and proportion, as the actually allocated sites have been gradually built out and there has been no new Local Plan to formally identify and allocate recycled land and sites as they become available.</p> <p>This is not the position going forward. The planning system now incorporates a requirement for a much more rigorous analysis of potential land supply in SHLAA's which was not in place when the last RUDP was prepared and the Council is now preparing a new allocations plan based on its SHLAA. The SHLAA and Allocations process will sweep up any current and emerging sites or buildings and if sustainable and deliverable will allocate them. They will not therefore be windfalls.</p> <p>The Council does not therefore think it would be either appropriate or in line with the principle to plan positively to meet the housing needs of the district to include a windfall allowance within the plan period. It considers that bearing in mind past under delivery of housing, the current shortages of homes within the main urban areas and the projected rapid increases in households there is a strong argument that there should be certainty and confidence that an adequate land supply for the plan period is in place. Allocating less and relying on a windfall allowance would reduce that certainty.</p>	
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		<p>The Council would also point out that there has been no change in the National Planning Policy Framework, paragraph 48. The key points to take from this paragraph is that there is no actual requirement to include a windfall allowance, that if a local authority proposes to make such an allowance the evidence to underpin it must be compelling and realistic.</p> <p>The Council's view is that there is no case for an inclusion of a windfall allowance within the first 5 years of the plan period. This is in fact the period when there is most certainty over the nature and spread of sites which are likely to come forward via the information gathered within the SHLAA. As indicated above, since all sites within the SHLAA are candidates for allocation within the Local Plan none of those which are deliverable can be considered to be windfalls. Moreover the site size threshold for inclusion in the SHLAA been reduced to just 0.2ha or 5 dwellings meaning that the range of sites which would be ineligible for inclusion in the local Plan and which would therefore deliver windfalls has been reduced the RUDP has a site size minimum of 0.4ha).</p> <p>The Council's view is that while it is likely that windfall will make an ongoing contribution it is likely, for the reasons set out above, to be at a much lower level than in the recent past. It considers that any contribution made should be viewed as providing a modest level of additional</p>	
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		insurance that the required rates of housing delivery will be met.	
SC5 (A1)	4c. Object to Criterion A.1, Line 2 The text could be interpreted as implying that the reuse of buildings of “high environmental value” is not something which the plan would encourage. As a result, this would mean the Plan would not be encouraging the reuse or adaptation of the District’s Listed Buildings (because they are of “high environmental value”). Clearly, such an approach would not accord with the principles set out in the NPPF.	The reference to high environmental value was included in response to the changes in NPPF. Paragraph 17 sets out the core planning principles one of which encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. It is accepted that the consideration of environmental value related to land and not buildings in the context of NPPF guidance. While not considered unsound a minor amendment could be made to improve clarity.	103
SC5	5 A. Priority of use of PDL will not be delivered by development industry who will favour green field sites	The plan makes clear that land will have to be deliverable to be allocated. Brownfield sites will be taken up if deliverable and viable. Though it is recognised that some PDL is difficult and the Plan recognises this and is focusing interventions on such areas for example canal road and city centre. The plan also identifies a range of supporting mechanisms to support delivery of development in particular section 6.	179
SC5	5b. The ‘brownfield first’ while supported requires a more robust and viable implementation mechanism to ensure its effective delivery.	Section 6 sets out a range of supporting mechanisms which are currently in place and may be used in future to support delivery of development. Further information is provided in Appendix 6 which sets out the PDL strategy in support of the Core Strategy.	394

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SC5	6. Support for provision of local green belt changes.	Noted.	495
SC5	7. Criterion A (3) makes reference to Local Green Belt. Unclear as to what is meant by <i>Local and how this differs or relates to the urban extensions in the fourth priority</i>	Urban extensions are considered to be large enough to deliver at least 1,000 dwellings. The policy prioritises smaller scale changes seen as 'local' where they are sustainable in order to meet the needs in Policy HO3. The Sub area policies provide further indication of the scale and nature of green belt change anticipated based on the current evidence.	108, 396, 397, 400, 402
SC5	8. Include use of safeguarded land under Criterion A (2).	Safeguarded land is not currently green belt either as it was never included or has been removed through a previous development plan. These would be considered under criteria 2 where they are green field.	517
SC5	9. Amend criterion A (3) to make reference to purposes of green belt as a consideration. The release of Green Belt should not be determined by the tests set out in the policy. Any change to green belt should be assessed against the purposes of the Green Belt as a whole and in its specific location.	Policy SC7 sets out the policy on Green belt. It sets out the need for a review and the high level considerations to be considered in that review including specific mention of the purposes. The plan needs to be read as a whole. The addition of the purposes in this policy would add unnecessary duplication.	186, 406, 415
SC5	10. Wording of A (3) should be revised as currently conflicts with other policies in particular those supporting a possible release at Apperley Bridge which is not adjacent with the built up area. A (3) should allow for other green belt changes in sustainable locations.	The detailed scale and nature of any green belt change has not as yet been determined at Apperley Bridge. It is may be that any change may require a change to green belt which is not contiguous with the existing built up area. The policy as written does not rule this out as currently worded.	123, 444
SC5	11. The sequential order allows for the loss of green belt before the allocation of urban	Criterion A (4) relates to urban extensions which require change to green belt. Any smaller urban	406

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	extensions in sustainable locations. Such an approach is not legally compliant.	<p>extensions which may use safeguarded land are treated under criterion A (2).</p> <p>The policy in its intent makes sure that any green belt change is one of last resort under A (3) or A (4) in line with NPPF and exceptional circumstances.</p>	
SC5	12. Fourth priority for urban extensions should be move to priority 2.	<p>Criterion A (4) relates to urban extensions requiring green belt change. As such it is appropriate and in line with exceptional circumstances to have this option distinct and after the use of land outside of the green belt as promoted in A (1) and A (2).</p> <p>This does not preclude the combination of these options in determining in final allocation of sites which may be a combination of the priorities.</p>	179
SC5	13a. The approach to urban extensions needs to be more clearly set out in the Core Strategy including scale and extent. The approach and choices to such opportunities needs to be clearly evidenced	<p>The Core Strategy allows for the consideration of urban extensions under Policy SC5. Only one urban extension is identified as part of the strategy at Holme Wood. This reflects the work already undertaken as part of the Holme Wood and Tony Neighbourhood Plan (pre dates Localism Act). This identified need for long term estate regeneration which included restructuring within the existing built up area but also longer term development subject to change through the Local Plan to the Green Belt boundary. The exact area to be released will be for the Allocations DPD to determine.</p> <p>The Growth Study provides an analysis of all settlements and adjoining green belt in terms of potential opportunities. This looked at a range of constraints and sustainability considerations. This</p>	394

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		<p>informed the broad development strategy of the Core Strategy. Holme Wood urban extension performed well in this high level assessment.</p> <p>Policy SC5 recognises that further urban extensions may be required and may be the most appropriate sustainable solution to meeting unmet needs under exceptional circumstances. The growth study provides the start point for assessing such sites which will be developed further in the Allocations DPD.</p>	
SC5	13b. Object to the need for urban extension especially at Holme Wood	<p>Policy HO2 together with the Council’s Housing background Paper clearly set out the evidence which indicates that there are exceptional circumstances which justify releasing green belt to meet the objectively assessed needs for new homes in the district.</p> <p>The Housing Requirement for the plan period cannot be met in full without the use of land currently designated as Green Belt. Based upon the SHLAA update 2013 there may be a need for up to 11,000 dwellings to be delivered on land formerly Green Belt.</p> <p>Having established that the land supply in non green belt locations is not available to meet the districts needs the Council have then commissioned a District wide growth assessment. This has confirmed both that there are sustainable locations within the green belt for growth and that there are areas where the green belt can be changed without leading to the undermining of the</p>	424

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		<p>role of the green belt either locally or strategically.</p> <p>NPPF paragraph 47 makes clear that Local Plans should meet their objectively assessed housing need in full. Paragraph 82 allows for the review of Green Belt boundaries under exceptional circumstances through the preparation of the Local Plan.</p> <p>Policy HO5 makes clear that the Local Plan seeks to ensure non green belt land is maximised where practicable and appropriate.</p> <p>The proposed Urban extension at Holme Wood is underpinned by the neighbourhood plan. It forms part of a comprehensive regeneration of an existing residential area which required additional development to secure a sustainable long lasting regeneration of the area. Given the settlement hierarchy it is appropriate that the City of Bradford should be a focus for an urban extension where it is deliverable and the purposes of the green belt can be maintained.</p> <p>Growth study concludes that Holme Wood is a relatively sustainable location which performs well against other options tested within the assessment.</p>	
SC5	14. Ranking urban extensions fourth Is not justified and NPPF supports their early consideration and allocation to ensure delivery	The prioritisation reflects the NPPF in that any green belt change in the first instance should be based upon ensuring options within non green belt are fully examined before it is considered.	447

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		<p>Exceptional circumstances are required for green belt change. The nature of the change within each settlement will be informed by the sub area policies and related evidence.</p> <p>There is nothing in the policy that restricts former green belt land if removed through the local plan to later part of the plan period.</p>	
SC5	15. Support for the acknowledgement of meeting localised need by identifying large scale extensions as the lowest priority. It is necessary to meet identified needs in all settlements as opposed to providing one large area in an identified sub area, which would reduce identified needs in another.	Noted.	437
SC5	16. Green belt releases including urban extension may be required in the early part of the plan to ensure an adequate supply of deliverable housing land for the early part of the plan period	<p>There is no policy within the plan which would prevent the release of green belt land if justified in the early part of the plan period.</p> <p>The prioritisation within the policy relates to the overall land supply and does not relate to the potential phasing and release of land. The housing Policies set out the approach to site selection and also phasing and release. This reflects the need to ensure a supply of deliverable land and also ensure an adequate 5 year supply in line with NPPF.</p>	447
SC5	17a. The second to fourth priorities are not properly justified. There may be green field on edge of settlement and or urban extensions which perform better in terms of sustainability than sites in settlement.	Policy SC5 follows the principal of NPPF in terms of green belt change and the need for exceptional circumstance. The plan, through A (1) and A (2), seeks to ensure that non green belt land is in first instance used as far as practicable to meet the future assessed development needs.	447

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		<p>The plan then does allow for green belt release under criterion A (3) and A (4).</p> <p>This is in line with the need for Exceptional circumstances to be demonstrated as set out in NPPF.</p>	
SC5	17b. Unclear how green field sites on edge of settlements will be considered in context of priorities 3 and 4 as there will be Greenfield sites not within settlements which are not green belt.	<p>Green field on edge of settlement but not green belt fall within Criterion A (2).</p> <p>Criterion A(3) and A (4) relate to green belt land only.</p>	396
SC5	18. There is concern regarding the impact of development on Greenfield land within and on edge of settlements. This could have a detrimental impact on local character and loss of important green space. The impact of green belt change is insufficiently evidenced.	<p>Policy SC7 sets out the policy considerations for the review of the green belt. Other policies of the plan will be used to inform detailed choices of suitable development sites. Policy HO7 sets out allocation principles. Other policies provide protection to a range of other environmental assets.</p> <p>The growth study provides a high level review of the potential areas of green belt release. This looks at both constraints but also sustainability considerations.</p> <p>As part of the early work on the Allocations DPD a methodology for green belt review will be produced and consulted upon.</p>	394
SC5	<p>19. Support for Policy in particular:</p> <ul style="list-style-type: none"> - Focus on improved transport and connectivity - Support for use of accessibility criteria as a 	Noted.	190, 431, 507

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	consideration of determine site allocations		
SC5	20a. Access standards under B3 are simplistic and do not reflect the current conditions of communities such as the current deficiencies in particularly public transport and health facilities in settlements.	<p>The Policy seeks to set out a number of high level considerations. Criterion B2 which recognise capacity constraints but also opportunities to make improvements to infrastructure to support development.</p> <p>The accessibility Criteria are a start point for assessing accessibility both current and also identifying where improvements can be made linked to development opportunities.</p> <p>The infrastructure Delivery Plan identifies current position in terms of provision and any deficiencies as well as future provision.</p>	135, 342
SC5	20b. The requirement for sites to meet the accessibility standards in part B is too inflexible and only allows for mitigation which may be out of the control of the developer.	The standards are a start point for assessing and comparing sites. More detailed assessment will be undertaken as part of any site allocations using the relevant policies in Housing section. A methodology for allocating sites will be consulted upon as part of the early work on the Allocations DPD.	396, 397, 400, 402
SC5	21. It is unclear as to the relationship and operation of part A and B in the assessment of sites	See above	396, 397, 400, 402
SC5	22. While the principles in part B are supported, the accessibility considerations has no justification linked to part A and are not exclusive considerations for site selection.	See above	447
SC5	23. Comprehensively revise and replace with appropriate/ adapted site selection policy	The policy does not select sites. It rather sets out the headline considerations for the broad locations of development. The detailed considerations are developed further in the relevant sections of the	447

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		Core Strategy. A methodology for allocating sites will be consulted upon as part of the early work on the Allocations DPD in line with the relevant Core Strategy policies.	
SC5	24. Policy EN2 should also be taken into account when allocating sites to ensure that land with the least environmental value is allocated, as highlighted within the NPPF (paragraph 110).	The Core Strategy needs to be read as whole. Policy HO7 sets out the range of allocation principles.	381
Policy SC6	Green Infrastructure		
SC6 / paragraph 3.97	1a. The wildlife group support reducing density and amending the footprint of development to achieve biodiversity enhancement.	Comments support the contents of paragraph. 3.97 and are noted.	152
SC6 / Figure SS3	1b. Support for the Policy which should help to safeguard the Green Infrastructure of the District. Several elements of Bradford’s Green Infrastructure network are either designated heritage assets in their own right or contribute to the setting of its historic buildings and structures.	Support noted.	103
SC6 / Figure SS3 opportunities to improve green infrastructure linked to key areas of change	2. The policy is unsound as it is not positively prepared as it fails to include the Leeds & Liverpool Canal within section b whilst identifying the river corridors. The Canal is a significant component of green infrastructure within Bradford providing opportunities for sustainable transport, leisure and recreation and biodiversity.	The Leeds and Liverpool Canal was not identified as a strategic green infrastructure asset as these came out of regional and sub-regional/ city region work. However the Leeds Liverpool Canal and key beck corridors are specifically identified in Fig SS3 as district level priorities and opportunities to enhance their positive contribution to GI and particularly to recreation, tourism, transport, heritage, biodiversity and environmental quality.	165
SC6 / Wharfedale sub-area	3. Building on the green space around Addingham contradicts this policy, as the land fulfils the requirements identified for green	The comments are noted. The current policy allows for more detailed assessment identifying potential for improving green infrastructure in	179

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	<p>infrastructure. The quality of the green space in the district is not uniform, green space in the Wharfe Valley is some of the highest quality in the district.</p>	<p>Addingham, as well as providing land to accommodate development. Supporting green infrastructure in Addingham could help to divert pressure for recreation use away from the South Pennine Moors. To highlight this issue at a local level, this could be referenced in the sub-area policy for Wharfedale B second bullet point: Addingham will see the creation of 200 new homes to meet local needs, associated community facilities and green infrastructure.</p>	
<p>SC6 & AD1 Airedale sub-area – Environment 4 & 5.</p>	<p>4. The Group supports the policy overall but questions the strength behind its application. They support Airedale sub-area – Environment 4 & 5. They support the rights of way network as an important resource and consider that work on identifying the strategic GI network needs to reflect this. They wish to see more support for the definition of local opportunities for green infrastructure in the Keighley and Worth Valley context, particularly for the Airedale Greenway and for green/ blue infrastructure along the River Worth and North Beck Valleys and the network of paths in the vicinity, linked to promoting opportunities for promoting improved flood storage and biodiversity enhancement.</p>	<p>Support is noted.</p> <p>The importance of the Rights Of Way network is reflected in paragraph 3.98 and in criteria SC6 C6.</p> <p>The issues raised have been specifically identified in AD1 D – Environment 3 and 4. The River Worth and North Beck Valleys have not been specifically mentioned by name, but could be though the change is not required to make the plan sound.</p>	<p>371</p>
<p>SC6</p>	<p>5. This policy is strongly supported but it should require that all sites which are to be considered in the allocation process should be appraised against these criteria. That means not just the sites preferred but all sites that have been identified. This requirement should be enshrined in the policy.</p>	<p>Support noted. The policy sets out the high level strategic policy for the Local Plan on this matter. It would not be appropriate for the policy to set out detailed site selection criteria. The principles for housing site selection are set out in Policy HO7. Criterion F (4) explicitly recognises the importance of Green Infrastructure in line with Policy</p>	<p>152</p>

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		SC6. However, The detailed considerations will be developed further in the allocating development plan documents. A methodology for allocating sites will be consulted upon as part of the early work on the Allocations DPD in line with the relevant Core Strategy policies.	
SC6	6. The policy content of SC6 and the explanatory text are fully supported and the District –wide opportunities for enhancing the amount, quality and connectivity of green infrastructure via development proposals are fully recognised. This approach will be realised via positive and proactive planning. It should however be recognised that the delivery of green infrastructure and other social, environmental and economic improvements via individual developments to realise their full sustainability potential needs comprehensive growth orientated planning.	The point noted in the last sentence has been recognised at the start of paragraph 3.97.	447
SC6	7. The policy is supported and the commitment to further work on green infrastructure to inform other local plan documents is noted. It is considered that this should include the mapping of Green Infrastructure to give further guidance on priority areas for enhancements in line with the NPPF.	Support for policy and need for further work is noted.	481
SC6	8. Natural England broadly support the policy but consider that it needs to be aligned more closely with the findings of the HRA. They have identified potential for a number of minor amendments in this respect. The HRA has identified new or improved	In relation to amendments proposed add to B in SC6: 'Reflecting the findings of Habitats Regulations Assessment work, mitigating the adverse effects of increased recreation upon the South Pennine Moors SPA/SAC is a priority.'	513

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	<p>natural green space as a mitigation measure to address increased recreational disturbance/trampling on the South Pennine Moors Natura 2000 site. They advise adding to the policy: ‘Mitigating the adverse effects of increased recreation upon the South Pennine Moors SPA/SAC.’ This could then be explained further within the supporting text.</p> <p>Natural England also advise that, in accordance with NPPF paragraph 114 the Core Strategy should set out a strategic approach for the creation, protection, enhancement and management of networks of biodiversity as well as green infrastructure. Policy SC6 should explicitly refer to biodiversity as well as green infrastructure. Habitats should include hedgerows, in-bye land, river corridors, and upland oak woodland.</p>	<p>As drafted the policy is not considered unsound. However for clarity a minor change could be made to ensure clarity in supporting text at the end of 3.93:</p> <p>‘The link to policy SC8 Protecting the South Pennine Moors and their zone of influence is a particularly important one. Providing high quality areas of natural greenspace on a suitable scale, based on information gathered in visitor survey work, will assist in mitigating the adverse effects of increased recreation on the South Pennine Moors.’</p> <p>The thread of biodiversity networks is included in SC6 C. Specific habitat networks have been referenced in the biodiversity policy EN2</p>	
SC6	<p>This policy is strongly supported but it should require that all sites which are to be considered in the allocation process should be appraised against these criteria. That means not just the sites preferred but all sites that have been identified. This requirement should be enshrined in the policy.</p>	<p>Policy SC6 aims to assess land which already contributes towards, or has the potential to contribute towards the criteria identified in C.</p> <p>Sites will be subject to further more detailed considerations when being considered for development in the Allocations DPD. The site selection methodology in line with the Core Strategy Policies will be consulted upon at early stage of allocations process.</p>	406
SC6	<p>9. The plan conflicts with NPPF paragraph 111 regarding the effective use of Brownfield land</p>	<p>Locations for development that offer opportunities to deliver green infrastructure could be either brownfield or Greenfield, as indicated in the opportunities identified in Fig SS 3.</p>	142, 144, 145, 333, 336, 367, 370

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SC6	10. Although the Habitats Regulations has reduced the number of homes for Ilkley, there has been no allowance made for the many green routes through the town to the River Wharfe i.e., Ben Rhydding Drive, Ben Rhydding Road, Backstone Beck, Heber's Ghyll and Abbeyfield links to the Moor. There is no understanding of this relative to the environment. Valuable grass land for farming will be lost when more food is needed.	An indication of green infrastructure issues for Wharfedale has been set out in WD1 D Environment and river and beck corridors have been specifically identified as green infrastructure priorities. It is recognised that more detailed assessment of green infrastructure will need to take place linked to the preparation of the Allocations DPD and the SPD relating to SC8 and the South Pennine Moors zone of influence. This will need to take place in the context of the NPPF which indicates that in meeting development needs the aim should be to minimise adverse effects on the local and natural environment and to allocate land with the least environmental and amenity value, where consistent with other policies in the framework, including considerations relating to agricultural land.	92
SC6	11. Policy SC6 includes reference to the River Wharfe as a strategic infrastructure asset. The Wharfe runs alongside the village and is a very important part of its character as well as having major wildlife, habitat and leisure functions. The green corridor of the river and its associated environments should be better defined and protected. The Plan should have set out policies and proposals for this key corridor, rather than relying on future work.	Taken together policies SC6 (green infrastructure), EN7 (flood risk) and WD1 D (Environment), particularly WD1 D 3 indicate strategic priorities in relation to the Wharfe Corridor. Issues relating to design and character are also addressed in EN4 (Landscape) and in the design section of the document. It is recognised that more detailed assessment of green infrastructure will need to take place linked to the preparation of the Allocations DPD and the SPD relating to SC8 and the South Pennine Moors zone of influence.	111
SC6 (C) / Paragraph 3.100	12. Support for this statement, however this must be adhered to in order to protect greenfield sites and the Green Belt	Support noted.	507
SC6 / Paragraph 3.91	13. Support for paragraph 3.91 which recognises the linkages between the District's	Support noted.	103

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	heritage assets and its Green Infrastructure network. Several elements of Bradford’s Green Infrastructure network are either designated heritage assets in their own right or contribute to the		
Policy SC7	Green Belt		
SC7	1. Green Belt should be protected	Noted	70, 71, 79, 86, 101, 192, 194, 361, 409, 516
SC7	2a. Support for general approach of policy	Noted	123, 160
SC7	2b. Support for part A of policy	Noted	507
SC7	3a . No exceptional circumstances to change green belt and no emphasis to minimise use of green belt	<p>Policy HO2 together with the Council’s Housing background Paper clearly set out the evidence which indicates that there are exceptional circumstances which justify releasing green belt to meet the objectively assessed needs for new homes in the district.</p> <p>The Housing Requirement for the plan period cannot be met in full without the use of land currently designated as Green Belt. Based upon the SHLAA update 2013 there may be a need for up to 11,000 dwellings to be delivered on land formerly Green Belt.</p> <p>Having established that the land supply in non green belt locations is not available to meet the districts needs the Council have then commissioned a District wide growth assessment. This has confirmed both that there are sustainable locations within the green belt for growth and that there are areas where the green belt can be</p>	70,71, 79,101, 130, 157, 170, 192, 194, 361, 404, 409, 483, 507

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		<p>changed without leading to the undermining of the role of the green belt either locally or strategically.</p> <p>NPPF paragraph 47 makes clear that Local Plans should meet their objectively assessed housing need in full. Paragraph 82 allows for the review of Green Belt boundaries under exceptional circumstances through the preparation of the Local Plan.</p> <p>Policy HO5 makes clear that the Local Plan seeks to ensure non green belt land is maximised where practicable and appropriate.</p>	
SC7	5. Green belt should not be developed, except in exceptional circumstances	See response 4 above.	25, 27, 38, 39, 41, 46, 59, 73, 88, 104, 107, 115, 122, 131, 142, 144, 147, 151, 155, 158, 180, 183, 204, 214, 299, 355, 341, 359, 365, 341, 344, 348, 352, 360, 361, 368, 372, 382, 384, 403, 425, 427, 453, 454, 471, 473, 474, 480, 500, 501, 505
SC7	6. The Greenbelt surrounding Ilkley should not be released as it is contrary to the NPPF paragraphs 80, 81 & 82 (purposes of Green	The Council has established via its analysis of the deliverable land supply that there is a District wide need and exceptional circumstances to release	2, 7, 8, 17, 19, 20, 21, 22, 24, 27, 30, 31, 67,72,

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	Belt and lack of exceptional circumstances)	green belt land. See response 4 above. Policy SC7 does not refer to specific settlements however it should be noted that based on the analysis of the SHLAA the Council considers that it is apparent that in most of the settlements green belt release will be required if the Districts needs are to be met in full. The sub area policies set out an indication of the implications of green belt for each settlement in context of evidence and the relevant housing requirement for the settlement as set in HO3.	73, 74, 87, 104, 107, 110, 118, 120, 138, 139, 141, 142, 144, 145, 146, 148, 171, 177, 180, 183, 184, 198, 199, 211, 217, 229, 232, 236, 250, 265, 273, 307, 333, 334, 336, 361, 363, 367, 368, 369, 370, 375, 378, 381, 382, 391, 392, 398, 403, 418, 426, 452, 453, 459, 460, 465, 469, 470, 504, 516, 518
SC7	7. There should be no Green Belt releases.	See response 4 above.	50, 51, 52, 91, 97, 133, 137, 150, 155, 218, 221, 230, 251, 265, 268, 269, 275, 282, 292, 296, 311, 314, 318, 325, 326, 331, 337, 355, 408, 474, 492
SC7	8a. The release of any green belt land should only be used for the construction of affordable housing / first time buyer properties.	See response 4 above. It would not be appropriate to limit green belt change to affordable housing given the exceptional circumstances and ensuring	492

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		an appropriate mix of housing.	
SC7	8b. Land release should be limited in size to make housing varied and the design more organic.	See response 4 above. The exceptional circumstances relate to significant needs which can only be accommodated by green belt change. The scale of green belt change in some locations may be of a smaller scale depending on local housing target in policy HO3 and land supply picture.	337
SC7	8c. The requirement of 55% Green Belt means that the Core Strategy cannot be sound.	See response 4 above. The Core Strategy does not set out either a District wide target for green belt change or a target for individual settlements. An indication is given in the sub area policies based on current evidence. The final scale of green belt change District wide and by settlement will be determined in the Allocations DPD.	88, 304, 327, 341, 443, 449, 450, 453, 501
SC7	8d The Green Belt apportionment for Ilkley should be 25% in line with the rest of the district.	See response 8C above. There are varying circumstances and it is not appropriate to apply a single percentage irrespective of the very differing circumstances and land supply picture in each settlement.	158, 184
SC7	8e.. The apportionment of greenbelt around Ilkley proposed to be used for development is higher than anywhere else in the District.	See response to 8C.	10, 15, 16, 18, 41, 46, 67, 72, 74, 93, 104, 115, 131, 133, 363, 375, 403, 453
SC7	9. Without an allocations DPD, it is difficult / impossible to assess whether the proposed Green Belt releases in Wharfedale will be in sustainable locations and compliant with the NPPF.	In Wharfedale the sub area policies indicate where green belt change may be required to meet the proposed housing targets under policy HO3. The Council points out that in Addingham and Menston no green belt releases are currently envisaged. The SHLAA and the Bradford Growth Assessment	74

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		give sufficient evidence to be confident that in fact there are sustainable locations in the remaining Wharfedale settlements for green belt releases.	
SC7	10. The apportionment of greenbelt around Ilkley proposed to be used for development is higher than anywhere else in the District	See response to 8C. There is no apportionment set out in the policies in the plan. The nature and extent in each settlement of change will be determined in Allocations DPD.	10, 15, 16, 18, 41, 46, 67, 72, 74, 93, 104, 115, 131, 133, 363, 375, 403, 453
SC7	11a. General support for the policy recognition of the need for release of green belt to meet development needs.	Noted.	444, 495, 517
SC7	11b. Support necessary green belt releases in Wharfedale	Noted.	447
SC7	11c. Support local green belt changes in Burley-in-Wharfedale	Noted	495
SC7	12. Support that there are no Green Belt releases planned for Addingham.	Noted	50, 51, 52, 111
SC7	13. Document does not mention 5 purposes of including land in green belt	The Policy makes reference to the 5 purposes in NPPF but does not repeat them. The policies of the Local Plan should not unnecessarily repeat national policy.	86, 101, 130
SC7	14a. Support for selective review of green belt.	Noted.	186,415
SC7	14b. Plan should undertake a full review rather than a selective or piecemeal review. This reflects the anticipated scale of green belt release required to meet need and also the approach adopted in other Local Plans including Leeds Core Strategy	The Local Plan will be undertaking a review of the green belt in order to meet its objectively assessed housing need in full as well as identify new land for economic development in key locations. See response 3A above in relation to exceptional circumstances. The review will be 'selective' in the sense that it will only be undertaken in terms of the identified exceptional circumstances in order to identify land to meet the unmet needs with regards to the	105, 123, 129, 170, 185,342, 396, 397, 400, 402, 406, 423, 437,444, 447, 512

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		development strategy set out within the plan as whole. Land supply indicates change required in most settlement but not all settlements.	
SC7	14c. Any full green belt review should be undertaken in conjunction with other adjoining LPAs	The Green belt review will be undertaken as part of the Allocations DPD. A green belt review methodology will be the start point for this. Adjoining LPAs will be engaged throughout this process both as statutory consultee but also under the Duty to Cooperate. Given the different stages that respective Local plans are at it is not currently proposed that a collaborative review of the Green belt will be undertaken. A strategic review of the green belt in the city region is something that may be considered in future local plans.	105
SC7	15a. A review methodology needs to be devised which maintains the position and relative importance of the settlements in the hierarchy. This full review will form a key part of the work in preparing the Sites and Policies DPD.	The Green belt review will be undertaken as part of the Allocations DPD. A green belt review methodology which will be subject to consultation will be the start point for this.	447
SC7	15b. Unclear on how the green belt review will be undertaken to meet housing requirement and distribution in Ho1 and Ho3. The plan should set out a clear framework for undertaking the review linked to the settlement hierarchy.	The Strategic Core Policies set out the high level policy considerations. Policy HO3 provides the headline distribution based on the Settlement Hierarchy in policy SC4. The sub area policies provide an indication based upon the local evidence on how the housing need can be met and likely need for green belt change in relevant settlements.	157, 186, 415

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		<p>See response above on green belt methodology.</p> <p>The Green belt review will be undertaken as part of the Allocations DPD. A green belt review methodology which will be subject to consultation will be the start point for this</p> <p>There will be a separate site selection methodology for identifying development sites. This will be consulted upon as part of the Allocations DPD.</p>	
SC7	16a. Concern at the delay of actual green belt change in subsequent DPDs. The Core Strategy should provide a clearer indication of broad areas of green belt change	<p>The Council is committed to progressing the Allocations DPD in line with the updated LDS. The Core Strategy provides a clear framework for the green belt review which will be refined through the allocations DPD.</p> <p>The sub area policies provide an initial indication of the likely need for green belt change in each settlement based on the current evidence.</p>	423
SC7	16b. Green belt change should be made through the Core Strategy and not left until the allocations DPD.	<p>See response above under 16A. The Council has reviewed its local plan programme in the revised Local Development Scheme approved in July 2014. This reaffirms the local plan will be made up of a number of Development Plan Documents with the strategic policy set out in the Core Strategy. The Allocations DPD will deal with both allocations and Green Belt change.</p> <p>The NPPF paragraph 153 allows for the preparation of a set of documents where justified. The LDS sets out the basis for the choice of DPDs.</p>	394, 494
SC7	17. Green belt review should also consider the requirements of new development in terms of	Not a relevant consideration for Green Belt in its own right.	123

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	water and waste water infrastructure.	The Local Infrastructure Plan considers the water and waste infrastructure needs of the Local Plan. .	
SC7	18. Support the need for the green belt as revised to ensure its longevity beyond the plan period (paragraph 3.102)	Noted.	108
SC7	19A. The Plan needs to ensure that the green belt will last well beyond the plan period and in so doing the Core strategy should identify the need to designate Safeguarded land. Various suggestions as to how long from 5 to 15 years	NPPF paragraph 83 states that when defining or reviewing green belt boundaries LPAs need to have regard to the intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Paragraph 85 sets out the detailed considerations when defining green belt boundaries. This states that where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period; There is no absolute requirement to automatically allow for safeguarded land under paragraph 85. In this context each plan must tailor their approach to the circumstances at the time Unlike the RUDP the Core Strategy has determined to release land for a full 15 year period rather than a more limited 10 year release with additional safeguarded land. Land supply is sufficient to meet the plan requirement in full without the reliance on other	103, 129, 396, 397, 400, 402, 406, 447, 495, 512

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		<p>sources such as windfalls. This will make contribution albeit at lower scale than previously within the plan period and allow the allocated supply to last beyond the plan period.</p> <p>The plan is already proposing green belt change of a significant scale. Approximately land for 11,000 dwellings based on the current evidence. To go beyond this which would be required by the allocation of Safeguarded land would not be appropriate at this stage in terms of scale of change in advance of wider strategic review of green belt across the Leeds City Region.</p> <p>There is also a constrained land supply based on current evidence and also uncertainties as what any future need may be beyond 2030.</p>	
SC7	19b. The plan does not sufficiently establish a long term green belt boundary. Further green belt change would be required which would be damaging in particular to the countryside and impact on the character and functions of settlements.	See response 19a above.	394
SC7	20. The limits to capacity of land within green belt should warrant a reduction in the Housing requirement	<p>NPPF paragraph 47 is clear that the Local Plan should meet its requirement in full. The Core Strategy seeks to meet this and based on the evidence this can be done, though it is recognised that the local circumstances do pose significant challenges in terms of land supply and constraints. At present the Council do not require any other adjoining LPA to take any of its unmet need.</p> <p>The evidence in the SHLAA and Growth Study</p>	394

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		indicate that while tight there is sufficient green belt land to meet the requirement for the plan period	
SC7	21. Green belt releases should not be restricted to meeting long terms needs as suggested but meet needs throughout plan period.	The Green belt releases will be made to meet the needs within the plan period. The actual phasing of sites within the plan period will be subject to considerations under policy HO4. Nothing stopping former Green Belt sites comes forward in the early part of plan period.	129
SC7	22. Policy needs to be used to actively support regeneration and recycling of brown field sites	The core approach under policy CS5 is to support the use of non green belt and green field sites. However the plan recognises that the needs cannot be met without release of some green belt. It is also required to ensure sites are deliverable and that the plan itself has a supply of 5 year deliverable sites.	157
SC7	23. Policy should give stronger protection against coalescence of settlements and impact on neighbouring LPAS.	The policy makes clear the need to consider the purposes of green belt and also the Strategic role of green belt within the City region. The detailed review will be subject to a detailed methodology and will be undertaken engaging and consulting neighbouring LPAs as part of the Allocations DPD. The Growth study suggests there is sufficient land which could be used which would not harm the key purposes of green belt in particular which would not lead to coalescence of settlements. In terms of the named urban extension at Holme Wood the scale of development and required green	185

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		belt release would in no way lead to coalescence with any other settlement.	
SC7	24. Any Green Belt review should focus on cementing the long-term function of the Green Belt, both in defining settlement form and providing a defensible resource for green infrastructure - not just enabling release of land for development.	The green belt review will be based primarily on the purposes of green belt set out in NPPF and guidance in paragraph 85. The Green belt review will be undertaken as part of the Allocations DPD. A green belt review methodology will be the start point for this and will be subject to detailed consultation.	394
SC7	25. The review should consider the local impacts of releases particularly where these may lead to the potential for subsequent releases that cumulatively would undermine the strategic purpose of the Green Belt.	See response 24 above.	406
SC7	26. Redrawing the greenbelt boundary to enable development at Menston & Holme Wood would encroach into the strategic gap between Leeds and Bradford leading to the emerging of the two cities.	<p>The Policy sets out the detailed considerations for any revised boundary. Criterion B specifically seeks to ensure that any green belt change does not undermine the strategic function of green belt. It also makes clear any change will have regard to the purposes of green belt in national guidance including the need to prevent coalescence.</p> <p>The urban extension at Holme Wood can be delivered at a scale which would in no way lead to coalescence of settlements.</p> <p>The proposed housing target under Policy HO3 for Menston can be met with no green belt change.</p> <p>The detailed methodology for any green belt review will be consulted upon as part of the Allocations DPD.</p>	376

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Policy SC8	Protecting the South Pennine Moors and their Zone of Influence		
SC8	1. Support for the principle of zones to protect the South Pennine Moors SPA/SAC. Support for a precautionary approach when considering locations for new development that are close to the site and for new housing avoiding both direct and indirect impacts on supporting habitats.	Support for the overall approach is noted.	111, 152, 34. 50, 52, 111, 344, 358, 466, 501
SC8	1a. The implications and outputs of the HRA and associated survey work in relation to Wharfedale and Addingham, in particular are supported. It is noted that Wharfedale settlements are closer to the South Pennine Moors SPA and development on Greenfield sites in these settlements will have proportionately greater (adverse) impacts than development in the urban areas.	Support for the overall approach is noted.	111
SC8	1b. It is noted that Addingham lies in close proximity to both the South Pennines SPA/SAC and the North Pennines SPA/SAC and that the whole of Addingham lies within the 2.5km supporting habitat mitigation zone of both protected areas.	Support for the habitat mitigation zone of influence in relation to the South Pennine Moors is noted. In relation to the South Pennine Moors the zone of influence policy is needed due to their relative proximity to locations for future development and high levels of accessibility. The supporting habitat mitigation zone does not apply to areas outside the district boundary; however the Report does indicate that areas between the north and south Pennine moors are important.	111
SC8	1c. It is noted that the 2.5km South Pennine Moors zone of influence covers north Bingley and Eldwick/ Gilstead. HRA survey work is supported and concern is expressed about the impact on curlews and grassland habitats important to them of identifying housing in this	Support for the survey work outputs and the zone of influence is noted. The updated HRA Report provides more clarity about the impact pathways in the HRA that have exercised an influence over settlement housing targets. Assessment of the bird and habitat survey work outputs of 2013, in relation	152

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	<p>area. Concern expressed about taking land out of the greenbelt at Eldwick, Baildon and Ilkley and that areas at High Eldwick, Gilstead, the edge of Baildon Moor and the edge of Shipley Glen will be affected by even small developments.</p>	<p>to potential impacts on curlews and grassland habitats, allows the Council to have sufficient confidence that land to meet the level of development identified can be accommodated in these areas. While the HRA work that has taken place to date is considered to be sufficiently robust in relation to the level of risk and strategic decision making involved in a core strategy, it indicates that more detailed work will take place to inform work on the Allocations DPD.</p>	
SC8	<p>1d. Support for section 6.5 (identifying strategic avoidance measures) in HRA report and robust approach to mitigating impacts. They would wish to see an additional reference to emphasise the need for monitoring in paragraph 6.5.1 of HRA. NB Also applies to HO3.</p>	<p>Support for the strategic avoidance measures is noted. There is a reference to monitoring in 6.4.2.</p>	34
SC8	<p>1e. Support for zone A restricting development within 400m of the SPA as being pragmatic and reasonable, with information provided about bird species and habitats.</p>	<p>Support for zone A is noted.</p>	34
SC8	<p>1f. Support for zone Bi as safeguarding supporting habitats within 2.5km of the SPA. Loss of feeding areas could have an important impact on breeding bird populations. Further information is provided about the characteristics of important habitats and the behaviour of golden plover.</p>	<p>Support for zone Bi is noted.</p>	34
SC8	<p>1g. Support for Zone Bii and recognition that this is based on visitor survey data and distances travelled to reach the site. Consideration also needs to be given in this</p>	<p>Support for zone Bii is noted.</p>	34

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	zone to identifying important habitats here that are used by golden plovers, as research indicates that there are also likely to be important fields in this area. A zone of 400m around golden plover fielding fields should be sufficient to ascertain that there will be no adverse impact on the integrity of the SPA within this zone.		
SC8	1h. 'Given the proximity of settlements to the South Pennine Moors SPA/SAC and the distribution of development proposed, Natural England concurs that adverse effects upon the Natura 2000 site as a result of urban edge effects cannot be ruled out.' 'Policy SC8 seeks to avoid such effects by restricting developments within 400m.' Natural England – March 2014.	Support for this policy element is noted.	513
SC8	1i. Provided the measures identified in policy SC8 are effectively implemented at the allocations and/or projects stage, these should avoid and/or mitigate the effects of policy HO3.	Support for the approach is noted.	513 (Natural England updated advice Dec 2014)
SC8	2. Support for SC8 in principle but potential for minor amendments		
SC8	2a. Natural England support the policy in principle and state: Policy SC8 is required to avoid adverse effects upon the South Pennine Moors SPA and SAC. The zones and avoidance /mitigation measures have been identified through the HRA process and their inclusion within the plan is required to ensure the strategy complies with the EU Habitats Directives and national regulations. However Natural England believe this policy	Support for policy SC8 being required to avoid adverse effects upon the South Pennine Moors SPA and SAC and for its inclusion within the plan to ensure that the strategy complies with the EU Habitats Directives and national regulations is noted. Support for the zones and avoidance/ mitigation measures having been identified through the HRA process is also noted It is considered that the simplification that is being put forward could create confusion in relation to	513 & Natural England updated advice

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	<p>could be simplified. Instead of separating the policy between Zones A, Bi, Bii, and Bi and Bii, it could simply set out a policy for Zone A (up to 400m), Zone B (400 - 2.5km) and Zone C (or Bi) (400-7km). (March 2014)</p> <p>Natural England have added in their updated advice: provided the measures identified in policy SC8 are effectively implemented at the allocations and/or projects stage, these should avoid and/or mitigate the effects of policy HO3.</p>	<p>overlapping zones by indicating that within a zone extending from 400m-7km appropriate mitigation measures should allow development to take place.</p>	
SC8	<p>2b. SC8 attempts to minimise adverse impacts of development but fails test of soundness because impacts can be predicted with reasonably high confidence, but mitigation and compensation cannot necessarily be delivered. Measures are not in place to compensate for impacts that are occurring at present and are expected to increase in future due to growth. Mechanisms are described, but there is no time scale, no certainty of adequate funding and no redress if measures are not successful. There is a risk that the SAC and SPA sites may not return to favourable condition. Unless green infrastructure and specific greenspace proposals are developed in advance, it is unlikely that adequate provision can be made to mitigate impacts.</p>	<p>Refinement of the approach to delivery of management and mitigation measures and further monitoring is an ongoing project. The conclusions to the updated HRA Report state: ‘To ensure that delivery and funding mechanisms for avoidance and mitigation measures are taken forward, the Council will produce a Supplementary Planning Document to guide implementation of the South Pennine Moors Zones of Influence Policy set out in SC8.’ This will provide the vehicle and focus for refining the approach to avoidance, management and mitigation. It is accepted that funding needs to be put in place and that there are risks in relation to the site returning to favourable condition.</p>	497
SC8	<p>3. Objections to SC8. The HRA evidence base has legal and scientific flaws. SC8 is too precautionary and restrictive and not in accordance with the NPPF.</p>		495, 423, 447
SC8	<p>3a. Policy SC8 is unduly restrictive and it is</p>	<p>SC8 is a strategic core policy which takes a zones</p>	495, 423, 447

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	unlikely that the nature and scale of restrictions imposed are required to allow the requirements of regulation 102 to be met.	of influence approach, based on evidence, to setting out necessary avoidance and mitigations measures. The overall objective of appropriate assessment is to ascertain whether any part of the plan will lead to an adverse effect on the ecological integrity of nearby European sites and, if so, make recommendations on how such effects can be avoided or mitigated. SC8 developed through the assessment process, to allow effects to be avoided and mitigated, it responds to the risks associated with the strategic level of decision-making. The overall approach will allow development to take place but provides confidence that adverse impacts on the ecological integrity of the South Pennine Moors can be avoided.	
SC8	3b. There is a need to re-examine the evidence which underpins the policy (SC8) and seek to amend the approach as outlined in Appendix A. The appendix A document indicates that consideration should be given to the adoption of a policy which secures protection of the European sites through identifying further information and data that is needed to make a reliable assessment of impacts of housing numbers/ distribution on the European Sites and to require that information and data to be obtained and to dictate the approach in the Allocations DPD.	SC8 is a strategic core policy which takes a zones of influence approach, based on evidence presented in the HRA Report to setting out necessary avoidance and mitigations measures which will allow development to take place but avoid adverse impacts on the ecological integrity of European Sites. It is unlikely that a policy on the lines identified in Appendix A would allow the necessary degree of certainty to be able to conclude that the core strategy would not result in adverse impacts on the ecological integrity of European Sites.	495, 423, 447
SC8	3c. As the Appropriate Assessment of 2014 is flawed from a legal/ procedural point of view and scientifically, then policy SC8 is unjustified. Policy SC8 lacks justification or explanation and is flawed in relation to the application of	It is considered that those issues raised in comments, that might have led to the perception that there were legal and/ or scientific flaws in relation to the previous HRA report, have now been addressed. SC8 is a strategic core policy which	423, 495

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	evidence.	takes a zones of influence approach, based on evidence presented in the HRA Report to setting out necessary avoidance and mitigations measures which will allow development to take place but avoid adverse impacts on the ecological integrity of European Sites. The overall contents of the HRA Report justify the approach taken in SC8, although Section 6 relating to avoiding and/ or mitigating impacts is particularly relevant.	
SC8	3d. The HRA Report needs to include an assessment of the avoidance/ mitigation measures set out in SC8, which must be demonstrated to be necessary, proportionate and effective to address the likely evidenced impacts.	SC8 is a strategic core policy which takes a zones of influence approach, based on evidence presented in the HRA Report to setting out necessary avoidance and mitigations measures which will allow development to take place but avoid adverse impacts on the ecological integrity of European Sites. The overall contents of the HRA Report justify the approach taken in SC8, although Section 6 relating to avoiding and/ or mitigating impacts is particularly relevant. The measures identified are linked to particular impact pathways and the evidence presented in relation to these. They are also linked to the conservation objectives for the European Sites. The measures are needed to safeguard supporting habitats as loss of feeding areas could have an important impact on populations for which the SPA has been classified.	495
SC8	3e. It is agreed that there is a requirement to ensure key areas of wildlife are given the necessary protection but it is considered that the methodology which relates to the 2.5km buffer zone is fundamentally flawed in its approach.	The overall contents of the HRA Report justify the approach taken in SC8 and provide evidence to support the Bi element (that applies to the zone between 400m and 2.5km of the designated site). The 2.5km zone is an essential element in establishing a spatial approach to avoiding and mitigating impacts. It is needed to safeguard	423, 447

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		supporting habitats as loss of feeding areas could have an important impact on populations for which the SPA has been classified.	
SC8	3f. Within zone Bi there is a direct approach aimed at limiting the amount and extent of any development within the 400m to 2.5km zone where there would be an impact on the carrying capacity of identified bird populations and/or on sites that are used for foraging by these bird species or are important to the integrity of the designated site. This is stated to be a precautionary approach and it would apply to a very wide area of certain Wharfedale and Airedale settlements.	SC8 is a strategic core policy which takes a zones of influence approach, based on evidence presented in the HRA Report to setting out necessary avoidance and mitigations measures which will allow development to take place but avoid adverse impacts on the ecological integrity of the European Site. The 2.5km zone is an essential element in establishing a spatial approach to avoiding and mitigating impacts. It is needed to safeguard supporting habitats as loss of feeding areas could have an important impact on populations for which the SPA has been classified. The HRA emphasises that within the 2.5km zone sites identified for development need to avoid direct (e.g. land take) or indirect (e.g. increased disturbance) impacts on important supporting habitats. The reason the zone applies to significant areas of Airedale and Wharfedale is due to the location of Rombalds Moor which forms an 'island' area of upland heath.	447
SC8	3g. The proposed policy and its zonal criteria do not form a clear full criteria based policy against which proposals for development can be assessed. The policy is negative and precautionary and lacks the balance of positive criteria. A much clearer, more specific and better balanced set of policy criteria are required in a totally revised policy SC8 which will enable a fair assessment of development proposals to proceed in a balanced way. At	The role of SC8 is that of a strategic core policy, which therefore relates to the level of risk and strategic decision-making involved in a core strategy. It takes a zones of influence approach, based on evidence presented in the HRA Report, to setting out necessary avoidance and mitigations measures which will allow development to take place but avoid adverse impacts on the ecological integrity of the European Site. Guidance will be provided on more detailed criteria in the Allocations	447

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	various points in the explanatory text the Council appear to implicitly accept the considerable shortcomings of this policy approach, as drafted, by suggesting that further work and assessment is necessary.	DPD and in an SPD. In accordance with the HRA hierarchy of intervention, measures are identified which seek to avoid effects and allow management and mitigation to take place. The HRA emphasises that within the 2.5km zone sites identified for development need to avoid direct (e.g. land take) or indirect (e.g increased disturbance) impacts on important supporting habitats. Reflecting the zones importance as being functionally linked to the SPA, the policy seeks to ensure that the least sensitive areas of land are identified for future development. SC8 is fully in accordance with the NPPF, allowing objectively assessed need to be met in a manner which reflects EU obligations and statutory requirements. It is a single policy within the context of a wider plan.	
SC8	3h. In the widest zone, Bii, which extends from 2.5 km and up to 7kms from the SPA/SAC boundary there is an assumption, without justification, that there are still likely to be significant adverse effects resulting from development.	The zone Bii and the extent of the zone are justified in relation to the evidence presented in the HRA Report relating to recreational impacts and visitor activity presented in section 5.7 of the HRA Report and associated maps and data gathered from visitor surveys of the South Pennine Moors SPA/SAC within Bradford District. The extent of the area relates to the analysis of visitor numbers and distribution of distance travelled to the South Pennine Moors in summer 2013.	447
SC8	3i. SC8 does not meet the soundness test in the NPPF, particularly in relation to being the most appropriate strategy when considered against alternatives and not being positively prepared. The core strategy needs to adopt the most appropriate strategy when considered against the reasonable alternatives to enable	Appropriate assessment influenced the core strategy at a stage in plan-making when evidence was still being gathered and options were being assessed which, in accordance with the HRA hierarchy of intervention, allowed changes to be identified which sought to avoid effects and allow management and mitigation to take place. It was	423, 495

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	<p>the plan to deliver sustainable development in accordance with national planning policy.</p>	<p>therefore part of the process of assessing reasonable alternatives. SC8 seeks to achieve sustainable development by taking a zones of influence approach, based on evidence in the HRA, to setting out necessary avoidance and mitigations measures which will allow development to take place but avoid adverse impacts on the ecological integrity of European Sites. It is positively prepared in that it allows objectively assessed need to be met in a manner that supports the objectives of European Sites and therefore achieves sustainable development. It is fully consistent with the policies in the NPPF as it reflects and promotes EU obligations and statutory requirements. It supports the distinctions to be made between the hierarchy of international, national and locally designated sites so that protection and weight is commensurate with status and the need to move from a net loss of biodiversity to achieving net gains for nature. It supports the aim of allocating land with the least environmental or amenity value.</p>	
SC8	<p>3j. The policy at paragraph 167 (of the NPPF) states that environmental assessments should be started early in the plan making process and that key stakeholders should be consulted in identifying the issues that an assessment is to cover. The Habitat Regulations Appropriate Assessment was not introduced until the most recent stages of the preparation of the Core Strategy and the development industry, as a key stakeholder were not consulted on the</p>	<p>The early stages of environmental assessment of the core strategy took place through the sustainability appraisal process, which was made available for consultation at each key stage in the plan-making process. This flagged up at an early stage the issue of proximity to the European Site in relation to settlements in Airedale and Wharfedale and, in relation to the FED document, the need for screening in relation to HRA. An HRA is a more detailed form of assessment and could not</p>	447

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	scoping of this assessment.	therefore take place until core strategy proposals had been developed more fully at the FED stage.	
SC8	3k. It is important to acknowledge, when assessing the potential effects within the various buffer zones (and the need for compensatory mitigation), any intervening uses between development sites and the protected area. For example, the development site indicated at Appendix A is within Zone Bii from Rombalds Moor, but is physically separated from the protected area by the extent of most of East Morton.	The point is noted. SC8 is currently a strategic core policy. This is an issue which needs to be considered in relation to the preparation of more detailed guidance on implementation.	512
SC8	4. Approach to management and mitigation measures and delivery of these.	Refinement of the approach to delivery of management and mitigation measures and further monitoring is an ongoing project.	513, 497, 447
SC8 / HRA report / supporting text in core strategy	4a. In order for the plan to comply with the Habitats Regulations, implementation strategies or supporting SPDs which deliver these measures should be referred to in the Core Strategy. Whilst these may not have been completed, confidence in the delivery of additional green space, access and site management measures is required to provide certainty that mitigation will prevent adverse effects. Unless green infrastructure and specific natural greenspace proposals are developed in advance, it is unlikely that adequate provision can be made to mitigate the impacts.	The conclusions to the HRA Report indicate: 'To ensure that delivery and funding mechanisms for avoidance and mitigation measures are taken forward, the Council will produce a Supplementary Planning Document to guide implementation of the South Pennine Moors Zones of Influence Policy...' This will provide the vehicle and focus for refining the approach to management and mitigation. We accept that there is further work to be done on integrating HRA management and mitigation measures within a wider approach to the provision of green infrastructure and open space.	497
SC8 / HRA report / supporting text in core strategy	4b. National policy under the heading plan-making at paragraph 165 requires local planning authorities to base their policies and plans on up to date information including an assessment of existing and potential	It is considered that Strategic Core Policies SC6 and SC8 and EN1, EN2 and EN4 provide sufficient detail for a core strategy and a strategic level plan. This is supplemented by information identified in sub-area sections under the Environment heading	447

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	<p>components of ecological networks. The Council have not set out in sufficient strategic detail how they intend to plan positively for “ the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.</p>	<p>which provides further detail that relates to the area under consideration. The evidence base generated by the HRA Report that relates to birds, habitat and visitor activities will inform future work. Information presented in the Growth Assessment Study in relation to ecological networks will also be an important element. More detailed work will inform the Allocations DPD.</p>	
<p>SC8 / HRA report / supporting text in core strategy</p>	<p>4c. The Council has recognised that further work needs to be undertaken to identify opportunities for new green space (paragraph 6.5.3). As part of this work, Bradford Council should consider whether existing green infrastructure or open space strategies provide a starting point for identifying opportunities for new or improved natural green space.</p>	<p>We accept that there is further more detailed work to be done on integrating HRA management and mitigation measures within a wider approach to the provision of green infrastructure and open space. However, it is considered that Strategic Core Policies SC6 and SC8 and EN1, EN2 and EN4 provide sufficient detail for a core strategy and a strategic level plan.</p>	<p>513</p>
<p>SC8</p>	<p>4d. Natural England remain concerned that detailed evidence regarding the implementation of policy SC8, particularly those measures which seek to avoid and/or mitigate the adverse effects of recreational pressure (alternative greenspace and access management) has not been identified in Chapter 6 of the HRA and that delivery has been deferred to a Supplementary Planning Document and Access Management and Monitoring Strategy. Both of which have not yet been provided. In order to increase confidence that these measures will be delivered and therefore adverse effects ruled out, the HRA should be supported by a draft copy of the SPD, or at least its scope, and detailed examples of</p>	<p>To ensure that delivery and funding mechanisms for avoidance and mitigation measures are taken forward, the Council will produce a Supplementary Planning Document to guide implementation of the South Pennine Moors Zones of Influence Policy...’ This will provide the vehicle and focus for refining the approach to management and mitigation. Work on this project is ongoing.</p>	<p>Natural England (updated pre-submission advice – Dec 2014)</p>

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	deliverable access management measures.		
SC8	4e. Management & mitigation sub-issue It is essential that landowners and tenants become involved in the implementation of the Plan, as it impacts on eco and geo sensitive areas. The plan should stress the need for close co-operation between potentially competing interests on the moors: grouse shooting, habitat restoration and species diversification, countryside leisure, sheep farming, water gathering.	This issue has been raised in the context of both SC8 and EN2. The Council is in broad agreement with the need for co-operation between different interest groups in relation to the future of sensitive moorland areas. It would be best addressed in relation to the context to EN2.	62
SC8 / Wharfedale	5a. Housing in Wharfedale should be reviewed in the light of the Habitats Regulations Assessment (HRA) and precise reduction calculations made public.	The updated HRA Report provides more clarity about the impact pathways in the HRA that have exercised an influence over settlement housing targets, including the use of bird and habitat survey work outputs to assess SHLAA 2013 sites.	159
SC8 / Wharfedale	5b. Assessing the impact of development within Ilkley's Bi site requires more work before decreasing apportionment to 800.	The updated HRA Report provides more clarity about the impact pathways in the HRA that have exercised an influence over settlement housing targets, including the use of bird and habitat survey work outputs to assess SHLAA 2013 sites. Assessment of the bird and habitat survey work outputs allowed the Council to have confidence that land to meet the level of development identified can be accommodated. While the HRA work that has taken place to date is considered to be sufficiently robust in relation to the level of risk and strategic decision making involved in a core strategy, it indicates that more detailed work will take place to inform the Allocations DPD.	2, 8, 35, 87, 159, 180, 265, 344, 358, 367, 370, 452, 464, 469, 470, 506
Policy SC9	Making Great Places		
SC9	1. Support for the Policy	Noted	103, 170, 447, 510

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SC9	2. What has BMDC used to measure “improve areas”	This part of the policy is based on NPPF paragraph 64. It is not intended to have a specific method to measure “improve areas” as every context is different. Further detail is provided in paragraph 3.125 which sets out the importance of having a good understanding of an area involving local communities and stakeholders to identify opportunities to improve areas.	179
SC9	3. Question how is it possible to create a well - connected network of routes and spaces when the natural limiting geographic factors of the Wharfe Valley are taken into consideration.	This part of the policy is based on NPPF paragraphs 61 and 69. There currently exists a network of footpaths which cross and traverse the natural geography of Wharfedale. The policy can help ensure that where relevant new developments link into these existing networks to help promote healthy lifestyles.	179
SC9	4. Keighley's topology is not like Bradford it can boast a ring of green (the countryside and Parkwood), which is highly visible from the town. Good design should recognise that this is conserved.	Policy SC9 states that developments should respond to the district's distinctive features including topography, green networks and landscape. Policy DS2 is a more detailed design policy in relation to landscape. Policies EN4 'Landscape' is based upon the Landscape Character Areas.	371
SC9	5a. The policy should be modified to include measurable elements of 'great places' alongside the subjective elements currently provided; and an appropriate range of quantifiable targets and indicators provided.	The scope of the policy is intended to be about Design (as defined in the NPPF and PPG). The suggested amendments go beyond this scope but good design clearly has an important role in helping to realise them. Therefore the policy could be amended to reflect the suggestions provided that it is consistent with the overall strategy and that it doesn't repeat or overlap with other policies. See 5a-5e below	394
SC9	5b. Measurable outcomes could include high development densities enabling compact	Whilst supported in principle introducing 'high development densities' may not be appropriate to	394

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	settlements, vitality of local services and public transport, surrounded by accessible, high quality countryside and interwoven with greenspaces.	the character of some parts of the district. There may be potential to modify the policy to refer to high densities where appropriate and to the other elements (compact settlements etc) provided this is consistent with the overall plan and doesn't repeat or overlap with other policies such as SC1, SC4, SC5, SC6 and HO5.	
SC9	5c. Measurable outcomes could include falling levels of air pollution, noise pollution and traffic congestion	The policy could be amended to reflect this but it may best be dealt with in other policies in the plan such as SC1, SC2 and the Transport and Environment policies.	394
SC9	5d. Measurable outcomes could include success rates in recycling derelict land and rejuvenating old housing and industrial building stock	The policy could be amended to reflect this but it may best be dealt with in other policies in the plan such as SC5, the sub-area policies, EC3, and HO6.	394
SC9	5e. Measurable outcomes could include improving responsiveness and resilience to climate change, through design excellence, zero carbon and lifetime standards in all new development, and increasing use of green infrastructure, strong ecosystems and responses to extreme weather	The policy could be amended to reflect this but it may best be dealt with in other policies in the plan such as SC2, EC4 and HO9.	394
SC9	5f. Measurable outcomes could include Increasing coverage of Neighbourhood Plans, local designations of environmental and cultural assets and increasing levels of civic participation	Neighbourhood Plans are listed as an Indicator of the policy. The supporting text to the policy (paragraph 3.125) refers to the need for community participation as does Policy DS1. Local designations of environmental and cultural assets would probably be best dealt with in other policies such as SC6 and the Environment policies.	394
SC9	6. The policy should promote, where possible, the protection and enhancement of the natural environment within developments. The NPPF seeks to deliver net-gains in biodiversity and	The policy could be amended to reflect this provided that it doesn't repeat or overlap with other policies in the plan such as SC6 or EN2. Policy DS2 seeks to retain existing natural features within	513

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	encourages planning authorities to take opportunities to incorporate biodiversity in around developments.	developments and to take opportunities to create/enhance green corridors.	
Key Diagram			
Key Diagram	1. The acknowledgment of the route of the proposed Bradford Canal is welcomed.	Noted.	165

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Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue)</i>	Council's Response	Respondent
Section 4.1	Regional City of Bradford Sub-Area		
BD1	Issue A (IA) - Apportionment & distribution		
BD1 (A)	(IA) 1. Support for the policy	Support noted.	431
BD1 (C1), BD1 (C2)	(IA) 1a. Support for the policy	Support noted.	431
BD1	(IA) 1b. Support the policy and that the number of new homes being delivered across the District are in line with the hierarchy of settlements	Support noted.	188
BD1 (A)	(IA) 1c. Support for the housing apportionment in NE Bradford	Support noted.	444 447
BD1 (C3), BD1 (C4)	(IA) 1d. Support for the proposals for NW and SW Bradford	Support noted.	447
BD1 (A)	(IA) 1e. General support for the level of residential development in the City Centre and Shipley and Canal Road Corridor	Support noted.	447
BD1 (A)	(IA) 2. The housing apportionment of 3,200 dwellings within the Shipley and Canal Road Corridor should be identified as a minimum figure	The Sub Area policies the place specific spatial vision of where the District should be by 2030. The strategic policies relating to housing numbers are set out in section 5.3 of the Plan and Policy BD1 takes its targets from Policy HO3. The Core Strategy needs to provide clarity and confidence as to both the level of new homes being planned at a settlement and sub area level and the implications of that growth. A target expressed as a minimum would not therefore be appropriate.	510
BD1 (A)	(IA) 3. The apportionment for the Shipley and Canal Road Corridor should be increased given	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The	407

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	the land opportunities for development	strategic policy setting out the housing distribution is set out in Section 5.3 of the Plan and more specifically in Policy HO3. A higher target would not be appropriate and would not be deliverable given the nature of the available land supply.	
BD1 (A)	(IA) 4. The apportionment for Bradford SE is disproportionately high	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policy setting out the housing distribution is set out in Section 5.3 of the Plan and more specifically in Policy HO3. The housing apportionment in Bradford SE is higher due to the proposed urban extension at Holme Wood which in turn reflects the sustainability of the area for growth. A further response to this issue is contained within the housing section of the summary of responses to the Publication Draft representations.	412
BD1 (A)	(IA) 5. Proposed housing developments in Airedale and Wharfedale will not satisfy the demand in Bradford District, namely for affordable housing in Bradford	The Council disagrees with this assertion. The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The SHMA has indicated that Wharfedale and Airedale lie within an overall Bradford market area and that there is a need for affordable homes across the district and not just in the Regional City. Policy HO11 seeks to achieve an appropriate balance of setting affordable housing requirements at a level which will help meet the overall need for affordable housing across the district, while taking into account economic viability, affordability and overall housing distribution. Policy AD1 reflects policy HO11 and in conformity to the NPPF para 47, 50 and 173-174.	361
BD1 (B1)	(IA) 6. Proposed housing developments in	The Sub Area policies the place specific spatial vision of	361

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	Airedale and Wharfedale will not assist the regeneration of the City Centre	where the District should be by 2030. The Plans strategy is to plan for growth across all areas of the District over the Plan period, irrespective of regeneration efforts in the City Centre. The regeneration of the City Centre will be the subject of a Bradford City Centre Area Action Plan. Policy AD1 reflects the strategic housing policies within the Plan.	
BD1 (B2)	(IA) 7. Recognition should be given to the Bolton Woods Quarry as a strategic site	The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The change proposed by the objector may make Policy BD1 (B2) clearer but it is not in itself required to make the plan sound. In addition the Bolton Woods Quarry site will be the subject of the Shipley and Canal Road Area Action Plan, which will be subject to separate consultation and landowner engagement where the site specific issues will be considered in detail.	407
BD1 (A)	(IA) 8. An extended and clearer strategic framework for the Canal Road Corridor is required in the plan	The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The Core Strategy provides clear detail on the role of Canal Road Corridor as appropriate to a strategic level document. The Area Action Plan will set out the detailed site allocations and designations in line with the strategic policies in the Core Strategy.	447
BD1 (B3)	(IA) 9. Further clarification is required on the strategic framework and key proposals for the Leeds Bradford Corridor	The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The Core Strategy sets out an appropriate level of detail for a strategic document in both the sub area policies and associated thematic policies. The allocations DPD will consider the detailed site allocations and other designations in line with the Core Strategy.	447
BD1 (E1)	(IA) 10. The general extent of the proposed country park should be clearly described	The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The nature and	447

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		<p>extent of green space improvements will be considered in detail through the allocation DPD. This will examine the need for new and improved green space. At the same time the Council will look to work with land owners and partners to improve the recreational use and biodiversity of the land within the Tong Valley.</p> <p>It is not appropriate for the Core Strategy at this point to designate a country park.</p>	
BD1 (A)	(IA) 11. The residential development is strongly reliant on the provision of infrastructure	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	447
BD1 (C1), BD1(C4), HO3	(IA) 12. The Highways Agency is committed to working with the Council to deliver the schemes necessary to the strategic road network to support this level of development	Comment noted.	161
BD1 (D3), EC3	(IA) 13. The Highways Agency is committed to working with the Council to deliver the schemes necessary to the strategic road network to	Comment noted.	161

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	support this level of development		
BD1	Issue B (IB) - Economic Development		
BD1 (C2)	(IB) 1. Support for a new employment opportunity at Apperley Bridge	Noted	444, 447
BD1 (D)	(IB) 2. Support for the City of Bradford being the focus for economic development and growth	Noted	510
BD1 (C2)	(IB) 3. The policy is too prescriptive, in referring to specific development at Apperley Bridge, and would not allow flexibility over the lifetime of the plan should circumstances change, as advocated by paragraph 21 of NPPF. Amended policy wording suggested; “A new employment opportunity including high quality research and development and new economy businesses linked to the Airedale Corridor will be located at Apperley Bridge.”	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD and Area Action Plans for the City Centre and the Shipley/Canal Road Corridor. The suggested policy wording provides greater flexibility, but does not alter the nature of the policy and does not make the Plan unsound.	444
BD1	(IB) 4. The policy should also provide for regeneration of the Shipley Canal Road Corridor through retail development	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD and Area Action Plans for the City Centre and the Shipley/Canal Road Corridor. The current drafting of the policy, without reference to any specific retail development, does not make the Plan unsound.	435
BD1 (B)	(IB) 5. The importance of retail development to facilitate delivery is underplayed	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. More specific policies and land allocations will be contained in the	510

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		Allocations DPD and Area Action Plans for the City Centre and the Shipley/Canal Road Corridor.	
BD1 (D4)	(IB) 6. The development of Shipley Town Centre is supported, but there are no indications of how this will be achieved	Comment noted The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD and Area Action Plans for the City Centre and the Shipley/Canal Road Corridor.	361
BD1	Issue C (IC) - General Infrastructure		
BD2 (C)	(IC) 1. Support the intention to provide infrastructure, including flood risk management measures, to support the regeneration initiatives on the Shipley canal Road corridor	Noted	123
BD1 (F)	(IC) 2. Greater clarity and feasibility of delivery is required for many of the key infrastructure schemes, with more details from the Infrastructure Plan being included in the plan.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	447
BD1	(IC) 3. Housing allocations to meet the	Comment noted.	123

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	proposed distribution of housing needs to be aligned with the provision of infrastructure, particularly in NW Bradford where waste water infrastructure will be required in some locations	It is acknowledged that Yorkshire Water is an infrastructure provider and stakeholder.	
BD1 (E4)	(IC) 4. Blue and green infrastructure should be developed in accordance with the Bolton Woods Masterplan and the Strategic flood Risk Assessment.	Comment noted. The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes, included blue and green infrastructure, could be promoted.	510
BD1 (A)	(IC) 5. Shipley Parliamentary Constituency settlements do not have the infrastructure to support the proposed apportionment; Stretched resources Congestion Some area / villages are remote from high quality public transport links Funding for Shipley Eastern Relief Road is not secure	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where	361

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		specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.	
BD1	Issue D (ID) - Infrastructure – Social		
BD1 (C)	(ID) 1. Support the need to promote healthy strong and inclusive communities	Noted	510
BD1	Issue E (IE) - Green Belt		
BD1 (C2)	(IE) 1. Support, including changes to the green belt to facilitate the delivery of the technology park at Apperley Bridge	Noted	123
BD1 (C2)	(IE) 2. Oppose the use of green belt land for development	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases that will be required to deliver longer term housing and jobs growth in the District. NPPF paragraph 47 makes it clear that Local Plans should meet their objectively assessed housing need in full. Paragraph 83 allows for the review of Green Belt through the preparation of the Local Plan and any changes made to the Green Belt would have to be supported by exceptional circumstances. The most current and up to date evidence provided by the SHLAA has identified that the objectively	36

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		assessed need cannot be met in full without altering the Green Belt under these exceptional circumstances. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. More specific policies and land allocations, detailing the exact releases in Bradford will be contained in the Allocations DPD.	
BD1	(IE) 2a. The housing apportionment is not opposed in principle, but concerned about the use of green belt and greenfield releases to achieve this.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases that will be required to deliver longer term housing and jobs growth in the District. This makes it clear that consideration will be given to the purposes of green belt in NPPF and also strategic importance of Green belt within the LCR. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The SHLAA has assessed both greenfield sites and previously developed land sites across the district. There are not enough developable brownfield sites to avoid some development in greenfield and Greenbelt sites. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD.	409
BD1	(IE) 2b. Impossible to assess from the policies which areas of Greenfield and Greenbelt land in each sub-area will be affected by the policies. Without this connection it is difficult to assess the degree to which policies have been positively prepared in pursuit of sustainable development	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Based on the most up to date evidence the objectively assessed need cannot be met without the need for significant release of land from the current Green Belt under NPPF exceptional circumstances and the use of green field sites. Policy SC7 identifies the approach to Green Belt releases that will be required to deliver longer	394

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		<p>term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The Strategy to direct the Majority of growth to the Regional City, then Principle Towns and growth areas is contained in Policy SC4. The Core Strategy is supported by the Growth Study which looked at the land around all settlements with regard to the role and function of the Green Belt at a broad level and did not indicate any significant issues for delivering the strategy. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD, Policy HO7 aims to direct development that is as sustainable as possible.</p>	
BD1 (A)	(IE) 3. The exceptional circumstances for development in the green belt have not been met	<p>The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District. The NPPF allows for a review of the Green Belt through Local Plan production or review and allows boundary changes under exceptional circumstances. The objectively assessed Housing Requirement for the plan period cannot be met in full without the use of land currently designated as Green Belt. The Bradford Growth Assessment has indicated that there are options for green belt change in sustainable locations and where such development would not undermine the functioning of the green belt either strategically or locally. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD. Policy BD1 reflects SC7, NPPF and the strategic policies that drive</p>	361

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		the pattern of development in sections 5.1.and 5.3.	
BD1 (C1) Holme Wood	(IE) 4. The proposed green belt release is not consistent with paragraph 79 & 80 of NPPF, as the development of the urban extension would contravene the five purposes of the green belt.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District. The Policy specifically requires any review to consider the purposes of the Green Belt as set out in NPPF as well as the strategic functions of the Green Belt. Policy SC5 and the NPPF recognise urban extensions as a sustainable means of meeting unmet need under exceptional circumstances. The Growth Study has supported this location for an urban extension as a sustainable location and one which would not unduly harm the strategic functioning of the green belt in this area. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. More specific policies and land allocations, detailing the exact releases for the Urban Extension at Holme Wood will be contained in the Allocations DPD. Policy BD1 C1 reflects the above sections.	33, 45, 54, 75 76, 77, 78, 86, 89, 95, 99, 100, 101, 124, 127, 130, 134, 162, 173, 176, 181, 193, 194, 195, 196, 207, 215, 216, 338, 356, 373, 380, 387, 414, 416, 424, 417, 419, 420, 422, 433, 455, 456, 457, 482, 499, 509, 515,
BD1 (C1) Holme Wood	(IE) 5. The evidence that the Council has exhausted all other options before taking land out of the green belt has been ignored, given the promotion of development in the T&HWNDP	The NPPF requires Local Plans to meet their objectively assessed need, this requirement can not be fully met without Green Belt releases. Policy HO2 B2 refers to the Urban extension. The policy does not and can not expect that all brownfield land should be developed first. Policy SC7 identifies the policy considerations for the review of the Green Belt and Policy SC5 allows for the consideration of Urban Extensions. The proposed Urban Extension at Holme Wood has been indentified as a	75, 76, 77, 78, 86,100, 130, 173, 414, 417, 420, 456,

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		strategic source of supply to meet the District’s objectively assessed need. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD. The current drafting of policy BD1 C1 reflects Policies, SC5, SC7, HO1, HO2 and HO3.	
BD1 (C1) Holme Wood	(IE) 6. This land should not be taken out of the green belt as it provides for	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases that will be required to deliver longer term housing and jobs growth in the District. The Policy makes reference to the 5 purposes in NPPF but does not repeat them. The NPPF and Policy SC5 recognise that urban extensions can be sustainable means of meeting unmet need under exceptional circumstances. The Growth Study supports Holme Wood as a location for an urban extension with a sustainable location. The strategic policies driving the pattern of development across the district and the need for Green Belt releases including the Urban Extension are set out in sections 5.1 and 5.3 of the plan. Policy HO7 sets out a range of more detailed considerations and principles when allocating land for housing. Any allocation of land removed from green belt to be allocated for development would also be considered against these site allocation principles which will look at other considerations of any land to be allocation beyond the green belt purposes.	
BD1 (C1) Holme Wood	(IE) 6a. Leisure and recreation	Response as above.	33, 40, 45, 49, 54, 75, 90, 98, 124,

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			176, 181, 185, 194, 206, 207, 215, 216, 356, 387, 419, 424, 429, 433, 442, 455, 491, 514, 520,
BD1 (C1) Holme Wood	(IE) 6b. Agriculture and food production	Response as above.	33, 49, 95, 194, 373, 520,
BD1 (C1) Holme Wood	(IE) 6c. Supports the local economy	Response as above.	194, 419,
BD1 (C1) Holme Wood	(IE) 6d. Once developed it is lost forever	Response as above.	33, 54, 112, 124, 195, 196, 373, 520,
BD1 (C1) Holme Wood	(IE) 6e. Supports wildlife	Response as above.	33, 85, 124, 206, 373, 482,
BD1 (C1) Holme Wood	(IE) 6f. Involves the loss of countryside	Response as above.	44, 45, 54, 56, 162, 181, 207, 216,
BD1 (C1) Holme Wood	(IE) 6g. Supports the local built and landscape heritage	Response as above.	45, 54, 75, 90, 95, 98, 124, 162, 181, 185, 207, 215, 216, 353, 379, 416,

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			419, 432, 455, 456, 458, 514
BD1 (C1) Holme Wood	(IE) 6h Adversely affect the green belt in Leeds	Response as above.	134,
BD1 (C1) Holme Wood	(IE) 6i. The urban extension would merge Leeds and Bradford and adversely affect Fulneck and Pudsey	Response as above.	85, 379
BD1 (C1) Holme Wood	(IE) 7. The case for development in the green belt is not proven.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases that will be required to deliver longer term housing and jobs growth in the District. The Policy makes reference to the 5 purposes in NPPF but does not repeat them. The NPPF and Policy SC5 recognise that urban extensions can be sustainable means of meeting unmet need under exceptional circumstances. The Growth Study supports Holme Wood as a location for an urban extension with a sustainable location which would not unduly harm the strategic functions of the Green Belt. The strategic policies driving the pattern of development across the district and the need for Green Belt releases including the Urban Extension are set out in sections 5.1 and 5.3 of the plan.	136, 162, 181, 207, 216, 380, 420, 456,
BD1	Issue F (IF) - Environment & Character		
BD1 (B1)	(IF) 1. Support for the regeneration and renewal priorities for Bradford City Centre	Comment noted.	103
BD1 (A) Shipley	(IF) 2. Concerns about the potential impact of the proposed level of housing growth at Shipley might have on the Outstanding Universal Value of the World Heritage Site at Saltaire. Suggested policy addition.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The Council agrees with the objector that it is important that the plans policies and proposals preserve, protect and enhance the World Heritage Site of Saltaire and that	103

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	<p>Add the following to the end Policy BD1, Criterion B.2:- “The new homes around Shipley will be delivered in a manner which will safeguard those elements which contribute to the Outstanding Universal Value of Saltaire”.</p>	<p>housing will need to be carefully designed and located to achieve this. However, although laudable, the suggested change to Policy BD1 is not necessary as the principles behind the suggested change are already embedded within and fully reflected in the plan. The relevant parts of the plan are:</p> <ul style="list-style-type: none"> • objective 12, which states that the historic built and natural heritage should be safeguarded and enhanced; and • parts B7 and B11 of Policy SC1 which state that the character and qualities of the districts heritage should be protected and enhanced, (B7);.and ensuring that developments are of a high quality and well designed so they contribute to protecting and enhancing the local setting and heritage (B11); • parts A and B of Policy EN3. Part A states that the Saltaire World Heritage Site management Plan will be used as a mechanism for protecting, managing and enhancing the Outstanding Universal Value (OUV) of the Saltaire World Heritage site. Part B requires proposals within the World Heritage sites buffer zone to conserve elements which contribute towards it’s OUV. <p>The Council therefore considers that Policy BD1 is sound as drafted and the additional suggested text is not needed and would duplicate other aspects of the plan.</p>	
<p>BD1 (B3)</p>	<p>(IF) 3. Regeneration initiatives for Manningham should be conservation led. Suggested policy amendment.</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p>	<p>103</p>

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	Amend the end of Policy BD1, Criterion B.3. along the following lines:- "... via the creation of new housing and economic growth, heritage-led regeneration, and community infrastructure".	<p>Policies for the Historic Environment are found in EN3.</p> <p>The Council considers that the policy as drafted is sound. The proposed change would not make the policy any clearer and would create unnecessary duplication.</p>	
BD1 (C1)	<p>(IF) 4. No assessment has been undertaken on the potential impact the proposed Home Wood urban extension might have on the Registered Battlefield at Adwalton and other designated heritage assets in the vicinity.</p> <p>Undertake such an assessment and suggested policy addition.</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>The Council have undertaken an assessment of the Potential impact of the Core Strategy on the Registered Battlefield and key considerations and mitigation which could inform site choices in line with the strategy. These are not considered significant enough to prejudice the development strategy of the plan and can be addressed through the site selection process within the Allocations DPD.</p>	103
BD1 (D5)	<p>(IF) 5. The policy is not explicit enough about fully utilising the potential of the World heritage Site to contribute to the future economic well being of the District.</p> <p>Suggested policy amendment.</p> <p>(a) Delete Policy BD1, Criterion D.5 and replace with:- "Exploit the full potential which Saltaire can make to the District's economic well-being by encouraging appropriate leisure and tourism-led mixed use developments,</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>The strategic policies relating to Heritage are set out in the strategic objective 12; a policy SC1 B7 and B11; and EN3 of the Plan.</p> <p>EN3 (A) A Saltaire World Heritage Site management Plan will be used as a mechanism for protecting, managing and enhancing the Outstanding Universal Value (OUV) of the Saltaire World Heritage site.</p> <p>EN3 (B) This requires development proposals within the</p>	103

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	enhancements of the public realm, improved links between the World Heritage Site and with other tourist attractions in the Airedale corridor whilst ensuring that the outstanding universal value of the World Heritage Site is safeguarded for present and future generations”	World Heritage sites buffer zone to conserve elements which contribute towards it’s OUV. The Council considers that the policy as drafted is sound. The proposed change is not required and would add unnecessary duplication.	
BD1 (E5)	(IF) 6. Specific references should be made to the particular heritage assets that are especially important in this part of the District. Suggested policy amendment. Amend Policy 1 (BD1) Criterion E.5 to read:- “Conserve and enhance the area’s heritage assets especially those in the City Centre, Little Germany, Goitside and Manningham and the Registered Battlefield at Adwalton”.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The Council considers that the policy as drafted is sound. The proposed change is not required and would add unnecessary detail.	103
Para 4.1.2	(IF) 7. One of the outcomes of the Holme Wood urban extension is that it has been developed in a manner which safeguarded heritage assets in the vicinity, especially the Registered Battlefield. Suggested text amendment. Paragraph 4.1.2 line 5 amend to read:- “The urban extension to Holme Wood, whilst safeguarding the setting of the nearby Registered Battlefield at Adwalton and other heritage assets nearby, has allowed for the creation of a sustainable etc...”	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The Council have undertaken an assessment of the Potential impact of the Core Strategy on the Registered Battlefield and key considerations and mitigation which could inform site choices in line with the strategy. These are not considered significant enough to prejudice the development strategy of the plan and can be addressed through the site selection process within the Allocations DPD.	103
Para 4.1.3 – 4.1.6	(IF) 8. To better reflect policies SC5 A 1 and	The Sub Area Policies are the place specific spatial	103

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	<p>BD1 B 1, by 2030 the intension should be that heritage led regeneration initiatives have secured a sustainable future for the historic buildings in the area contributing towards meeting the need for offices and homes in the City Centre.</p> <p>Suggested text amendment. Add the following additional Paragraph after Paragraph 4.1.6:- Heritage-led regeneration initiatives have secured a sustainable future for the historic buildings of the City Centre, especially in Little Germany and Goitside, and the reuse of these buildings has contributed towards meeting the needs for offices and new homes in the City Centre”.</p>	<p>visions of where the District should be by 2030.</p> <p>Policies for the Historic Environment are found in EN3. SC5 is the Strategic Core Policy for the Location of Development.</p> <p>The Council considers that the policy as drafted is sound. The proposed change is not required and would add unnecessary detail.</p>	
BD1 (C2)	(IF) 9. The Trust supports the upgrade of the canal towpath	Noted.	165
BD1 (F11)	(IF) 10. The Trust supports the improvements of the canal towpath	Noted.	165
BD1 (F11)	(IF) 11. Policy should be amended; ‘The proposed route of the Bradford Canal as identified on the key Diagram will be safeguarded from development in order to enable a future restoration scheme’	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>The route of the proposed Bradford Canal is shown on Fig BD1: The Spatial Vision Diagram.</p> <p>The document as written is not unsound. More specific policies and land allocations will be contained in the Allocations DPD and Area Action Plan for the Shipley/Canal Road Corridor.</p>	165
BD1 (E6)	(IF) 12. Support the principle of maximising renewable and low carbon technologies	Noted.	510

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Figure BD1	(IF) 13. Support for the intentions set out for Saltaire	Noted	103
POM BD1 (E1) Holme Wood	(IF) 14. The plan fails to recognise the special landscape character and historical significance of parts of SE Bradford.	The Council recognise and have significant understanding of both the landscape and the heritage of the District. This is set out in the evidence base. In particular the plan is supported by a detailed landscape character assessment which includes land around South east Bradford. There is also a full set of conservation area assessments and full records of listed buildings. Policy Ho7 sets out a range of detailed considerations and principles when allocating land for housing including landscape setting. Heritage and landscape considerations will be inform site selection in the Allocations DPD.	
POM BD1 (E1) Holme Wood	(IF) 14a. The special landscape character of Tong Valley	See above	101, 130, 173, 194,
POM BD1 (E1) Holme Wood	(IF) 14b. Tong Village Conservation Area	See above	101, 194,
POM BD1 (E1) Holme Wood	(IF) 14c. The relationship with the Moravian settlement of Fulneck, in Leeds MDC.	See above	101, 194, 380
POM BD1 (E1) Holme Wood	(IF) 15. The plan should incorporate proposals for a Leeds/Bradford country park that includes Tong Valley.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The nature and extent of green space improvements will be considered in detail through the allocation DPD. This will examine the need for new and improved green space.	101, 130, 173, 194, 380, 414, 457, 482,

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		<p>At the same time the Council will look to work with land owners and partners to improve the recreational use and biodiversity of the land within the Tong Valley.</p> <p>It is not appropriate for the Core Strategy at this point to designate a country park.</p>	
BD1	Issue G (IG) - Transport issues		
BD1 (F)	(IG) 1. Support for the policy principle for transport	Support noted.	161
BD1 (F10)	(IG) 1a. Support for the policy	Support noted.	487
BD1 (F)	(IG) 2. Support the overall thrust of the policy to reduce the demand for travel, encourage and facilitate the use of sustainable travel modes, limit traffic growth, reduce congestion and improve planning and journey times through planning and development decisions	Noted	510
BD1	(IG) 3. Concerns about the lack of road infrastructure to support development	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure, including road infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan</p>	409

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		<p>Documents and Supplementary Planning Documents where specific infrastructure schemes, included blue and green infrastructure, could be promoted.</p> <p>Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p>	
BD1 (A) Baildon	<p>(IG) 4. The plan proposes house building and commercial development without the necessary infrastructure and transport improvements being guaranteed;</p> <p>Particularly Shipley Eastern Link Road Baildon has one local and suitable bridging point which leads to traffic congestion</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p> <p>Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth</p>	1

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		and development.	
BD1 (C1)	(IG) 5. Proposed housing and industrial development will have an impact on health, through traffic pollution and harmful vibrations caused by heavy industrial traffic on unsuitable roads	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. Policy TR6 J supports measures to reduce the adverse impact of freight movement on air quality. Policy EN6 A, and paragraphs 4.5.178 – 4.5.182, specifically relate to Air Quality initiatives. The Core Strategy has been the subject of a Health Impact Assessment, and noted that, overall, the impact of the Core Strategy should positively contribute towards the future health of the District.	485
BD1 (C1)	(IG) 6. The transport infrastructure of the proposed development need to be considered proactively, not reactively	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure and considers this in as proactive manner as far as possible. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	485
BD1 (C1) Holme Wood	Issue H - Tong & Holme Wood Neighbourhood Development Plan (T&HWNDP)		
BD1 (C1) Holme Wood	(IH) 1. The T&HWNDP is not a Neighbourhood Development Plan within Schedule 9 of the	The Tong and Holme Wood Neighbourhood Plan pre dates the Localism Act and has not been produced under	101, 181, 207, 338,

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	Localism Act 2011 or the S38A of the Planning and Compulsory Purchase Act 2004.	<p>its provisions and there are no proposals to seek to formally adopted the neighbourhood plan under the Localism Act.</p> <p>It was commissioned by the Council in 2010 and was prepared with the Holme Wood and Tong Partnership Board. The document was subject to several stages of public consultation.</p> <p>The Document looked at the options for the long term regeneration of the estate including redevelopment within and also opportunities for growth on the edge of the estate.</p> <p>The Neighbourhood Plan was considered and endorsed by the Council in January 2012. The document has also informed ongoing service delivery within the estate as well as being a material planning consideration on development decisions.</p> <p>The Neighbourhood Plan and the consultation was used to inform the emerging Core Strategy in particular the opportunities for longer term growth including an urban extension.</p>	380, 414, 417, 432, 456, 457, 458,
BD1 (C1) Holme Wood	(IH) 1a. T&HWNDP fails to meet the requirements of the Localism Act.	Response as above	44, 56
BD1 (C1) Holme Wood	(IH) 1b. The Tong and Holme Wood Partnership Board has not been reshaped to meet the requirements of the Localism Act	Response as above	75, 76, 77, 78, 86, 99, 100, 130, 173, 414, 417, 457, 458, 482

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<p>BD1 (C1) Holme Wood</p>	<p>(IH) 2. The T&HWNDP is driving the Core Strategy, not being driven by it.</p>	<p>The Core Strategy has been informed by a range of evidence and documents.</p> <p>The Neighbourhood Plan has informed the development strategy. However other documents have also informed the approach. Of particular relevance is the Growth Study which looked comprehensively at the land around all settlements to ensure all reasonable options had been considered. This reaffirmed the acceptability of looking at a possible urban extension at Holme Wood.</p> <p>The Core Strategy has proposed an urban extension as part of meeting the housing need in the South East. The detailed scale and extent of the urban extension will be defined by the Allocations DPD. This work will be informed by the Neighbourhood Plan but will be subject to further more detailed assessment.</p>	<p>75, 76, 77, 78, 86, 99, 100, 101, 130, 173, 207, 215, 338, 380, 414, 417, 456, 457, 458, 482</p>
<p>BD1 (C1) Holme Wood</p>	<p>(IH) 2a. The CSFED consultation exercise was flawed. The decision by Executive on the T&HWNDP was made before the CSFED consultation period had ended.</p>	<p>The Core Strategy consultation process was appropriate and in line with the legal regulatory provisions as well as the Councils Adopted SCI.</p> <p>The Neighbourhood Plan is a stand alone document which was considered in moving to the publication draft in light of both comments on the Core Strategy FED and other evidence.</p>	<p>101, 162, 181, 207, 338, 380, 414, 417, 457 432, 456, 458, 482</p>
<p>BD1 (C1) Holme Wood</p>	<p>(IH) 2b. The ‘Minority Report’ on the T&HWNDP has never been acknowledged as representing the views of the non political community members of the Board</p>	<p>The Minority Report relates specifically to the Neighbourhood Plan and represents the views of some members of the Tong and Holme Wood Partnership but was not approved by that Partnership but rather left on record as a minority position. The Minority Report as well as the full range of views were considered as part of the Neighbourhood Plan preparation outside of the Local Plan</p>	<p>380</p>

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		process.	
BD1 (C1) Holme Wood	(IH) 2c. Not accepting the views of the community is contrary to localism	<p>The Core Strategy preparation process has undergone significant public consultation. Across the District and also targeted at Holme Wood. The summary of comments received at each stage are documented in the statements of consultation.</p> <p>The chosen strategy seeks to support the delivery of growth to meet the needs of the district in line with NPPF. This has been informed by a range of material including evidence and consultation. As far as it able the council has sought to address concerns of communities about development and change through the drafting of the policies.</p> <p>The Localism Act while providing new powers to communities to plan for their areas, makes clear these are powers to shape development not to prevent it.</p>	162
BD1 (C1) Holme Wood	(IH) 3. No objection is made to the apportionment of 900 for T&HWNDP in the Minority Report.	The Core Strategy has had regard to the potential growth identified in the Neighbourhood Plan. However it does not specify detailed break down of figures beyond the South East figure of 6,000. It does suggest how this will be delivered including reference to an urban extension but does not prescribe housing targets to this or the urban development potential. The detailed allocations process will determine the exact number of sites and consequent estimated housing numbers they could deliver as part of the Allocations DPD.	44, 45, 54, 56, 75, 76, 77, 78, 86, 90, 99, 100, 130, 162, 173, 380, 414, 417, 457, 458, 499
BD1 (C1) Holme Wood	(IH) 3a. The remaining 2100 should be added to other sectors of the regional city, or, the wider district as appropriate	<p>As noted above the Core Strategy does not replicate the figures in the Neighbourhood plan.</p> <p>The Council consider it appropriate and reasonable option</p>	458,

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		to plan for an urban extension at Holme Wood. This is supported by the evidence and accords with the settlement hierarchy which supports the City of Bradford as focus for development.	
BD1 (C1) Holme Wood	Issue I - Urban Extension at Holme Wood		
BD1 (C1) Holme Wood	(II) 1. General support for the urban extension at Holme Wood	Noted	447
BD1 (C1) Holme Wood	(II) 2. An extended and clearer strategic framework is required in the plan.	The Council will undertake further work as part of the Allocations DPD to define the appropriate extent and make up of the urban extension. The evidence in support of the Core Strategy provides a robust basis for the proposal.	447
BD1 (C1) Holme Wood	(II) 3. Further work and evidenced based assessment is required to support the proposal.	The Council will undertake further work as part of the Allocations DPD to define the appropriate extent and make up of the urban extension. The evidence in support of the Core Strategy provides a robust basis for the proposal.	447
BD1 (C1) Holme Wood	(II) 4. The size and location of the urban extension were not objectively assessed prior to the adoption on the T&HWNDP	The Core Strategy is only required to undertake to determine the objectively assessed need for housing for the district as a whole not the needs of individual settlements or communities. The plan then plans to meet that requirement. The Choice of development strategy is then determined with reference to the settlement hierarchy, land supply and planning constraints and sustainability considerations. There was no need or requirement for the neighbourhood plan to undertake to assess objective need.	101
BD1 (C1)	(II) 5. The urban extension is not the most	The Core strategy has been prepared in line with national	101, 338

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Holme Wood	appropriate strategy for the District. There is no evidence of the consideration of alternative options.	<p>guidance and undergone several round so consultation and engagement. This included several options for accommodating development and change.</p> <p>The Growth Study sets out the assessment of the areas around all settlements and informed the final strategy. The potential around Holme Wood performed well in this assessment when compared with other areas.</p> <p>The Core Strategy focuses the biggest proportion of development within the city of Bradford. This is appropriate given the scale of need and the existing infrastructure and services.</p> <p>The sustainability appraisal sets out the impact of the chosen approach.</p>	
BD1 (C1) Holme Wood	(II) 6. There is no evidence that Holme Wood would benefit from the Urban Extension, either socially or economically.	<p>The Neighbourhood Plan sets out some broad assumptions regarding regeneration benefits of development both within the estate and as part of an urban extension.</p> <p>The Core Strategy through focusing development and infrastructure investment in this area seeks to support regeneration both in terms of housing mix but also transport and connectivity to both jobs and services. It is reasonable and appropriate that the plan seeks to support regeneration. The actual details of delivery will be established through the Allocations DPD.</p>	75 76, 77, 78, 86, 99, 100, 130, 173, 414, 417, 458,
BD1 (C1) Holme Wood	(II) 6a. The Urban Extension could bring social damage to Holme Wood.	The objective of the Council is to support regeneration and long terms sustainability of the area.	75 76, 77, 78, 90, 124, 353, 380,
BD1 (C1)	(II) 6b. The Urban Extension could bring	Response as above	75 76, 77, 78,

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Holme Wood	economic damage to Holme Wood.		
BD1 (C1) Holme Wood	(II) 6c. The scale of the urban extension would divert efforts from the regeneration of the economic and social activity of Holme Wood.	The Council and partners are committed to the long term regeneration of the estate. The growth plans are one element of the work to support regeneration.	162
BD1 (C1) Holme Wood	(II) 6d. The urban extension will not assist the regeneration of Bradford.	The Neighbourhood Plan sets out some broad assumptions regarding regeneration benefits of development both within the estate and as part of an urban extension, and as such will assist the regeneration of Bradford, especially South East Bradford.	345
BD1 (C1) Holme Wood	(II) 6e. The urban extension will not meet the housing needs of the local population.	The Council disagrees. It is not clear why the objector has taken this view. The proposed urban extension lies close to the heart of the main urban area where the pressures caused by population and household growth are most acute. The Council is seeking to promote a mix of new housing as part of the regeneration / growth proposals and this will include housing affordable to a wide range of residents.	356
BD1 (C1) Holme Wood	(II) 7. The size of the urban extension is disproportionate to		
BD1 (C1) Holme Wood	(II) 7a. The housing growth it projects	The Core Strategy only projects the district wide housing need.	380
BD1 (C1) Holme Wood	(II) 7b. To the rest of the district	It is appropriate to focus development in the Regional City of Bradford as the major settlement with largest community and future needs	75, 456,
BD1 (C1) Holme Wood	(II) 8. The Plan should prioritise the development of brownfield sites before land is taken out of the green belt	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. As set out in HO2 the current evidence on land supply clearly shows the contribution that brownfield land makes towards meeting the District's housing needs. The PDL	33, 45, 49, 54, 75, 76, 77, 78, 85, 112, 124, 127, 181,

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		strategy, table 4 Appendix 6 and Policy HO6 of the Plan, reflect the realities of the amount of deliverable and developable brown field land in the district, as evidenced by the SHLAA. The plan seeks to maximise the use of brownfield, Policy HO7 on site allocation principles expresses this, but recognises the use of greenfield and Green Belt land to meet requirements in line with NPPF. There is a clear need to release both greenfield and Greenbelt land to meet the housing needs in full. The strategic policies driving the pattern of development across the district and the need for Green Belt releases including the Urban Extension and the use of previously developed land are set out in sections 5.1 and 5.3 of the plan.	193, 206, 207, 216, 353, 416, 422, 429, 433, 442, 455, 458, 491, 499, 509, 520
BD1 (C1) Holme Wood	(II) 8a. Greenfield land within the urban area should be developed before land is taken out of the green belt	The Core Strategy recognises that there is a balance in order to support regeneration of urban areas as sustainable quality place to live, which means that important green space within the urban areas should be protected as part of the development strategy.	49,
BD1 (C1) Holme Wood	(II) 9. The urban extension is not deliverable within the timescale of the plan.	The extent of the urban extension would be considered as part of the allocations DPD. This would look to make the development allocations, designate any supporting infrastructure and revised green belt boundary.	101, 338,
BD1 (C1) Holme Wood	(II) 9a. There is no clear time frame for the urban extension	Response as above	75 76, 77, 78, 86, 99, 100, 130, 173, 181, 207, 414, 417, 456, 457, 482
BD1 (C1) Holme Wood	Issue J – Infrastructure Holme Wood		

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<p>BD1 (C1) Holme Wood</p>	<p>(IJ) 1. The infrastructure requirements of the District, in particular SE Bradford, have not been objectively assessed, particularly highway infrastructure.</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p>	<p>101, 338,</p>
<p>BD1 (C1) Holme Wood</p>	<p>(IJ) 2. There is little evidence that the infrastructure needs of the new community have been properly addressed,</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to</p>	<p>45, 75 76, 77, 78, 86, 95, 99, 100, 130, 173, 181, 207, 215, 380, 414, 417, 456, 457, 458, 475, 482,</p>

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		2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.	499,
BD1 (C1) Holme Wood	(IJ) 2a. Highway provision	Response as above	49, 86, 99, 100, 130, 173, 162, 181, 207, 215, 216, 373, 380, 414, 417, 420, 455, 456, 457, 458, 463, 482, 499, 515, 520,
BD1 (C1) Holme Wood	(IJ) 2b. Highway capacity and congestion	Response as above	33, 49, 54, 75 76, 77, 78, 86, 89, 90, 95, 124, 162, 181, 193, 195, 196, 207,

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			353, 356, 373, 414, 417, 419, 420, 422, 424, 433, 442, 456, 458, 463, 475, 491, 509, 515, 520,
BD1 (C1) Holme Wood	(IJ) 2c. Employment	Response as above	33,
BD1 (C1) Holme Wood	(IJ) 2d. Education	Response as above	33, 90, 195, 196, 216, 509,
BD1 (C1) Holme Wood	(IJ) 2e. Medical, health and social needs	Response as above	33, 90, 195, 196, 216,
BD1 (C1) Holme Wood	(IJ) 2f. Drainage and sewers, flooding, watercourses	Response as above	33, 90, 176, 195, 196, 373, 387, 442, 479, 491, 520,
BD1 (C1) Holme Wood	(IJ) 2g. Access to green space	Response as above	356
BD1 (C1) Holme Wood	(IJ) 3. There is little evidence that the impact on infrastructure on other Local Authority areas has been properly addressed	The Duty to Cooperate statement sets out how the Council has met the duty on strategic cross boundary issues. The Council will be undertaking further work on significant and relevant infrastructure as part of the Allocations DPD. This will involve cooperation with adjoining Councils as appropriate depending on the nature of the issues.	56, 75 76, 77, 78, 86, 99, 100, 130, 173, 181, 207, 414, 417, 432, 482,

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BD1 (C1) Holme Wood	(IJ) 3a. Highway capacity and congestion	Response as above	45, 56, 130, 185, 424, 514,
BD1 (C1) Holme Wood	(IJ) 3b. Education	Response as above	45, 185, 195, 196, 514,
BD1 (C1) Holme Wood	(IJ) 3c. Health provision	Response as above	45, 185, 195, 196, 514,
BD1 (C1) Holme Wood	(IJ) 3d. Flooding	Response as above	45, 54, 56,
BD1 (C1) Holme Wood	(IJ) 3e. Water and sewage disposal	Response as above	185,
BD1 (C1) Holme Wood	(IJ) 4. There will be adverse effects of additional traffic generated	Response as above	
BD1 (C1) Holme Wood	(IJ) 4a. On horse riders	Response as above	176, 387,
BD1 (C1) Holme Wood	(IJ) 4b. Social and recreational pursuits	Response as above	176, 387,
BD1 (C1) Holme Wood	(IJ) 5. The distribution of housing is acceptable subject to continuing discussions on the need for and nature of additional infrastructure provision related to the urban extension.	Comment noted	53
BD1	General		
BD1	Support for the policy	Support noted.	434
Section 4	Regional City of Bradford Sub Area		
BD2	1. Support the policy	Support noted.	188
BD2 (B)	2. Support for the intension to maximise the potential of heritage assets	Support noted.	103
	No issues raised		
BD1 (E1)	1. No issues raised or comments made	Noted.	354

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Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue)</i>	Council's Response	Respondent
Section 4.2	Airedale Sub Area		
AD1	Issue A (IA) Housing apportionment		
AD1 (A)	(IA) 1. Support for the broad level of distribution, but an amended higher figure will result from other objections proposing a redistribution of an enhanced requirement figure for the District	<p>The Council's substantive responses to the objector's arguments that the overall housing requirement should be increased and the distribution of the requirement amended is contained within the housing section of the summary of responses to the Publication Draft representations.</p> <p>The Publication Draft contains the strategy that the Council considers is the most appropriate option for meeting the housing needs of the District over the plan period.</p>	447
AD1 (A) Baildon	(IA) 2. Support for the general level of development, with the qualification that it will be slightly higher based on other objections to the housing requirement.	<p>The Council does not agree with the suggestion that the Baildon target should be slightly higher. Such an increase would not reflect the evidence base, land supply constraints and the need to preserve the setting of the Saltaire World Heritage site.</p> <p>The Publication Draft contains the strategy that the Council considers is the most appropriate option for meeting the housing needs of the District over the plan period.</p>	447
AD1 (A) Baildon	(IA) 3. House building in Baildon and Wharfedale, may have little effect on Bradford's housing problems, if Leeds people see them as an alternative to North Leeds.	The Sub Area policies are the place specific spatial visions of where the District should be by 2030. It is not entirely clear what point the objector is making here. The overall strategy is to plan for growth across all areas of the District over the Plan period. The housing	172

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		<p>requirement for the City of Bradford, as set out in Policy HO3, is 28,650, accounting for 68.1% of the Districts total. The SHMA indicates that there is a need for new homes in all parts of the district and not just Bradford. Furthermore, the Council cannot control who buys the homes which are built and there will be a degree of movement of people moving across the District boundary and visa versa. The policy reflects HO1 and HO3.</p>	
AD1 (A) Baildon	(IA) 4. Will lead to the loss of green fields	<p>The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The SHLAA has assessed both greenfield sites and brownfield sites across the district. There simply are not enough developable brownfield sites to avoid some development in greenfield and Green Belt sites. The NPPF make it clear that Local Plans are the appropriate mechanism for meeting this need. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD.</p>	208, 209
AD1 (A) Baildon	(IA) 5. Brownfield sites should be considered for housing	<p>The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The SHLAA has assessed both</p>	339, 366, 421

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		green field sites and brown field sites across the district. There simply are not enough developable brownfield sites to avoid some development in greenfield and Green Belt sites. The NPPF make it clear that Local Plans are the appropriate mechanism for meeting this need. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD.	
AD1 (A) Bingley	(IA) 6. Brownfield sites should be developed before the green belt boundaries are reconsidered	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. Policy HO2 and the current evidence on land supply show the contribution that brownfield land makes towards meeting the District's housing needs. It is unreasonable to expect that all brown field sites should be developed prior to releasing Green Belt as a five year supply of developable land is required by the NPPF and a managed phased release of sites will aid delivery by allowing some sustainable sites which are not dependent upon significant new infrastructure to be released early. The PDL strategy, table 4 Appendix 6 and Policy HO6 of the Plan, reflect the realities of the amount of deliverable and developable brownfield land in the district, as evidenced by the SHLAA. The plan seeks to maximise the use of brownfield, Policy HO7 on site allocation principles expresses this, but recognises the use of greenfield and Green Belt land to meet requirements in line with NPPF.	94, 106,
AD1 (A) Baildon	(IA) 7. Further house building on the green belt in Upper Baildon will not further Strategic Objective 12.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The strategic policies driving the pattern of development	339, 366

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		across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. Policy HO7, Housing Site Allocation Principles provides the context for careful consideration to be given to the scale and location of Green Belt releases in the Allocations DPD. Heritage assets and assessments have fed the SHLAA and will be a significant factor in the Allocations DPD as will Policy EN3 on Historic Environment.	
AD1 (A) Baildon	(IA) 8. Local green belt deletions will be necessary to meet the housing apportionment	Noted	447
AD1 (A)	(IA) 9. A 450 increase in homes over the next 15 years in Baildon is unsustainable.	The Council disagrees. Baildon is a very sustainable location for the modest scale of development proposed within the plan. The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policy setting out the housing distribution is set out in Section 5.3 of the Plan and more specifically in Policy HO3. The policy reflects HO3.	361
AD1 (A) Bingley	(IA) 10. Will lead to the loss of green fields	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The SHLAA has assessed both greenfield sites and brownfield sites across the district. There simply are not enough developable brownfield sites to avoid some development in greenfield and Green Belt sites. The NPPF make it clear that Local Plans are the appropriate mechanism for meeting this need. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD.	174, 476

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AD1 (A) Bingley	(IA) 11. Land approved for development needs to be developed before land is taken out of the green belt	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. Policy HO2 and the current evidence on land supply show the contribution that brownfield land makes towards meeting the District's housing needs. It is unreasonable to expect that all sites with planning permission or allocations on previously developed land should be developed prior to releasing Green Belt, as a five year supply of developable land is required by the NPPF and a managed phased release of sites will aid delivery by allowing some sustainable sites which are not dependent upon significant new infrastructure to be released early. The PDL strategy, table 4 Appendix 6 and Policy HO6 of the Plan, reflect the realities of the amount of deliverable and developable brown field land in the district, as evidenced by the SHLAA. The plan seeks to maximise the use of brownfield land, Policy HO7 on site allocation principles expresses this, but recognises the use of greenfield and Green Belt land to meet requirements in line with NPPF.	388
AD1 (A) Bingley	(IA) 12. Land should not be taken out of the green belt for housing development	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases that will be required to deliver longer term housing and jobs growth in the District. NPPF paragraph 47 makes clear that Local Plans should meet their objectively assessed housing need in full. Paragraph 83 allows for the review of Green Belt boundaries under exceptional circumstances through the preparation of the Local Plan. The strategic policies driving the pattern of	152

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		development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The SHLAA has assessed both green field sites and brown field sites across the district. There are not enough developable brown field sites to avoid some development in green field and green belt sites. More specific policies and land allocations, detailing the exact releases in Bingley will be contained in the Allocations DPD. The sub-area policy, as drafted, is considered sound.	
AD1 (A) Bingley	(IA) 13. Eldwick should be regarded as a village in its own right not as part of the Bingley urban sprawl	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. Eldwick is identified in the Settlement Study 2011 as being part of the urban area that makes up Bingley. The study takes into account a range of factors including the geography of the area and the level of services which are provided. (see Part 2, 4.1 Bingley, page 134-144). Paragraphs 3.56 – 3.60 of the Plan provide the explanation and justification of Bradford’s settlement hierarchy. The policy reflects SC4.	398
AD1 (A) Bingley	(IA) 14. Support for the level of development in Bingley. The development of the urban extension at Micklethwaite is essential to delivery during the early part of the plan period	Noted	447
AD1 (A) Cottingley	(IA) 15. Proposed number of houses would increase the housing stock by 30%. This is disproportionate to the existing village.	The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The figure quoted is not correct. The stock based on April 2013 Council Tax records was 2225 within the Core Strategy defined area of Cottingley. The modest proposal for just 200 new homes over 17 year period would represent a 9% increase. The Council consider that Cottingley is an eminently sustainable location for	82

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		such growth. The reference made in the text to 'local need' is a descriptive term to distinguish between areas proposed for significant development and growth and areas where much smaller scale development is proposed. It is not referring to a calculation. Policy AD1 reflects Policy HO3.	
AD1 (A) East Morton	(IA) 16. The reference to housing numbers should be qualified as being indicative or minimum figures.	The Sub Area Policies are the place specific spatial vision of where the District should be by 2030. The Council do not consider that it would be appropriate to specify the targets for the Local Service Centres as indicative or as minima. It is important that the Core Strategy contains proposals that give direction and certainty to the Local Plan process and as appropriate to the preparation of Neighbourhood Plans. This also enables the implications for targets to be clear. Expressing the targets as minima or indicative would reduce this certainty and clarity.	512
AD1 (A) Keighley	(IA) 17. The housing apportionment for Keighley should make reference to Riddlesden.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. Strategic policy HO3 sets the housing apportionment for Keighley which includes Riddlesden along with other similar settlements. It is not appropriate to list all settlements within Keighley.	512
AD1 (B) East Morton	(IA) 18. The reference to local need should be deleted	The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The reference made in the text to 'local need' is a descriptive term to distinguish between areas proposed for significant development and growth and areas where much smaller scale development is proposed. It is not referring to a calculation. Strategic policy HO3 identifies East Morton as a Local Service Centre with a housing target of 100 homes.	512
AD1	(IA) 19. Support for the policy. The delivery of	Noted	517

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Silsden	new homes will support the role of Silsden as a Local Growth Centre		
AD1 (A) Steeton with Eastburn	(IA) 20. Will lead to the loss of green fields	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The strategic policies driving the pattern of development across the district and the need for green field development and Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The PDL strategy and Policy HO6 reflect the realities of the amount of deliverable and developable brownfield land in the district, as evidenced by the SHLAA. The plan seeks to maximise the use of previously development land but recognises the use of greenfield and Green Belt land to meet requirements in line with NPPF. More specific policies and land allocations, detailing the exact parcels of land to be developed around Steeton and Eastburn will be contained in the Allocations DPD.	84, 201
AD1 (A) Steeton with Eastburn	(IA) 21. Will lead to the loss of agricultural land	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The National Planning Policy Framework, (NPPF) in section 11 para: 112, states that Local Planning Authorities (LPA) should take into account the economic and other benefits of the best and most versatile agricultural land. The NPPF refers to high quality agricultural land. In the Bradford district we do not have any Grade 1 or 2 agricultural land. The highest quality in Bradford is grade 3. Strategic Objective 16 seeks to safeguard and enhance agriculture as a natural resource. The SHLAA has assessed both green field sites and brown field sites across the district. There simply are not enough developable brownfield sites to avoid some development in greenfield and Green Belt sites. The	84

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		<p>strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. HO7 lists a range of principles to be used when identifying, assessing, comparing and allocating sites for housing development.</p> <p>The NPPF, Strategic Objective 16 and policy HO7 will be used to identify, assess and compare sites for development in the Allocations DPD.</p>	
AD1 (A) Steeton with Eastburn	(IA) 22. Steeton has done more than its fair share in providing new housing	<p>The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The strategic policies relating to housing are contained within section 5.3 of the Plan, in particular Policy HO3 which identifies Steeton-with-Eastburn with a housing target of 700 homes. Policy AD1 reflects Policy HO3. While the area has seen some development in the past this cannot be a prime criteria for the Council's future housing distribution strategy as there is no indication that Steeton cannot or shouldn't accommodate a modest proportion of the district's future housing needs.</p>	201
AD1 (A) Steeton with Eastburn	(IA) 23. Object to the broad distribution and in particular the apportionment of 700 dwellings at Steeton. This should be increased to 1500.	<p>The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The strategic policies relating to housing are contained within section 5.3 of the Plan, in particular Policy HO3 which identifies Steeton-with-Eastburn with a housing target of 700 homes. Policy AD1 therefore reflects Policy HO3. An increase in the target would not reflect the evidence base, land supply constraints, environmental factors and would not therefore represent the most sustainable option to provide for the area's housing needs.</p>	396
AD1 (A)	(IA) 24. Proposed housing developments in Airedale and Wharfedale will not satisfy the demand in Bradford District, namely for affordable	<p>The Sub Area policies the place specific spatial vision of where the District should be by 2030. Policy HO11 seeks to achieve an appropriate balance of setting</p>	361

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	housing in Bradford	affordable housing requirements at a level which will help meet the overall need for affordable housing across the district, while taking into account economic viability, affordability and overall housing distribution. Policy AD1 reflects policy HO11 and conforms with NPPF para 47, 50 and 173-174.	
AD1 (B)	(IB) 25. Proposed housing developments in Airedale and Wharfedale will not assist the regeneration of the City Centre	The Sub Area policies the place specific spatial vision of where the District should be by 2030. The Plans strategy is to plan for growth across all areas of the District over the Plan period, irrespective of regeneration efforts in the City Centre. The regeneration of the City Centre will be the subject of a Bradford City Centre Area Action Plan. The drafting of Policy AD1 reflects the strategic housing policies within the Plan.	361
AD1	Issue B (IB) Infrastructure		
AD1 (B)	(IB) 1. Support the targeting of infrastructure priorities for development in Airedale	Noted	190
AD1 (A)	(IB) 2. The plan proposes house building without the necessary infrastructure being guaranteed; Sewage system, Schools Health facilities Road network	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents	351

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		where specific infrastructure schemes could be promoted.	
AD1 (B)	(IB) 3. Shipley Parliamentary Constituency settlements do not have the infrastructure to support the proposed apportionment; Stretched resources Congestion Some area / villages are remote from high quality public transport links	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.	361
AD1 (A) Baildon	(IB) 4. The plan proposes house building and commercial development without the necessary infrastructure and transport improvements being guaranteed.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate	1, 4, 13, 43, 64, 65, 172, 212, 393, 409, 421

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		<p>infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p> <p>Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p>	
AD1 (A) Baildon	(IB) 4a. Particularly Shipley Eastern Link Road	Response as above	1, 4, 172, 212, 393
AD1 (A) Baildon	(IB) 4b. Baildon has one local and suitable bridging point which leads to traffic congestion	Response as above	1, 4, 212
AD1 (A) Baildon	(IB) 4c. Based on unrealistic expectations on the use of, and investment in, public transport	Response as above	4, 172
AD1 (A) Baildon	(IB) 4d. Parts have an infrequent bus service	Response as above	4
AD1 (A) Baildon	(IB) 4e. The prospects of any significant park and ride facility is very limited	Response as above	4, 172
AD1 (A) Baildon	(IB) 4f. Schools	Response as above	64, 65, 172, 208, 339, 340, 366,
AD1 (A)	(IB) 4g Health facilities	Response as above	64, 65, 172,

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Baildon			208, 339, 366,
AD1 (A) Baildon	(IB) 4h. Shops	Response as above	208
AD1 (A) Baildon	(IB) 5. There must be other areas more suited to the kind of infrastructure needed for housing growth	The Council has carried out a range of research and work which shows that the levels of development needed to meet the needs of the districts rapidly growing population is going to need the provision of supporting infrastructure wherever that growth is located. There are for example a number of road corridors where investment may be required. The issues in the case of Baildon are neither unique nor particularly more severe than in other parts of the district.	65
AD1 (A) Baildon	(IB) 6. Traffic congestion will result from the proposed building in the Canal Road Corridor and at Burley and Menston	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The Council has confidence that future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>The highway implications of any development in the Canal Road Corridor are being investigated and it would be intended to consider related congestion issues through this work</p>	172
AD1 (A) Baildon	(IB) 7. Planned housing for Baildon will not benefit from the transport infrastructure improvements for Lower Baildon (in Section 4.1)	The Council both disagrees with the point made by the objectors, and notes that no justification has been provided to support the point made.	339, 340, 366

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AD1 (A) Bingley	(IB) 8. The plan proposes house building without the necessary infrastructure	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	37, 94, 106, 174, 152,202, 436,
AD1 (A) Bingley	(IB) 8a. Schools	Response as above	37, 94, 106, 436
AD1 (A) Bingley	(IB) 8b. Health facilities	Response as above	37, 94, 106
AD1 (A) Bingley	(IB) 8c. Public transport	Response as above	37, 94, 106, 202,
AD1 (A) Bingley	(IB) 8d. Refuse collection	Response as above	37
AD1 (A) Bingley	(IB) 8e. Roads	Response as above	37, 94, 106, 152, 174, 202, 436, 476
AD1 (A) Bingley	(IB) 8f. Police surveillance	Response as above	37, 94, 106
AD1 (A) Bingley	(IB) 8g. Sewers	Response as above	94, 106

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AD1 (A) Cottingley	(IB) 9. The present infrastructure is already at saturation point and could not support any further housing development, particularly	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	82, 508
AD1 (A) Cottingley	(IB) 9a. highway capacity	Response as above	82, 508
AD1 (A) Cottingley	(IB) 9b. drainage	Response as above	82, 508
AD1 (A) Cottingley	(IB) 10. The plan does not require highway improvements in the Aire Valley ahead of development in Cottingley – the recent Saltaire improvements show that the highway lacks capacity.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not	494

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		<p>yet been made.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	
Para 4.2.4 - Silsden	(IB) 11. There is no evidence to support the investment in education	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>The findings from the LIP indicate that the issue in relation to school places and investment for physical improvements to existing schools are apparent across all parts of the district. Recent funding problems linked to the loss of Building Schools for the Future, compounded by major population growth (especially in the under 11 profile) means that there are a number of uncertainties surrounding whether or not the district can continue to provide a sustainable, high quality education service, across all parts of the district. Ensuring sufficient capacity will be one of the principal challenges for the district over the next 10 years.</p> <p>The Council's Children's Services have also produced an Education Organisation Plan (EOP), which considers</p>	68

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		<p>the educational needs in more detail. The outputs of the EOP have informed the LIP and will continue to inform the update or revision to the LIP.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	
AD1 (A) Steeton with Eastburn	(IB) 12. The plan proposes house building without the necessary infrastructure	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	84,
AD1 (A) Steeton with Eastburn	(IB) 12a. Schools	Response as above	84
AD1 (A) Steeton with Eastburn	(IB) 12b. Sewerage system/drainage	Response as above	84

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AD1 (A) Steeton with Eastburn	(IB) 12c. Public transport	Response as above	201
AD1 (A) Steeton with Eastburn	(IB) 12d. Additional parking at Silsden and Steeton Railway Station	Response as above	84, 201
AD1 (A) Steeton with Eastburn	(IB) 12e. Traffic congestion at Airedale General Hospital	Response as above	84
AD1	Issue C (IC) Environment & Character		
AD1 (C)	<p>(IC) 1. The international popularity of Haworth as a tourist destination and the other heritage tourist attractions along the Airedale corridor (Saltaire, East Riddlesden Hall, Cliffe Castle and the prehistoric landscapes of Baildon Moor) should be better exploited in order to deliver economic benefits to the District. Suggested policy addition</p> <p>Policy AD1, Criterion C add an additional Criterion along the following lines:- “Support initiatives which would promote and improve connectivity and linkages between Haworth and the other heritage tourist attractions along the Airedale corridor”</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>Policies for the Historic Environment are in EN3 and Transport policies are found in Section 5.2</p> <p>AD1 Section C considers Economic Development. Connectivity is considered under section AD1 (E) on Transport and E3 looks to improve links between villages in Airedale.</p> <p>The Council considers that the policy as drafted is sound. The proposed change is not appropriate for section AD1 (C) and would add unnecessary details and duplication if added to AD1 (E).</p>	103
AD1 (D4)	(IC) 2. Support the intention to protect and enhance the heritage of the river, beck and canal corridors	Noted	103
AD1 (D6)	(IC) 3. Criteria too generic and would benefit from specific reference to the heritage aspects which are of especial importance in this part of the	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.	103

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	District. Suggested policy amendments. Amend Policy AD1 Criterion E.5 to read:- “Conserve and enhance the heritage assets of the Airedale Corridor especially those elements which make a significant contribution to the distinct character of this area including: the mills, chimneys and associated housing of its textile heritage, the buildings and structures associated with the Leeds and Liverpool Canal, and the prehistoric landscapes and rock art of Rombald’s Moor”.	The Council have concluded that the amendment is to AD1 D6 in the Environment section rather than AD1 E5. Referring to specific areas would provide additional clarity but the policy as drafted is not unsound.	
Figure AD1	(IC) 4. Welcome the intention to enhance the heritage and archaeological value of the towns along the Airedale corridor	Noted	103
Paragraph 4.2.3	(IC) 5. Welcome the intention to better exploit the tourism and recreational potential of the heritage assets along the Leeds and Liverpool Canal	Noted	103
AD1	(IC) 6. The likely effects of the Airedale sub area policies upon the South Pennine Moors SSSI are not considered	Natural England’s representation states that the impact upon SSSI’s needs to be taken into account through Sustainability Appraisals. Later stages of Sustainability Appraisals will assess such effects in greater detail. Protection for SSSIs can be found in National Legislation.	513
AD1 (A) Baildon	(IC) 7. Concerns about the potential impact of the proposed level of housing growth at Baildon might have on the Outstanding Universal Value of the World Heritage Site at Saltaire. Suggested policy addition. (1) Sub Area Policy AD1, Criterion A reduce the number of residential units for Baildon to a level which is likely to be deliverable in a manner which	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The Council have carried out some further work to assess the capacity of sites which may be required to meet the proposed housing target for Baildon. It has concluded that a change to reduce the target is not justified. This work is explained in more detail in the section of the responses table which deals with Policy	103

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	<p>would safeguard the Outstanding Universal Value of the World Heritage Site, and</p> <p>(2) Add the following to the end of that part of Policy AD1, Criterion B which deals with Baildon:- “The new homes around Baildon will be delivered in a manner which will safeguard those elements which contribute to the Outstanding Universal Value of Saltaire”.</p>	<p>HO3.</p> <p>However the Council agrees with the objector that it is important that the plans policies and proposals preserve, protect and enhance the World Heritage Site of Saltaire and that housing will need to be carefully designed and located to achieve this.</p> <p>However, although laudable, the suggested change to Policy AD1 is not necessary as the principles behind the suggested change are already embedded within and fully reflected in the plan. The relevant parts of the plan are:</p> <ul style="list-style-type: none"> • objective 12, which states that the historic built and natural heritage should be safeguarded and enhanced; and • parts B7 and B11 of Policy SC1 which state that the character and qualities of the districts heritage should be protected and enhanced, (B7);.and ensuring that developments are of a high quality and well designed so they contribute to protecting and enhancing the local setting and heritage (B11); • parts A and B of Policy EN3. Part A states that the Saltaire World Heritage Site management Plan will be used as a mechanism for protecting, managing and enhancing the Outstanding Universal Value (OUV) of the Saltaire World Heritage site. Part B requires proposals within the World Heritage sites buffer zone to conserve elements which contribute towards it's OUV. 	
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		The Council therefore considers that Policy AD1 is sound as drafted and the additional suggested text is not needed and would duplicate other aspects of the plan.	
AD1 (D3)	(IC) 8. Support for the improvement of green infrastructure along the canal	Noted	165
AD1 (D4)	(IC) 9. Support for protection and enhancement of the canal corridors	Noted	165
AD1 (E3)	(IC) 10. Support for the improvements to the canal towpath	Noted	165
AD1 (D1) Bingley	(IC) 11. The landscape character and range of habitats will not be protected or enhanced by the development of 1400 houses in Bingley	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>Policy EN4: Landscape, states that policies and proposals should make a positive contribution towards the conservation, management and enhancement of the landscapes within the District. This should use the approach set out in the Landscape Character Assessment SPD.</p> <p>Policy EN2 seeks to protect biodiversity and geodiversity within the District. It identifies principles for enhancing the overall biodiversity and stemming losses. It identifies a range of factors that need to be taken into account in identifying potential land for development.</p> <p>More specific policies and land allocations, dealing with any land releases for housing in Bingley, in accordance with Policy HO7, will be contained in the Allocations DPD. The sub-area policy, as drafted, is considered sound.</p>	152

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<p>AD1 (D6) Bingley</p>	<p>(IC) 12. Refer to conservation and enhancement of the World Heritage Site when considering green belt deletions in Gilstead</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>Any housing allocations on land currently designated as Green Belt will be assessed against the rigours of Policy HO7, Site Allocation Principles, and will be considered in the Allocations DPD.</p> <p>Besides Policy SC7, identifying the approach to Green Belt releases that will be required to deliver longer term housing and jobs growth in the District, regard will also be given to Core Strategy Policy EN3, particularly:</p> <p>Policy EN3 (A) The Saltaire World Heritage Site management Plan will be used as a mechanism for protecting, managing and enhancing the Outstanding Universal Value (OUV) of the Saltaire World Heritage site.</p> <p>Policy EN3 (B) This requires development proposals within the World Heritage sites buffer zone to conserve elements which contribute towards it's OUV.</p> <p>The suggested policy amendment is not required. The policy as drafted is not unsound.</p>	<p>152</p>
<p>Paragraph 4.2.3 Bingley</p>	<p>(IC) 13. Bingley already has a good square for markets; Myrtle walk shopping centre and a library; Jubilee gardens does not need redesigning. It is Council services that are being run down.</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. In the Outcomes by 2030 section for Bingley a vision of what Bingley will be like in 2030 is set out.</p> <p>Any improvements to Jubilee gardens will depend on future programmes and funding.</p>	<p>152</p>

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		The inclusion of Jubilee Gardens in this vision does not make the plan unsound.	
AD1 (B) Keighley	(IC) 14. Support the heritage-led enhancements focussed on historic buildings such as Dalton Mills	Noted	103
Paragraph 4.2.2 Keighley	(IC) 15. Support the heritage-led regeneration proposals for Keighley	Noted	103
AD1 (D2) Silsden	(IC) 16. Support for the protection and enhancement of the South Pennine Moors SPA/SAC	Noted	68
AD1 (D7) Silsden	(IC) 17. Need to ensure that any renewable energy scheme does not impact on the South Pennine Moors SPA/SAC	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>The South Pennines Moors is designated as a Special Area of Conservation under the EC Habitats Directive. Policy SC8 protects the SPA and SAC from any adverse development.</p> <p>Policy EN6 B makes specific reference to ensuring that proposals for renewable energy will have no adverse impact on the integrity of the South Pennine Moors SAC/SPA.</p>	68
AD1	Issue D (ID) Green Belt		
AD1 (B)	(ID) 1. Impossible to assess from the policies which areas of Greenfield and Greenbelt land in each sub-area will be affected by the policies. Without this connection it is difficult to assess the degree to which policies have been positively prepared in pursuit of sustainable development	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Based on the most up to date evidence the objectively assessed need cannot be met without the need for significant release of land from the current Green Belt under NPPF exceptional circumstances and the use of green field sites. Policy SC7 identifies the approach to Green Belt releases that will be required to deliver longer	394

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		term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The Strategy to direct the Majority of growth to the Regional City, then Principle Towns and growth areas is contained in Policy SC4. The Core Strategy is supported by the Growth Study which looked at the land around all settlements with regard to the role and function of the Green Belt at a broad level and did not indicate any significant issues for delivering the strategy. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD, Policy HO7 aims to direct development that is as sustainable as possible.	
AD1 (B)	(ID) 2. The exceptional circumstances for development in the green belt have not been met	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District. The NPPF allows for a review of the Green Belt through Local Plan production or review and allows boundary changes under exceptional circumstances. The objectively assessed Housing Requirement for the plan period cannot be met in full without the use of land currently designated as Green Belt. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD. Policy AD1 B reflects SC7, NPPF and the strategic policies that drive the pattern of development in sections 5.1.and 5.3.	361
AD1 (B)	(ID) 3. The housing apportionment is not opposed in principle, but concerned about the use of green belt and greenfield releases to achieve this	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt	409

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		releases that will be required to deliver longer term housing and jobs growth in the District. This makes it clear that consideration will be given to the purposes of green belt in NPPF and also strategic importance of Green belt within the LCR. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The SHLAA has assessed both greenfield sites and previously developed land sites across the district. There are not enough developable brownfield sites to avoid some development in greenfield and Greenbelt sites. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD.	
AD1 (B)	(ID) 4. Aire Valley cannot support more housing development without infringement of the green belt and greenfields	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The PDL strategy, table 4 Appendix 6 and Policy HO6 of the Plan, reflect the realities of the amount of deliverable and developable brown field land in the district, as evidenced by the SHLAA. The plan seeks to maximise the use of brownfield, Policy HO7 on site allocation principles expresses this, but recognises the use of greenfield and Green Belt land to meet requirements in line with NPPF.	351
AD1 (B) Baildon	(ID) 5. Development in the green belt would jeopardise the World heritage status of Saltaire	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. Any housing allocations on land currently designated as Green Belt will be assessed against the rigours of Policy HO7, Site Allocation Principles, and will be considered in the Allocations DPD. Besides Policy SC7, identifying the approach to Green	69

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		<p>Belt releases that will be required to deliver longer term housing and jobs growth in the District, regard will also be given to Core Strategy Policy EN3, particularly: Policy EN3 (A) The Saltaire World Heritage Site management Plan will be used as a mechanism for protecting, managing and enhancing the Outstanding Universal Value (OUV) of the Saltaire World Heritage site.</p> <p>Policy EN3 (B) This requires development proposals within the World Heritage sites buffer zone to conserve elements which contribute towards it's OUV.</p>	
AD1 (B) Baildon	(ID) 6. Land should not be taken out of the green belt for development.	<p>The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases that will be required to deliver longer term housing and jobs growth in the District. NPPF paragraph 47 makes clear that Local Plans should meet their objectively assessed housing need in full. Paragraph 83 allows for the review of Green Belt boundaries under exceptional circumstances through the preparation of the Local Plan. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The SHLAA has assessed both green field sites and brown field sites across the district. There are not enough developable brown field sites to avoid some development in green field and green belt sites. More specific policies and land allocations, detailing the exact releases in Bingley will be contained in the Allocations DPD.</p>	340, 366, 421,
AD1 (B) Bingley	(ID) 7. Land should not be taken out of the green belt for development.	<p>The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt</p>	37, 436,

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		releases that will be required to deliver longer term housing and jobs growth in the District. NPPF paragraph 47 makes clear that Local Plans should meet their objectively assessed housing need in full. Paragraph 83 allows for the review of Green Belt boundaries under exceptional circumstances through the preparation of the Local Plan. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The SHLAA has assessed both green field sites and brown field sites across the district. There are not enough developable brown field sites to avoid some development in green field and green belt sites. More specific policies and land allocations, detailing the exact releases in Bingley will be contained in the Allocations DPD.	
AD1 (B) Cottingley	(ID) 8. Land should not be taken out of the green belt as it checks unrestricted sprawl, prevents neighbouring towns from merging into one another, and assists in safeguarding the countryside from encroachment.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District, as the NPPF recognises the Green Belt as a means of meeting unmet need under exceptional circumstances. The Policy specifically requires any review to consider the purposes of the Green Belt as set out in NPPF as well as the strategic functions of the Green Belt. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. More specific policies and land allocations, detailing any releases for Cottingley, following the approach outlined in Policy HO7, will be contained in the Allocations DPD.	82
AD1 (B)	(ID) 9. Proposed sites within Cottingley are not	There are no proposals for sites in this Strategic	82

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Cottingley	natural infill.	Document.	
AD1 (B) Cottingley	(ID) 10. Agricultural land that would be lost is used for grazing and to provide feed for livestock. It has been used for crop farming. Will be needed to provide locally sourced food.	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>The National Planning Policy Framework, (NPPF) in section 11 para: 112, states that Local Planning Authorities (LPA) should take into account the economic and other benefits of the best and most versatile agricultural land.</p> <p>The NPPF refers to high quality agricultural land. In the Bradford district we do not have any Grade 1 or 2 agricultural land. The highest quality in Bradford is grade 3.</p> <p>Strategic Objective 16 seeks to safeguard and enhance agriculture as a natural resource.</p> <p>The SHLAA has assessed both green field sites and brown field sites across the district. There simply are not enough developable brownfield sites to avoid some development in greenfield and Green Belt sites. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan.</p> <p>HO7 lists a range of principles to be used when identifying, assessing, comparing and allocating sites for housing development.</p> <p>The NPPF, Strategic Objective 16 and policy HO7 will be used to identify, assess and compare sites for development in the Allocations DPD.</p>	82
AD1 Keighley	(ID) 11. Sustainable urban extensions into the green belt around Keighley will be required to meet the housing requirement	<p>The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030.</p> <p>Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District. The strategic policies driving</p>	447

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		the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. More specific policies and land allocations, detailing the exact releases for Keighley will be contained in the Allocations DPD. Policy AD1 reflects the above sections and is considered to be sound as drafted.	
AD1 (A) Steeton with Eastburn	(ID) 12. Support the acknowledgement that some local green belt changes in sustainable locations will be required to deliver new homes	Noted	396, 447
AD1	Issue E (IE) Economic development		
AD1	(IE) 1. The potential for further economic development in Airedale is considerable given the level of transformation already achieved by the Airedale Master Plan proposals. New housing constitutes essential infrastructure to support this economic growth	Noted	447
AD1 (A) East Morton	(IE) 2. The reference to employment land should be qualified as being indicative or minimum figures.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD. The area of land allocations has to be precise and cannot be indicative or a minimum area.	512
AD1 (B) Keighley	(IE) 3. Support for the comprehensive regeneration in central Keighley	Noted	447
AD1 (C) Silsden	(IE) 4. Does not identify the location of the 'Silsden Rural Business Park'	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. Silsden Business Park is shown indicatively in Figure AD1. More specific policies and land allocations will be	68

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		contained in the Allocations DPD. The current drafting of the policy, without identifying the specific location of the business park, does not make the Plan unsound.	
AD1 (C) Silsden	(IE) 5. There should be no reduction or reclassification of employment allocations.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. The level of development proposed is explained and justified here and in the Background Papers on Economy and Jobs. More specific policies and land allocations will be contained in the Allocations DPD.	68
AD1	Issue F (IF) Transport		
AD1 (E8)	(IF) 1. Support for the policy	Noted	487
AD1 (A) Baildon	(IF) 3. Traffic levels are problematic now, without the addition of more houses	Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development. The Council has confidence that future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.	102, 208, 209, 339, 340, 366, 399
AD1 (B) Silsden	(IF) 4. Does not identify the 'supporting highway infrastructure' or how it will be provided	Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development. The Council has confidence that future capacity issues	68

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		arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.	
AD1 (B) Silsden	(IF) 5. Silsden’s growing population requires additional railway station parking	Parking provision at railway stations will be the subject of ongoing review by WYCA and Bradford Council. Increased Rail Park and Ride provision is planned for Silsden and Steeton Railway Station	68
AD1 (E) Silsden	(IF) 6. Object to the requirement that a bypass for Silsden is required to accommodate a 1000 new homes	The point made by the objector is inaccurate in that Policy AD1 E 4 actually refers to “any significant highway infrastructure required to facilitate development to the East of Silsden”. Under the provisions of Policy HO2, proposals for the development of the growth area of Silsden will be delivered through the production of the Allocations DPD.	435
AD1 (E) Silsden	(IF) 7. No mention is made of how the enhanced pedestrian/cycle links to Silsden and Steeton Railway Station would safely cross the A650	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The enhanced facilities are promoted by the Local Infrastructure Plan. It is not appropriate to describe scheme details in the Core Strategy, which is a strategic document.	68
AD1 (E) Silsden	(IF) 8. No mention is made of how the transport improvements will be funded	Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development. The Council has confidence that future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.	68
AD1 (E) Silsden	(IF) 9. No mention is made of how the public transport links are to be approved	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.	68

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		Improvements to public transport will be identified and developed through working with operators and the West Yorkshire Combined Authority. It is not appropriate to describe scheme details in the Core Strategy, which is a strategic document.	
AD1 (B) Silsden	(IF) 10. Growth at Silsden is supported together with local infrastructure to enhance sustainable transport connectivity	Support noted.	447
AD1	Issue G (IG) Human Rights Act		
AD1 (A) Baildon	(IG) 1. The plan denies people their human rights by wilfully destroying countryside and by over developing existing communities	The Council has a statutory duty to prepare the Core Strategy and other development plan documents which will be reviewed by an independent inspector. To accord with that duty these documents must provide for new homes and other development to meet the needs of the district. The Council accepts that in preparing these documents it must act in a way which is not incompatible with Convention (i.e. human) rights including those in article 8 and article 1 of the First Protocol. This requires striking a fair balance between making provision for additional residential and other development to meet the needs of the District without having an excessive or disproportionate effect on the interests and human rights of individual persons. The Core Strategy provides for additional development whilst maintaining green belt and other safeguards necessary so that everyone can enjoy a well-regulated environment. Inevitably this involves the development of land which has not been developed before, as well as brownfield sites, but this will not have the effect of depriving anyone of access to the countryside or of leading to excessive additional congestion. The proposals in the Core Strategy will not	393

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		therefore have an excessive or disproportionate effect on any individual persons. The Council considers that it achieves the right balance and does not accept that the Core Strategy is in breach of anyone's human rights, let alone that it is acting oppressively towards any individual residents in Baildon or elsewhere.	
AD2	Airedale Sub Area		
AD2 Silsden	1. Support the requirement for more investment in the Local Growth Centre of Silsden. The delivery of new homes will help meet this aim.	Noted	517
AD2 Silsden	2. Suggested policy amendment to include the role safeguarded land can play	Noted	517
AD2 Silsden	3. Object to any deletions from the green belt	Noted	68
AD2 Silsden	4. Support for the release of green belt sites is sustainable locations	Noted	517
AD2 Steeton with Eastburn	5. Support the acknowledgement that some local green belt changes in sustainable locations will be required to deliver new homes	Noted	396, 447
AD2 (B)	6. Welcome the intention to target public and private sector investment to support the regeneration of Keighley and Bingley town centres and to deliver enhancements to their public realm.	Noted	103
AD2	7. As part of targeted private sector investment reference should also be made to the intention to support initiatives which would promote and improve the linkages and connectivity of heritage tourist assets along the Airedale corridor. Suggested policy amendment Airedale Sub Area Policy AD2 add the following additional Criterion:- "To deliver measures which would help to	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. Connectivity is considered under section AD1 (E) on Transport and E3 looks to improve links between villages in Airedale. The Council considers that the policy as drafted is sound. The proposed change would add unnecessary duplication	103

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	promote and improve connectivity and linkages between Haworth and the other heritage assets along the Airedale corridor”.		
AD2	No reference to the capacity issues within the Aire Valley Trunk Sewer	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>The LIP acknowledges that there are some capacity issues related to water treatment and the capacity of the Aire Valley Trunk Sewer. Yorkshire Water is aware of Bradford’s planned housing and employment growth and this will be factored into their investment plans.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	493

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Section 4- Sub Area Policies – 4.3 Wharfedale**

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue)</i>	Council's Response	Respondent
Section 4.3	Wharfedale Sub-Area		
WD1	Issue A (IA) - Apportionment & distribution		
WD1 (A)	(IA) 1. In context of Policy HO3, housing need should be higher in Wharfedale	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The strategic policies driving the housing quantum and distribution are contained in section 5.3 of the plan and are further explained within the Housing Background Paper. Sustainability and factors such as the availability of developable land supply, transport connectivity and access to jobs and services as well as environmental factors have been taken into consideration in determining the spatial strategy for Wharfedale. More specific policies and land allocations, detailing development in Wharfedale will be contained in the Allocations DPD.	437, 495
WD1 (A)	(IA) 1a. Objection to the reduction of housing distribution in Burley-in-Wharfedale	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policy setting out the housing distribution is set out in Section 5.3 of the Plan and more specifically in Policy HO3. The justification for the adjustment to the housing target for Burley-in Wharfedale is outlined within Background Paper 2: Housing (Part 1) paragraphs 5.13 – 5.17. A further response to this issue is contained within the housing section of the summary of responses to the Publication Draft representations.	397, 400, 402
WD1 (A & B)	(IA) 2. The proposed scale of development in Wharfedale is too high and contradicts the	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030.	74, 87, 116, 148, 159,

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	aims of WD1/E1	<p>Housing quantum are determined and explained under Policy HO3 and within the Housing Background Paper.</p> <p>WD1 E's aims are that any development that will have taken place will have been as travel reduction friendly as possible. The policies reiterate the level of development that arises from implementation of the strategic spatial policies in sections 5.1, 5.2 and 5.3 and describes the manner in which the spatial strategy will have been fulfilled by the end of the plan period. The sub area policy is advocating the manner in which the proposed scale will be implemented. The manner being as sustainable and modal shift friendly as possible. The specific policies detailing the exact allocation of land will be contained in the Allocations DPD and policy HO7 provides the context.</p>	223, 305, 306
WD1 (A)	(IA) 2a. Reduce the broad housing distribution (from 1600 to 1550)	<p>The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The strategic policies driving the housing quantum and distribution are contained in section 5.3 of the plan. The current drafting of Policy WD1 (A) reflects HO1 and HO3 with a strategic pattern of development of 1600 residential units in Wharfedale.</p>	404, 406
WD1	(IA) 2b. The scale of development in Ilkley conflicts with the aims of this policy and the Landscape Character SPD	<p>The Sub Area policies are the place specific spatial visions of where the District should be by 2030. The Council does not agree that there is any such conflict. The Core Strategy seeks to balance the need for growth whilst safeguarding the unique landscape character of the District. NPPF (para 113) supports a criteria based policy approach through which proposals will be judged. Policy EN4 (Landscape) sets out this criteria based approach which is supported by further policies, namely SC6 (Green Infrastructure) and DS2 (Working with the</p>	180, 218

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		Landscape), along with the Landscape Character SPD which provides further criteria based guidance. The drafting of Policy reflects the aims of policies EN4, SC6 and DS2.	
WD1 (A)	(IA) 3. Lack of specific evidence detailing how the targets have been formulated and calculated. No compelling evidence relating to the likely population increase of Ilkley over the life of the plan. The imposition of 800, is a top down approach contrary to Localism and NPPF para 50.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The strategic policies driving the Strategic pattern of development including the housing quantum and distribution are contained in section 5.3 of the plan. Further detail is contained in the Housing Background Paper. Policy SC4 identifies Ilkley as a Principal Town and the scale and nature of development envisaged for the hierarchy of settlements which concentrates planned growth in the Regional City and then the Principal towns. Provision to meet the objectively assessed need as outlined in Policy HO1, accords with NPPF paras 47 and 50 and is not considered to be contrary to Localism as it remains the function of Local Plans to determine the level and distribution of growth.	116, 170
WD1 (B)	(IA) 4. Policy WD1 in relation to Addingham should be amended to state that:- “In Addingham, new housing provision will be determined following a detailed assessment of local housing need and be met through small-scale, organic development identified via local consultation and the preparation of a neighbourhood plan.”	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. As of October 2014, the Council has not received an application to designate Addingham as a Neighbourhood Area for the purpose of producing a Neighbourhood Development Plan.	111
WD1 (B)	(IA) 5. The 400 requirement for Menston cannot be met by extant permission and Bingley Road and Derry Hill, as suspect only potential 30 units within the existing settlement boundary. Questions relating to take up of	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The strategic policy setting out the housing distribution is set out in Section 5.3 of the Plan and more specifically in Policy HO3. The Strategic Housing Land Availability	135, 342, 350

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	permissions	Assessment (2013) provides the evidence to support the apportionment, more specifically Appendix 2L: Menston. If needed, a land supply exists well in excess of the proposed target for 400 new homes.	
WD1 (A & B)	(IA) 6. The scale of development proposed for Wharfedale is in direct contradiction of Policies TR1 and TR2	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The Council disagrees with the assertion made by the objector. The Council is required to plan for growth within the context of sustainability. Policies TR1 and TR2 provide the framework for sustainable travel within the context of growth. The drafting of this policy reflects policies HO3, TR1 and TR2.	116
WD1 (A)	(IA) 7. The focus on development in Airedale and Wharfedale could serve merely to meet housing demand in Leeds and North Yorkshire rather than Bradford.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The Council disagrees with the assertion made by the objector. The objector provides no evidence to substantiate this view. The SHMA has indicated that Wharfedale and Airedale lie within an overall Bradford market area and that there is a need for affordable homes across the district and not just in the Regional City. The strategic policies driving housing distribution is set out in Policy HO3. There will always be a degree of movement across local authority boundaries and 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 North Yorkshire which could be bought by people from Bradford who cannot remain there due to the lack of provision of new homes in the area.	157
WD1 (A)	(IA) 8. Proposed housing development in Airedale and Wharfedale will not satisfy demand in Bradford District, namely for	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The SHMA has indicated that Wharfedale and Airedale lie	361

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	affordable housing.	within an overall Bradford market area and that there is a need for affordable homes across the district and not just in the Regional City. The strategic policy which sets out the Council's approach to the provision of affordable housing is set out in Policy HO11. This policy seeks to achieve an appropriate balance of setting affordable housing requirements at a level which will help meet the overall need for affordable housing across the district, while taking into account economic viability, affordability and overall housing distribution. The Council therefore considers the targets in policy HO11 as referred to in Policy AD1 (A) to be justified and in conformity to the NPPF para 47, 50 and 173-174.	
WD1 (A)	(IA) 9. Proposed housing development in Airedale and Wharfedale will not assist regeneration of the City Centre.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The overall strategy of the Plan is to plan for growth across all areas of the District over the Plan period, irrespective of regeneration efforts in the City Centre. The regeneration of the City Centre will be the subject of a Bradford City Centre Area Action Plan. The Council considers the current drafting of this policy to be sound.	361
WD1	Issue B (IB) - Economic Development		
WD1 (C)	(IB) 1. Ilkley is a commuter settlement, not a place for significant employment	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD. Ilkley is a Principal Town and Policy SC4 identifies the scale and nature of the development envisaged for the hierarchy of settlements.	74, 116, 301, 302, 303, 318, 333, 337, 342, 360, 362, 364, 368, 375, 403
WD1 (A & B)	(IB) 1a. Although the Core Strategy does not allocate land for specific uses, it is worth noting in respect of the proposal for 5 hectares of	The Council disagrees. The proposals form part of a balanced and therefore sustainable package of housing, employment and service provision which in combination	116

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	employment land in Ilkley that the Inspector at the UDP concluded that commercial development, “would be very much out of keeping with the present appearance,” of “the Jewel in Bradford’s Crown.”	will enhance the vitality of the town.	
WD1 (A)	(IB) 2. 5 Ha of employment land allocated in Wharfedale yet supply of employment sites in Ilkley exceeds demand, empty units	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD. Ilkley is a Principal Town and Policy SC4 identifies the scale and nature of the development envisaged for the hierarchy of settlements.	170
WD1 (C)	(IB) 3. There is no / lack of employment opportunities in Ilkley to support the proposed number of new homes	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. To suggest that there are no employment opportunities in Ilkley, given its size and role as a service and tourist centre is clearly wrong. It is also unclear as to whether the objectors are arguing that there should be a much greater employment land allocation within and adjoining the town. Moreover the town has good road and public transport links to a range of locations which offer further employment opportunities. The Core Strategy proposes an allocation of 5 hectares of employment land in Wharfedale, which will provide further employment opportunities during the plan period. It will provide a source of employment opportunities for local residents thus reducing the need to commute.	310, 337, 383, 398, 403, 410, 418, 441
WD1 (C1)	(IB) 4. The impact of 800 homes does not sustainably support Ilkley’s tourism and leisure interests	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The Council disagrees with what is a strange and unsubstantiated claim. The strategic policies driving	10, 18, 19, 20, 21, 30, 31, 32, 48, 70, 71, 74,

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		economic development are contained in Section 5.1 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD. Ilkley is a Principal Town and Policy SC4 identifies the scale and nature of the development envisaged for the hierarchy of settlements.	87, 122, 125, 131, 133, 155, 223, 230, 304, 315, 323, 324, 325, 327, 352, 358, 363, 375, 385, 401, 403, 426, 449, 450, 465, 473,
WD1 (C1)	(IB) 5. A65 congestion - Not clear what measures are being encouraged to increase tourism/visitor numbers	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. There is a very strong emphasis in TR4 on ensuring that new and improved tourist attractions and facilities can be accessed by sustainable transport modes. As one example the proposed Wharfedale cycle route will provide an attractive route between towns and villages in the valley linked to rail stations. Tourism related trips are generally made outside peak periods and so impact on congestion on A65 from any additional car trips will be limited	7, 10, 30, 31, 32, 48, 93, 155, 255, 302, 346, 358
WD1 (C2)	(IB) 6. There is not “excellent rail and road connectivity” Where is the supporting evidence that this will come about?	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to	74, 88, 135, 170, 177, 179, 184, 411, 472

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		<p>2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p>	
WD1 (C2)	(IB) 7. This ignores the heavily congested line to Leeds and the almost gridlocked A65 into Leeds and the A6038 into Bradford together with poor links to the motorways.	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus</p>	135

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		Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.	
WD1 (C2)	(IB) 8. Especially at weekends with main link to the dales	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>The Council has confidence that any future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>Policy TR4 of the Plan combined with policies on modal shift, public transport and active travel aim to increase visitor numbers in a sustainable manner.</p> <p>Further work will be undertaken as part of the more detailed site allocations work to determine more local improvements and mitigation.</p>	135
WD1 (A, C2 & C4)	(IB) 9. Poor transport system discourages real growth in new employment in lower Wharfedale	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan</p>	74, 342

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		Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.	
WD1 (C4)	(IB) 10. This paragraph refers to the creation of high quality land for employment at Ilkley but gives no suggestions as to where such land could be located	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD.	47,
WD1 (C4)	(IB) 11. The obvious employment requirement is not available and there is little room to develop such employment infrastructure.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD. Ilkley is a Principal Town and Policy SC4 identifies the scale and nature of the development envisaged for the hierarchy of settlements.	178
WD1	(IB) 12. Industry and commerce will not locate in Wharfedale due to limitations of topography and poor access to motorway networks	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic development are contained in Section 5.1 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD.	25, 74, 88, 342
WD1 (B1)	Proposed housing developments in Airedale and Wharfedale will not assist the regeneration of the City Centre	The Sub Area policies the place specific spatial vision of where the District should be by 2030. Policy HO11 seeks to achieve an appropriate balance of setting affordable	361

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		housing requirements at a level which will help meet the overall need for affordable housing across the district, while taking into account economic viability, affordability and overall housing distribution. Policy AD1 reflects policy HO11 and in conformity to the NPPF para 47, 50 and 173-174.	
WD1	Issue C (IC) - General Infrastructure		
WD1	(IC) 1. Support development, but it should be done carefully to ensure existing facilities are not compromised	Noted	312
WD1 (A & B)	(IC) 2. The existing infrastructure cannot support the scale of development and where will additional infrastructure go?	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	63, 70, 71 73, 74, 88, 91, 96, 111, 119, 120, 125, 143, 163, 170, 180, 183, 211, 220, 221, 224, 227, 229, 236, 237, 240, 241, 244, 246, 247, 248, 249, 251, 263, 273, 275, 280, 282, 283, 284, 287, 291, 292, 293, 297, 363
WD1 (B)	(IC) 3. With regard to 200 units in Addingham and associated community facilities, what are	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.	179

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	these facilities and how will they be financed?	<p>New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. The infrastructure assessment for Wharfedale is contained in section 5.5 of the LIP.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	
WD1 (A & B)	(IC) 4. There is no corresponding infrastructure planned to deal with the consequences for extensive new housing developments	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	74, 118, 120, 133, 135, 139, 140, 142, 148, 149, 150, 151, 170, 171, 177, 178, 179, 180, 183, 211, 225, 252, 277, 292, 304, 309, 314, 318, 319, 321, 322, 326, 328, 329, 332,

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			335, 336, 337, 341, 342, 348, 351, 361, 362, 365, 367, 369, 370, 377, 378, 381, 382, 383, 403, 408, 452, 454, 464, 467, 469, 470, 471, 474, 477, 478, 480, 453, 459, 460, 464, 471, 474, 478
WD1 (A & B)	(IC) 5. Unless the Plan proposes programmed and funded infrastructure improvements, particularly transport and education, to be delivered in line with new housing, development levels in the outer parts of the District such as Wharfedale should be scaled back considerably.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan	111

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		Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	
WD1	(IC) 6. Vague and lacking in indicators and targets, only “a vague and imprecise statement of anticipated outcomes” Lacks opportunity for monitoring infrastructure improvements are a wish list only without clarity on how to deliver required infrastructure	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), set out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. The thematic policies of the plan note their relevant outcomes, indicators and targets, together with the lead roles and mechanisms of delivery. The key plan indicators are noted in Section 7, Monitoring. The text preceding Policies ID4 and ID5 notes that the IDS will be monitored as part of the Annual Monitoring Report process.	135
WD1 (A & B)	(IC) 7. Scale of development together with that in Aireborough and combined pressure on infrastructure fails Duty to Cooperate, conflicts with strategy for tourism in Wharfe valley and SC3 and NPPF 52/54	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The Council recognises the various strategic issues and relationships with adjoining local authority areas and their respective Local plans. The Duty to Cooperate background paper sets out the work to date to understand these issues and how key bodies have been engaged in the preparation of the plan including how this has informed the content and	116, 70, 71

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		<p>approach.</p> <p>The Council is committed ongoing work with adjoining LPAs and bodies through the implementation of the Local plan and also the preparation of the other DPDs which will make up the Local Plan.</p>	
WD1 (A)	<p>(IC) 8. Shipley Parliamentary Constituency settlements do not have the infrastructure to support the apportionment; Stretched resources Congestion</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030, this include the Shipley Parliamentary Constituency Settlements. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p>	361
WD1	Issue D (ID) - Infrastructure – Social		
WD1 (B)	<p>(ID) 1. Ilkley's and (Wharfedale's) primary & secondary schools are over-subscribed – no future schools planned</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure</p>	2, 3, 6, 7, 8, 9, 10, 11, 12, 15, 16, 17,

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		<p>and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. The findings from the LIP indicate that the issue in relation to school places and investment for physical improvements to existing schools are apparent across all parts of the district. Recent funding problems linked to the loss of Building Schools for the Future, compounded by major population growth (especially in the under 11 profile) means that there are a number of uncertainties surrounding whether or not the district can continue to provide a sustainable, high quality education service, across all parts of the district. Ensuring sufficient capacity will be one of the principal challenges for the district over the next 10 years.</p> <p>The Council's Children's Services have also produced an Education Organisation Plan (EOP), which considers the educational needs in Wharfedale in more detail. The outputs of the EOP have informed the LIP and will continue to inform the update or revision to the LIP. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	<p>18, 19, 20, 21, 22, 23, 24, 27, 30, 31, 32, 35, 38, 39, 41, 46, 48,50, 52, ,57, 59, 61,63, 67, 72, 73, 74, 87, 92, 93, 96, 97, 104, 107, 110, 111, 116, 119, 120, 121, 122, 125, 131, 133, 137, 138, 139, 141, 142, 143, 145, 146, 147, 149, 150, 151, 153, 154, 155, 158, 163, 169, 170, 171, 177, 178, 180, 183, 184, 189, 198, 199, 204, 205, 211, 217, 218, 220,</p>
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			221, 222, 223, 224, 225, 227, 230, 131, 233, 234, 236, 237, 238, 241, 242, 243, 245, 246, 247, 248, 249, 250, 251, 252, 254, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 270, 271, 272, 273, 274, 275, 276, 277, 280, 281, 282, 283, 284, 285, 286, 288, 289, 290, 292, 294, 295, 296, 298, 299, 300, 304, 305, 306, 307,
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			309, 310, 311, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 329, 330, 332, 334, 337, 343, 344, 348, 351, 357, 358, 359, 360, 362, 363, 365, 368, 369, 370, 372, 377, 378, 381, 383, 384, 395, 398, 403, 404, 405, 410, 418, 425, 426, 437, 443, 449, 450, 452, 453, 454, 459, 460, 465, 467, 469, 470, 471, 473,
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			474, 477, 478, 480, 500, 501, 506, 516, 518, 522
WD1 B	(ID) 1a. Addingham Primary School is full to capacity	Response as above	50, 52, 132, 175, 184, 213
WD1 B	(ID) 1b. It is evident that Ilkley Grammar School cannot accommodate the children currently in our primary system and will certainly not be able to take any new children. Our current site is physically constrained and cannot be developed any further.	Response as above	121
WD1 (B)	(ID) 1c. The need for school children to travel further afield or even outside the district is unsustainable and will worsen traffic and congestion issues	Response as above	10, 30, 31, 32, 41, 46, 61, 73, 74, 104, 107, 116 120, 131, 141, 155, 158, 170, 171, 177, 183, 189, 204, 217, 218, 243, 248, 252, 273, 283, 360, 365, 377, 378, 405, 465
WD1 (B)	(ID) 1d. Lack of nursery / pre-school provision	Response as above	234, 237, 305, 306
WD1 (B)	(ID) 1e. No Tertiary education establishments in Ilkley	Response as above	119, 133, 357, 360

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WD1 (B)	(ID) 1f. Former Ben Rhydding school expansion site now potential site for new housing	Response as above	32, 41, 46, 47, 48, 67, 72, 74, 93, 131, 137, 155, 158
WD1 (B)	(ID) 2. Medical and dental facilities over stretched	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	2, 3, 6, 12, 24, 27, 32, 38, 39, 41, 46, 57, 61, 63, 67, 74, 92, 115, 125, 133, 141, 149, 150, 163, 170, 171, 177, 178, 180, 183, 184, 198, 199, 220, 221, 222, 223, 224, 225, 229, 230, 231, 234, 236, 237, 238, 241, 245, 247, 250, 252, 254, 257, 258, 259, 260, 261, 262, 270, 273, 276, 277, 280,

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			283, 284, 285, 289, 297, 303, 313, 314, 317, 318, 319, 326, 330, 343, 360, 362, 363, 410, 426, 449, 450, 459, 460, 467, 469, 470, 471, 473, 477, 480, 506, 516
WD1 (B)	(ID) 3. There are no medical emergency facilities	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	48, 74, 119, 170, 183, 303, 319, 337, 352, 360, 362, 364, 369, 377, 405, 449, 450, 453, 459, 460, 471, 472, 501, 518
WD1 (B)	(ID) 4. Other Council facilities (e.g. libraries,	The Sub Area Policies are the place specific spatial	27, 60, 74,

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	sport and leisure) will be overstretched	visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	120, 163, 178, 220, 227, 240, 285, 346, 352, 364, 411, 426, 471, 472, 477, 480, 518
WD1	Issue E (IE) - Green Belt		
WD1 (B)	(IE) 1. Support local green belt changes in Wharfedale	Support Noted	447
WD1 (B)	(IE) 1a. Support local Green belt changes in Burley-in-Wharfedale	Support Noted	495
WD1 (B)	(IE) 2. There should be no Green Belt changes in Wharfedale	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. As evidenced by the SHLAA, the full housing requirement for the plan period cannot be met without the use of land currently designated as Green Belt. More specific policies and land allocations for Wharfedale, adopting the approach outlined in Policy HO7, will be contained in the Allocations DPD.	60, 159, 180, 381, 437, 506

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WD1 (B)	(IE) 3. Building housing on Greenbelt outside the current boundary of Ilkley is unsustainable as it will be too far to walk or cycle into the centre	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The Council disagrees and considers that there are a number of locations on the edge of the town which would be sustainable options for growth. The SHLAA has evidenced that greenfield and Green Belt sites outside existing settlement boundaries will have to be considered across the District, not just in Ilkley. Policies SC5 and HO7 identify an approach to site allocation that is as sustainable as possible. More specific policies and land allocations, detailing the exact releases in Ilkley will be contained in the Allocations DPD.	2
WD1 (B)	(IE) 4. Impossible to assess from the policies which areas of Greenfield and Greenbelt land in each sub-area will be affected by the policies. Without this connection it is difficult to assess the degree to which policies have been positively prepared in pursuit of sustainable development	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Based on the most up to date evidence the objectively assessed need cannot be met without the need for significant release of land from the current Green Belt under NPPF exceptional circumstances and the use of green field sites. Policy SC7 identifies the approach to Green Belt releases that will be required to deliver longer term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. The Strategy to direct the Majority of growth to the Regional City, then Principle Towns and growth areas is contained in Policy SC4. The Core Strategy is supported by the Growth Study which looked at the land around all settlements with regard to the role and function of the Green Belt at a broad level and did not indicate any significant issues for delivering the strategy. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD, Policy	394

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		HO7 aims to direct development that is as sustainable as possible.	
WD1 (B)	(IE) 5. The exceptional circumstances for development in the green belt have not been met.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District. The Housing Requirement for the plan period cannot be met in full without the use of land currently designated as Green Belt. Paragraph 47 and 83 of the NPPF require the need to be met in full and allow for Green Belt reviews as part of the Local Plan making process under exceptional circumstances. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD. Policy WD1 B reflects SC7 and the strategic policies that drive the pattern of development in sections 5.1 and 5.3.	361
WD1	Issue F (IF) - Environment & Character		
WD1 (D)	(IF) 1. Support for this Environment section	Noted	50, 52
WD1 (D1)	(IF) 1a. Support for the recognition of significance of the archaeology of Rombalds Moor and the contribution which this area makes to the setting and visitor appeal of Ilkley	Noted	103
WD1 (D1 & D4)	(IF) 2. First words should be “Protect and enhance” rather than recognise	The policy wording is considered sound as drafted.	170
WD1 (D)	(IF) 3. There has been no / little account taken for the impact on heritage assets (no mention of Roman fort and the Manor House Museum in Ilkley)	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. Referring to specific areas would provide additional clarity but the policy as drafted is not unsound.	74, 122, 367, 370, 464, 516
WD1 (D2)	(IF) 4. Has BMDC consulted with North Yorkshire County Council, what is the impact of their Core Strategy document on areas of land within a specified distance of Beamsley Beacon	North Yorkshire County Council was consulted on the Core Strategy and raised no objection on environmental grounds. Potential impact of the distribution for Addingham and bio diversity and habitat is considered in	178

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	<p>and surrounding moorland? What will the impact of 200 homes in Addingham be on NYCC’s bio-diversity habitat considerations? Addingham is within two habitat areas, one of which is in North Yorkshire; given that the two areas overlap how does Bradford reconcile ANY building in this important foraging area; as any offset requires one foraging area to be replaced by another foraging area thus making offset impossible. Has BMDC complied with its duty to co-operate?</p>	<p>the HRA and for the south Pennine Moors in Policy SC8. The Strategy’s approach to conservation, biodiversity, habitats and landscape is detailed section 5.4 of the Plan. Further Representations to similar issues can be found in appendices 7C and 7K. The Council is committed to working with other bodies and LPAs as part of the duty to cooperate and more detail on this is contained on the “Duty to Cooperate Back ground Paper.</p>	
WD1 (D3)	(IF) 5. Support identification of the River Wharfe as a key green infrastructure to be protected and enhanced.	Noted	495
WD1 (D3)	(IF) 6. Prioritising Green Infrastructure would also assist the delivery of climate change adaptation, recreation and health objectives	Noted	513
WD1 (D5)	(IF) 7. Support for the intention to enhance the heritage value of the towns and villages along the Wharfedale Corridor as one of the key elements of the Spatial Vision for this part of the District	Noted	103
WD1 (D5)	<p>(IF) 7a. Whilst fully support intentions behind the criterion considered to be too generic and needs to specify which type of heritage is important Suggested amendment – “Conserve and enhance the heritage assets of the Wharfe Valley especially those elements which make a significant contribution to the distinct character of this area including the distinctive Victorian and Edwardian heritage of</p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. Referring to specific areas would provide additional clarity but the policy as drafted is not unsound. Support noted</p>	103

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	Ilkley and the prehistoric landscapes and rock art of Rombald's Moor”		
WD1 (D)	(IF) 8 Not enough consideration that Ilkley has a distinct character to the rest of the district	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. Referring to specific areas would provide additional clarity but the policy as drafted is not unsound.	10, 15, 18, 19, 20, 21, 22, 30, 31, 74, 91, 115, 155, 159, 180, 294, 295, 381, 394, 449, 450, 501, 504
WD1 (D)	(IF) 9. New policy insertion - Wharfedale railway line needs to be specifically protected from any building development activity which might compromise the track stability. Require a zone free from development to protect slope	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies on Transport and Movement are contained in Section 5.2 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD. The lack of the suggested policy does not make the Plan unsound.	159
WD1 Omission	(IF) 10. The plan conflicts with NPPF para 112 regarding high quality agricultural land	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The National Planning Policy Framework, (NPPF) in section 11 para: 112, states that Local Planning Authorities (LPA) should take into account the economic and other benefits of the best and most versatile agricultural land and that they should seek to use areas of poorer quality land in preference to that of higher quality, where significant development of agricultural land is needed. The NPPF refers to high quality agricultural land. In the Bradford district we do not have any Grade 1 or 2 agricultural land. The highest quality in Bradford is grade 3. Strategic Objective 16 seeks to safeguard and enhance	25, 97, 118, 142, 151, 333, 336, 370,

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		<p>agriculture as a natural resource. HO7 lists a range of principles to be used when identifying, assessing, comparing and allocating sites for housing development. The NPPF, Strategic Objective 16 and policy HO7 will be used to identify, assess and compare sites for development in the Allocations DPD. This NPPF policy has not been replicated but will apply to agricultural land in the Bradford District.</p>	
WD1 (D) Omission	(IF) 10a. Lacks protection of category 1>3 farmland used for cattle and sheep grazing	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>The National Planning Policy Framework, (NPPF) in section 11 para: 112, states that Local Planning Authorities (LPA) should take into account the economic and other benefits of the best and most versatile agricultural land. The NPPF refers to high quality agricultural land. In the Bradford district we do not have any Grade 1 or 2 agricultural land. The highest quality is grade 3. Strategic Objective 16 seeks to safeguard and enhance agriculture as a natural resource. HO7 lists a range of principles to be used when identifying, assessing, comparing and allocating sites for housing development. The NPPF, Strategic Objective 16 and policy HO7 will be used to identify, assess and compare sites for development in the Allocations DPD.</p>	135, 342
WD1 (D)	(IF) 11. The scale of development in Ilkley contradicts the aims of this policy and the vision and aims bring into question the conflicts between growth and environmental factors, including the loss of Green Space in	<p>The Sub Area policies are the place specific spatial visions of where the District should be by 2030. The Council does not agree with the assertion made by the objector. The Core Strategy seeks to balance the need for growth whilst safeguarding environmental factors. The</p>	74, 116, 159, 218, 222, 224, 229, 247, 249, 254, 264,

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	Wharfedale and protection of the Zone of influence of the South Pennines Moors SAC	Core Strategy's approach to Green Infrastructure as a mechanism of raising its profile across the District is detailed in Policy SC6. Other policies aiming to protect landscape in Wharfedale can be found in policies EN4, EN5, SC6 and DS2 and the Landscape Character SPD. Policy HO7 and the allocations DPD on Housing Site Allocation Principles will seek to maximise positive environmental benefits of developments during specific site allocations.	265, 282, 283, 285, 291, 305, 306, 342
WD1	Issue G (IG) - Transport issues		
WD1 (B)	(IG) 1a. This is predicated on excellent rail and road connectivity. Should be more realistic regarding employment provision in Wharfedale and Ilkley	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth	135

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		and development.	
WD1 (E)	(IG) 1b. Laudable improvements but unrealistic. The A65 and its junction with A6038 capacity issues are insurmountable. The trains to Leeds are one of the most congested in the country.	Response as above	135, 170
WD1 (A & B)	(IG) 1c. Greater congestion on commuter routes to Bradford & Leeds especially due to lack of employment in and planned for Ilkley	Response as above	35, 38, 39, 47, 48, 59, 60, 61,63, 74, 87, 92, 93, 97, 104, 107, 115, 116, 125 , 133, 140, 143, 148, 149, 151, 153, 154, 155, 158, 163, 170, 171, 178, 180, 183, 197, 204, 218, 224, 257, 258, 259, 260, 261, 262, 268, 272, 287, 297, 299, 300, 304, 315, 320, 323, 324, 333, 334, 335, 348, 349, 357,

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			358, 363, 384, 385, 395, 398, 403, 411, 418, 426, 478, 501, 516
WD1 (B)	(IG) 1d. Addingham village streets are congested and parking and other facilities are under too much pressure	Response as above	175, 213, 464
WD1 (A & B)	(IG) 2. The building of 1,600 houses in Wharfedale, conflicts with the NPPF, as it is bound to result in a significant increase in traffic and fail to reduce greenhouse gas emissions.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The Council disagrees with the assertion made by the objector. Given the level of population growth projected within the district and the number of new homes which will have to be accommodated it is inevitable that there will be some increase in traffic. However the plan, by its approach to housing distribution, its concentration on development within the main urban areas and also in its transport policies which seek to encourage modal shift provide the most sustainable option for accommodating this growth. The strategic policies that address this matter are contained in Section 3, particularly Policy SC2 B; Section 5.2, particularly Policy TR1; and Section 5.4, particularly Policy EN8. The Plan has been produced in compliance with NPPF.	48, 63, 116, 118, 138, 143, 441
WD1 (E)	(IG) 3. Regardless of quality and connectivity, the cost of public transport from Ilkley to Bradford could be prohibitive	Rail is the dominant public transport mode between Wharfedale and Bradford. The Council does not have any influence on rail costs (which are generally lower in West Yorkshire than in most parts of the country) and it is not considered that they are an issue for, or can be addressed in, the Core Strategy.	133
WD1 (E)	(IG) 4. There is no guarantee that any	The Sub Area Policies are the place specific spatial	60

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	investment and improvements to infrastructure will be forthcoming	visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.	
WD1 (E)	(IG) 4a. How is BMDC going to ensure that improvements are achievable? Who is going to pay for the required improvements? How can BMDC justify improvements in bus services when in reality the level of bus services is declining?	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.	179

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		<p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p>	
WD1 (E2)	(IG) 5. Support for this policy section	Noted	337
WD1 (E2)	(IG) 5a. Include Addingham to Ilkley cycle route & to Bolton Abbey	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies on Transport and Movement are contained in Section 5.2 of the Plan. More specific policies and land allocations will be contained in the Allocations DPD.</p> <p>The lack of the suggested policy does not make the Plan unsound.</p>	337
WD1 (E)	(IG) 5b. Aims here are contrary to the LIP	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate</p>	87, 341, 349, 449, 450

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		infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted. Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.	
WD1 (E5)	(IG) 6. LBIA supports opportunity to improve connections between settlements within the City Region	Noted	487
WD1	Issue H (IH) - Outcomes by 2030		
WD1 / Para 4.3.2	(IH) 1. Flawed future vision for Ilkley, it foresees changes to infrastructure which are not achievable by Bradford Council. There is no point in having a vision which cannot be delivered. The future vision in the WD policies should be re drafted more realistically with targets that are achievable by BMDC or to which its partner organisations are prepared to sign up and deliver	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	159
WD1 / Para 4.3.2	(IH) 2. Information relating to a new school already built is blatantly wrong	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.	372

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		<p>New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>The findings from the LIP indicate that the issue in relation to school places and investment for physical improvements to existing schools are apparent across all parts of the district. Recent funding problems linked to the loss of Building Schools for the Future, compounded by major population growth (especially in the under 11 profile) means that there are a number of uncertainties surrounding whether or not the district can continue to provide a sustainable, high quality education service, across all parts of the district. Ensuring sufficient capacity will be one of the principal challenges for the district over the next 10 years.</p> <p>The Council's Children's Services have also produced an Education Organisation Plan (EOP), which considers the educational needs in Wharfedale in more detail. The outputs of the EOP have informed the LIP and will continue to inform the update or revision to the LIP. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	
WD1 / Para 4.3.2	(IH) 2a. Vision for Ilkley for 2030 assumes a new secondary school has been built but no	The Allocations DPD will look at site allocations for uses other than Housing. The site IL014 is a SHLAA site but	121

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	land has been allocated for this in the Plan. It is strongly urged that provision is made for a new secondary school to serve the Wharfe valley by designating all or part of site IL014 for educational use.	not an allocation for housing. As a strategic document, It is not the not the purpose of the Core Strategy to allocate land either for housing or other uses.	
WD1 / Para 4.3.2 and 4.3.3	(IH) 3. Anomaly - high quality homes in Ilkley but only good quality homes in the rest of Wharfedale	The lower case text was not drafted to be deliberately contradictory but, in itself, does not make the plan unsound. The approach to housing quality and Mix, contained within Policies HO8 and HO9, will be applied equally throughout Wharfedale and the District.	135
WD1 / Para 4.3.2	(IH) 4. The excellent bus link to Bradford from Ilkley claimed in the Core Strategy does not exist; the direct service was withdrawn in 2010.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The Council will closely work with WYCA to facilitate the Modal Shift in accordance with Policy TR1 of the Plan.	116
WD1 / Para 4.3.4	(IH) 5. Support for this Addingham outcome	Noted	111
WD1 / Para 4.3.4	(IH) 6. Reference is made again to “local need” with no reference made to how BMDC have calculated what this local need is.	The reference made in the text is a descriptive term to distinguish between areas proposed for significant development and growth and areas where much smaller scale development is proposed. It is not referring to a calculation. The plan’s approach is to determine the district wide need for new homes and then to distribute that growth according to a range of criteria.	179
WD1	(IH) 7. There is no indication or targets for the spatial vision statement is vague and imprecise – no monitoring targets	These policies do not have monitoring targets as they are policies indicating the place spatial visions of where the District should be by 2030. The sub area policies for Wharfedale reflect Strategic Core Policies and thematic policies and their outcome, indicator and targets monitoring suite.	342
Section 4	Wharfedale Sub Area		
WD2	(IA) 1. Support for this policy	Noted	447
WD2	(IB) Infrastructure		
WD2 (C)	(IB) 1a. Clarification needed in policy content	The Sub Area Policies are the place specific spatial	179, 342, 447

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	on how, when, and where infrastructure improvements will be provided	visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	
WD2	(IB) 1b. A lack of robust commitment to necessary local infrastructure delivery	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	74, 179
WD2	(IB) 1c. No investment in secondary schools in the valley, although the need is recognised.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.	135

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	<p>Menston secondary school pupils would still be category 2 for any new school in Ilkley. Leaving Guiseley which will under more immense pressure from dev in Aireborough and at High Royds.</p> <p>St Mary's in Menston has no space for children of other faiths and Prince Henry's is Academy which is also oversubscribed</p>	<p>New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>The findings from the LIP indicate that the issue in relation to school places and investment for physical improvements to existing schools are apparent across all parts of the district. Recent funding problems linked to the loss of Building Schools for the Future, compounded by major population growth (especially in the under 11 profile) means that there are a number of uncertainties surrounding whether or not the district can continue to provide a sustainable, high quality education service, across all parts of the district. Ensuring sufficient capacity will be one of the principal challenges for the district over the next 10 years.</p> <p>The Council's Children's Services have also produced an Education Organisation Plan (EOP), which considers the educational needs in Wharfedale in more detail. The outputs of the EOP have informed the LIP and will continue to inform the update or revision to the LIP. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	
WD2	(IB) 1d. No development should take place until it is confirmed that the necessary educational	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.	342

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	<p>facilities are available locally.</p>	<p>New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>The findings from the LIP indicate that the issue in relation to school places and investment for physical improvements to existing schools are apparent across all parts of the district. Recent funding problems linked to the loss of Building Schools for the Future, compounded by major population growth (especially in the under 11 profile) means that there are a number of uncertainties surrounding whether or not the district can continue to provide a sustainable, high quality education service, across all parts of the district. Ensuring sufficient capacity will be one of the principal challenges for the district over the next 10 years.</p> <p>The Council's Children's Services have also produced an Education Organisation Plan (EOP), which considers the educational needs in Wharfedale in more detail. The outputs of the EOP have informed the LIP and will continue to inform the update or revision to the LIP. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	
WD2	(IB) 2. Questioning the need for this type of transformational change in Ilkley as it is not	In alignment with the NPPF, the Core Strategy is predicated on planning to accommodate Growth. As a	159

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	underperforming	positively prepared plan, it is appropriate that the visionary sub-area policies reflect this for all sub-areas not just those currently underperforming or in need of regeneration.	
WD2 (B)	(IB) 3. Support for the proposals for the enhancements to the public realm of Ilkley	Noted	103

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Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue)</i>	Council's Response	Respondent
Section 4.4	Pennine Towns & Villages Sub Area		
PN1	Issue A - Distribution and Apportionment		
PN1	(IA) 1. Support for this policy	Noted	129
PN1 (A)	(IA) 2. The Council seem to have chosen the development sizes at random, without much consideration to the local issues facing these areas, and whether they would be able to cope with the increases.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The strategic policies driving economic and housing development are contained in Sections 5.1 and 5.3 of the Plan respectively. The level of development proposed is explained and justified here and in the Background Papers on Economy and Jobs, and Housing. More specific policies and land allocations will be contained in the Allocations DPD.	361
PN1 (A & B)	(IA) 3. Too much emphasis is placed upon housing development in areas of the District where rapid population growth is not anticipated.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The Council disagrees with the assertion made by the objector. Indeed contrary to the point made, the Core Strategy has focused the overwhelming majority of new housing development in the areas where population growth is expected to be greatest. A total of 33,150 new homes or 78.7% of the district wide housing requirement is proposed for the Regional City of Bradford and the Principal Town of Keighley combined. The strategic policies driving the Strategic pattern of development including the housing quantum and distribution are contained in section 5.3 of the plan. The	157

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		objectively assessed housing needs of the district are intended to be met throughout the District as a whole. Where possible, development is focused 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. Housing need has to be considered alongside needs for infrastructure, regeneration and land availability. More specific policies and land allocations will be contained in the Allocations DPD.	
PN1 (A)	(IA) 4. The focus of development in Queensbury and Thornton serve merely housing demand in Calderdale rather than Bradford.	The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The Council disagrees with the point made. There is no evidence in the SHMA to suggest that development in these location would be mainly serving Calderdale. The strategic policies driving housing distribution is set out in Policy HO3. There will howeverl always be a degree of movement across local authority 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 Calderdale which could be bought by people from Bradford who cannot remain there due to the lack of provision of new homes in the area.	
PN1 (A & B)	(IA) 5. Housing apportionment within the South Pennine villages should be seen as the maximum for each settlement rather than a target, to keep the focus in previously developed land.	The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The strategic policies relating to housing numbers are set out in section 5.3 of the Plan. It would not be appropriate or in line with the NPPF to express targets as maximums. Furthermore Policy HO6 sets out the Councils approach to the use of brownfield land. The current drafting of this policy reflects the housing policies HO1 and HO3 and does not make the plan unsound.	160

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PN1 (A & B) / Haworth	(IA) 6. 500 houses for Haworth should be the minimum.	<p>The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The strategic policies relating to housing numbers are set out in section 5.3 of the Plan.</p> <p>The Council do not consider that it would be appropriate to specify the targets for the Local Service Centres as minima. It is important that the Core Strategy contains proposals that give direction and certainty to the Local Plan process and as appropriate to the preparation of Neighbourhood Plans. This also enables the implications for targets to be clear. Expressing the targets as minima or indicative would reduce this certainty and clarity.</p>	108
PN1 (A & B)	(IA) 7. 1,000 homes in Queensbury would be better located in Denholme or Thornton	<p>The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The strategic policies relating to housing distribution are set out in section 5.3 of the Plan, more specifically Policy HO3. The objector provides no justification for the suggested change. Queensbury is a sustainable location for growth and diverting the proposed 1000 homes to Denholme and Thornton would not be a sustainable option and would not be deliverable in terms of the available land supply.</p>	507
PN1 (A & B) / Wilsden	(IA) 8. 200 additional homes in Wilsden would be unsustainable due to inability for infrastructure to cope with the increase.	<p>The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The strategic policies relating to housing distribution are set out in section 5.3 of the Plan, more specifically Policy HO3. The proposed housing target of just 200 new homes over 17 years would be sustainable and could be satisfactorily accommodated.</p>	79, 361
PN1 (B)	(IA) 9. Growth should be contained within the Local Service Centres settlement boundaries.	<p>The SHLAA has indicated that there is not enough available land within settlement boundaries to meet the District's objectively assessed need or to meet the Local Service Centres quanta. The Bradford Growth</p>	79

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		<p>Assessment has indicated that there are options for green belt change in sustainable locations and where such development would not undermine the functioning of the green belt either strategically or locally.</p> <p>More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD and policy HO7 provides the context for this.</p>	
PN1 (B)	(IA)10a. The proposed level of development will lead to the merging of settlements and urban sprawl.	The Sub Area policies are the place specific spatial vision of where the District should be by 2030. Strategic Core Policy 4 (SC4 Point A) states that Bradford's Green Belt has a function to keep settlements separate. There are no proposals within the Core strategy which would require or threaten the merging of settlements.	409, 160
PN1 (B)	(IA) 10b. Oppose ribbon development in the greenbelt along the roads between Harden and Wilsden and Harden and Cullingworth and the Worth Valley	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. 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 Policy HO7 provides the context.	160, 371
PN1 (A, B & E4) / Haworth	(IA) 11. The total amount of housing identified in the SHLAA and the figure given for housing in policy PN1 does not appear to be sufficient to have the confidence that the level of housing proposed can deliver the Plan's policies for the conservation of the historic environment	The Sub Area policies are the place specific spatial vision of where the District should be by 2030. The allocation of 500 new homes within Haworth over approximately 17 years has been reduced since the Further Engagement Draft stage by 100 dwellings. It is difficult to see how or why the specified concerns would arise particularly given sensitively and well designed schemes which reflect the local area in accordance with policy EN3 which would be required at the planning application stage.	103
PN1 (B)	(IA)12. There is scope to extend Queensbury	Noted	129

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	without causing environmental harm as it is not in a flood risk area and there are no traffic problems		
PN1 (B)	(IA) 13. Support for the identification of Queensbury as a Local Growth Centre	Noted.	129, 447
PN1 (B)	(IA) 14. Support proposals for growth at Thornton as a Local Growth centre	Noted	447
PN1 (B)	(IA) 15. Proposed amendment:- ‘The Local Service Centres of [Harden – deletion], Oakworth, Oxenhope and Wilsden will see between them the creation of 500 new homes from sites within the existing settlement boundaries together with some local green belt changes. Proposed Addition:- <i>“The Local Service Centre of Harden will see the creation of 100 new homes from sites within the existing settlement boundaries or from very limited, alternative local green belt changes.”</i>	The Council disagrees with this suggested change. The wording chosen by the Council reflects the proposed housing target and the SHLAA which indicates the scale and location of potential sites in the area to meet that target.	160
PN1 (C1 & C3)	(IA) 16. The Plan is unsound because the proposed housing figure for Haworth is undeliverable re safeguarding the landscape setting and the character of its Conservation area.	The Council disagrees. The Sub Area Policies are the place specific spatial visions of where the District should be by 2030 The housing figure proposed is not undeliverable and would not adversely impact upon the landscape setting of the settlement. The strategic policies relating to Heritage are set out in the strategic objective 12; policy SC1 (B7) and (B11); and EN3 of the Plan. Furthermore the plan contains policies which will guide the process of site selection and the design of new	103

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		development and thus ensure that impacts are avoided or mitigated.	
PN1	Issue B - Greenbelt		
PN1 (A)	(IB) 1. The exceptional circumstances for development in the green belt have not been met	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District. The NPPF allows for a review of the Green Belt through Local Plan production or review and allows boundary changes under exceptional circumstances. The objectively assessed Housing Requirement for the plan period cannot be met in full without the use of land currently designated as Green Belt. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD. Policy PN1 A reflects SC7, NPPF and the strategic policies that drive the pattern of development in sections 5.1.and 5.3.	361
PN1 (A & B)	(IB) 2. Greenbelt releases in Queensbury and Thornton will have to take account of reserve land requirements to provide further certainty of overall supply and flexibility in delivery.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. The Sub Area policy reflects policy SC7 on Green Belts and the approach to safeguarding there within.	447
PN1 (B) / Thornton	(IB) 3. Major concerns regarding the re-use of Greenbelt land for development	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies the approach to Green Belt releases required to deliver longer term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. 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	409

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		green belt sites. The NPPF make it clear that Local Plans are the appropriate mechanism for meeting this need. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD.	
PN1 (B)	(IB) 3a. Proposals for Green Belt releases are unclear and fail to set out the exceptional circumstances needed to justify a release.	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies that Green Belt releases will be required to deliver longer term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. These are underpinned by the Growth Study which looked at the Strategic functions of the Green Belt. The SHLAA has assessed both greenfield sites and brownfield sites across the district and evidenced that there is not an adequate supply of developable previously developed land to avoid development in greenfield and Green Belt sites. The NPPF make it clear that Local Plans are the appropriate mechanism for meeting this need and under exceptional circumstances using Green Belt releases. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD and policy HO7 provides the context for this.	409, 494
PN1 (B)	(IB) 3b. Greenfield and Green belt releases should be as limited as possible	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies that Green Belt releases will be required to deliver longer term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. Policy HO6 and the Brownfield Strategy, Appendix 6 Table 4, aim to maximise PDL development	160

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		whilst recognising the importance of non PDL contributions to five year supply and unmet need in the district. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD and Policy HO7 provides the context. Indeed Policy HO7 specifically requires that the use of green belt land is minimised.	
PN1 (B) / Wilsden	(IB) 4. There should be no green belt releases	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Policy SC7 identifies that Green Belt releases will be required to deliver longer term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases are set out in sections 5.1 and 5.3 of the plan. 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. The NPPF make it clear that Local Plans are the appropriate mechanism for meeting this need. More specific policies and land allocations, detailing the exact releases for Wilsden will be contained in the Allocations DPD.	79
PN1 (B)	(IB) 5. Impossible to assess from the policies which areas of Greenfield and Greenbelt land in each sub-area will be affected by the policies. Without this connection it is difficult to assess the degree to which policies have been positively prepared in pursuit of sustainable development	The Sub Area Policies are the place specific spatial visions depicting where the District should be by 2030. Based on the most up to date evidence the objectively assessed need cannot be met without the need for significant release of land from the current Green Belt under NPPF exceptional circumstances and the use of green field sites. Policy SC7 identifies the approach to Green Belt releases that will be required to deliver longer term housing and jobs growth in the District. The strategic policies driving the pattern of development across the district and the need for Green Belt releases	394

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		are set out in sections 5.1 and 5.3 of the plan. The Strategy to direct the Majority of growth to the Regional City, then Principle Towns and growth areas is contained in Policy SC4. The Core Strategy is supported by the Growth Study which looked at the land around all settlements with regard to the role and function of the Green Belt at a broad level and did not indicate any significant issues for delivering the strategy. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD, Policy HO7 aims to direct development that is as sustainable as possible.	
PN1	Issue C - Landscape And Character Setting		
PN1 (B) / Haworth	(IC) 1. Proposed policy amendment (second Paragraph, line 3) amend to read:- <i>“... with some local Green Belt changes. The new homes in and around Haworth will be delivered in a manner which will safeguard those elements which contribute to the landscape setting of the village and the character of its Conservation Area”.</i>	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The NPPF makes it clear that Local Plans are the appropriate mechanism for meeting this need and under exceptional circumstances using Green Belt releases. More specific policies and land allocations, detailing the exact releases will be contained in the Allocations DPD and policy HO7 provides the context for this. The Council agrees with the objector that it is important that the plans policies and proposals safeguard the landscape setting of Haworth. This is reflected in Strategic Objective 12, which states that the historic built and natural heritage should be safeguarded and enhanced; and parts B7 and B11 of Policy SC1 which state that; the character and qualities of the districts heritage should be protected and enhanced, (B7); and ensuring that developments are of a high quality and well designed so they contribute to protecting and enhancing the local setting and heritage (B11). The suggested change to Policy PN1 is not necessary as the principles of safeguarding the landscape setting	103

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		of Haworth and safeguarding the character of its conservation area are already embedded within and fully reflected in the plan.	
PN1 (A) / Haworth	(IC) 2. Concerns about the potential impact which the proposed level of housing growth for Haworth might have upon the character and landscape setting of the settlement.	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>There is no reason why careful site selection and appropriately designed and landscaped developments need have the impacts feared by the objector.</p> <p>The Council agrees with the objector that it is important that the plans policies and proposals safeguard the landscape setting of Haworth. However the suggested change to Policy PN1 is not necessary as the principles of safeguarding the landscape setting of Haworth and safeguarding the character of its conservation area are already embedded within and fully reflected in the plan. The relevant parts of the plan are:</p> <ul style="list-style-type: none"> • objective 12, which states that the historic built and natural heritage should be safeguarded and enhanced; and • parts B7 and B11 of Policy SC1 which state that ; the character and qualities of the districts heritage should be protected and enhanced, (B7);.and ensuring that developments are of a high quality and well designed so they contribute to protecting and enhancing the local setting and heritage (B11); 	103
PN1 (A) / Haworth	(IC) 2a. The Plan is considered unsound because it cannot demonstrate that the proposed housing figure for Haworth is	<p>The Council disagrees and considers the proposed level of development appropriate, justified and sound. The Council have carried out some further work to</p>	103

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	<p>deliverable in a manner which would safeguard the landscape setting of Haworth and the character of its conservation area. Proposed policy amendment – Reduce the number of residential units for Haworth to a level which is likely to be deliverable in a manner which would safeguard the character and landscape setting of the settlement.</p>	<p>assess the capacity of sites which may be required to meet the proposed housing target for Haworth. It has concluded that a change to reduce the target is not justified. This work is explained in more detail in the section of the responses table which deals with Policy HO3. The Council therefore considers that Policy PN1 (A) is sound as drafted and the additional suggested text is not needed and would duplicate other aspects of the plan.</p>	
PN1 (C3) / Haworth	(IC) 3a. Bronte moorland and village heritage to be given greater protection and priority in planning decisions	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>The strategic policies relating to Heritage are set out in the Strategic Objective 12; Policy SC1 (B7) and (B11); and EN3 of the Plan.</p> <p>No policy amendments have been proposed, and the Council does not consider any additional protection is required in the Core Strategy.</p>	66
PN1 (E1)	(IC) 3b. Support for the intention to safeguard the moorland around Haworth and the cultural associations with the Bronte's.	Noted	103
PN1 (E2)	(IC) 3c. Support for the intention to safeguard the open skylines and wilderness of the South Pennine Moors and the contribution they make to the visitor experience	Noted	103
PN1 (E4)	<p>(IC) 3d. Support for the intentions behind this criterion, but it would benefit from identifying more specifically which particular aspects of the heritage are of especial importance in this part of the District. Proposed policy amendment:-</p> <p><i>“Conserve and enhance the heritage assets</i></p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>Referring to specific areas would provide additional clarity but the policy as drafted is not unsound.</p>	103

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	<i>of the Pennine towns and villages especially those elements which make a significant contribution to the distinct character of this area including: the mills, chimneys and associated housing of its textile heritage; and the buildings and landscapes associated with the Brontës”</i>		
PN1 (E3)	(IC) 4. Support for this policy criterion to “Value the historic networks of narrow winding lanes, footpaths and packhorse trails and encourage their use for recreation linked to the local, regional and national cycle and footpath routes”.	Noted	103, 371
PN1 (E5)	(IC) 5. Support for this policy criterion.	Noted	103
PN1 / Thornton	(IC) 6. The scale of proposed development will result in the demise of the local character and identity of the local villages.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The objector provides no justification or explanation for the suggested effects. The Council is proposing modest amounts of development in the villages which will actually support their vitality.	409
PN1	Issue D - Infrastructure		
PN1 (A)	(ID) 1. Shipley PC settlements do not have the infrastructure to support the proposed apportionment; Stretched resources Congestion Some area / villages are remote from high quality public transport links	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.	361

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		<p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p> <p>Proposed major improvements to the transport network are also set out in the LIP. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p>	
PN1 (B)	(ID) 2. Lack of appropriate infrastructure to support proposed developments	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	361, 409, 507
PN1 (B)	(ID) 2a. Local schools are over subscribed and the cost of providing additional will be prohibitive to developers viability	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for</p>	160, 409, 507

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		<p>infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>The findings from the LIP indicate that the issue in relation to school places and investment for physical improvements to existing schools are apparent across all parts of the district. Recent funding problems linked to the loss of Building Schools for the Future, compounded by major population growth (especially in the under 11 profile) means that there are a number of uncertainties surrounding whether or not the district can continue to provide a sustainable, high quality education service, across all parts of the district. Ensuring sufficient capacity will be one of the principal challenges for the district over the next 10 years.</p> <p>The Council's Children's Services have also produced an Education Organisation Plan (EOP), which considers the educational needs in Wharfedale in more detail. The outputs of the EOP have informed the LIP and will continue to inform the update or revision to the LIP. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	
PN1 (B)	(ID) 2b. Local dentists and doctors lists are over subscribed.	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.	160, 409, 507

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		<p>New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made.</p> <p>Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.</p>	
PN1 (B)	(ID) 2c. Support for the following statement: <i>“...provision will be made for associated community facilities, in particular, health care, open space and recreational facilities at Harden, Oakworth and Oxenhope to address current deficiencies.”</i>	Support noted	160
PN1	Issue E - Transport		
PN1 (B)	(IE) 1a. Many of the South Pennine villages suffer from extreme congestion at peak time and at the weekend.	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The Council has confidence that future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation</p>	361

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		measures.	
PN1 (B)	(IE) 1b. Lack of appropriate traffic infrastructure to cope with the proposed increase; detailed investigation is needed for issues to be addressed.	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The Council has confidence that future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p>	160, 361, 409, 507
PN1 (B)	(IE) 1c. There is no indication as to how improvements in transport infrastructure in the South Pennine Villages will be delivered.	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The Council has confidence that future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p>	361, 494
PN1 (B)	(IE) 1d. Key road investment is essential to remove capacity restraint in the Aire Valley. This includes the Hard Ings work at Keighley, the Shipley Eastern Relief and improvements to the road infrastructure related to the junctions on the A650 at Cottingley.	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The Council has confidence that future capacity issues</p>	494

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		arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.	
PN1 (B)	(IE) 1e. Concern regarding the sustainability of drainage systems in many of the proposed locations	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. New development can generate demand for infrastructure and the Local Infrastructure Plan (LIP), and Infrastructure Delivery Schedule (IDS), sets out how the Core Strategy will be supported by appropriate infrastructure. The LIP concluded that there is broadly sufficient infrastructure, either currently or planned, to support the housing and economic growth aspirations for the Bradford district up to 2030. This relates to the strategy of the plan, where specific site choices have not yet been made. Policies ID4 and ID5 seek to ensure that appropriate infrastructure is planned and delivered through effective partnerships and highlights the role of Development Plan Documents and Supplementary Planning Documents where specific infrastructure schemes could be promoted.	409
PN1 (F1)	(IE) 2. Support – ‘To maximise the opportunities to use non car modes of transport and reduce the need to travel’.	Noted	371
PN1 (F)	(IE) 3. There is a need for a policy for the protection and enhancement of existing public footpaths, e.g. the Bronte Way	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. The sections of the Bronte Way that pass through the Bradford District are on Public Rights of Way which are protected under the Highways Act 1980. This legislation protects all Public Rights of Way in the district The Rights of Way Improvement Plan aims to assess the extent to which the network meets present and likely future needs and includes actions to secure an improved	371

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Section 4 – Sub Area Policies 4.4 – South Pennine Towns and Villages**

		<p>network.</p> <p>TR4 (D) acknowledges the contribution of and supports the maintenance and development of walking trails and bridleways.</p> <p>Specific protection of named routes in the Core Strategy would be a duplication of existing protection.</p>	
PN1	Issue F - Economic Development		
PN1 (C3)	(IF) 1a. Support for the promotion of sustainable tourism that respects the Bronte Heritage of Haworth and Thornton and the importance of the Worth valley Railway.	Noted	103
PN1 (C3)	<p>(IF) 1b. Policy could be expanded to try to ensure the economic benefits of the tourist industry at Haworth are spread across the remainder of the heritage tourist attractions along the Aire Valley.</p> <p>Suggested policy addition:-</p> <p><i>“... and support initiatives which would help to better promote and improve connectivity and linkages between Haworth and the other heritage assets along the Airedale corridor.</i></p> <p><i>To ensure that Haworth’s benefits are spread across the remainder of the heritage tourist attractions along the Airedale corridor.”</i></p>	<p>The Sub Area Policies are the place specific spatial visions of where the District should be by 2030.</p> <p>Connectivity is considered under section PN1 (F) and AD1 (E) on Transport. In AD1 section E3 looks to improve links between villages in Airedale.</p> <p>The Council considers that the policy as drafted is sound. The proposed change would add unnecessary duplication</p>	103
PN1 (C3) / Haworth	(IF) 2. An integrated economic, housing and transport strategy should be developed to recognise the role of tourism in Haworth.	The Core Strategy contains integrated policies and proposals which recognise and seek to enhance the role of Haworth as a tourist destination. More detailed proposals can as appropriate be brought forward either within the Allocations DPD or within a Local	114

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		Neighbourhood Plan. Tourism, appropriate to this strategic document, is dealt with in EC1 J, EC4 F It is not appropriate to include detailed and specific measures for tourism in Haworth in the Core Strategy.	
Issue G – Figure PN1			
Figure PN1	(IG) 1. Support the identification of the protection and enhancement of the Pennine Upland landscape and the development of tourism and leisure destination role of Haworth and Thornton as key elements of the Spatial Vision part of the District.	Noted	103
Section 4 – PN2 Pennine Towns & Villages Sub Area			
PN2 / Para 4.4.3 / Haworth	1. Welcome the vision for Haworth by 2030, however this paragraph could be amended to read: <i>“...and television productions. The success of Haworth has also helped to increase the numbers of visitors to other heritage assets along the Airedale Corridor. Housing development ...”</i>	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. This text forms part of the Outcomes for 2030 section. Whilst the addition could be considered, without it the plan remains sound.	103
PN2 / Para 4.4.3 / Haworth	1a. Broadly support the need for Haworth to meet the housing needs of the area, this has to be achieved in a manner which safeguards the distinctive character of the town and its landscape setting. Paragraph 4.4.3 add to end: <i>“...in a manner which has safeguarded its distinctive character and its landscape setting”.</i>	The Sub Area Policies are the place specific spatial visions of where the District should be by 2030. This text forms part of the Outcomes for 2030 section. Whilst the addition could be considered, without it the plan remains sound.	103
PN2 / Para 4.4.4 / Thornton	2. Support the vision for Thornton by 2030. That Thornton will have continued to exploit its	Noted	103

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	tourism and leisure potential linked to the Haworth and Bronte country.		
PN2 / Para 4.4.5	3. Support for the vision for Oakworth, Oxenhope, Wilsden and Cullingworth, that the villages will have retained their individual character and sense of place.	Noted	103
PN2 (B)	4. Welcome for the intention that investment should focus on supporting developments which are of scale appropriate to the settlement, that involve re-using existing buildings, and which provide sensitive enhancement of heritage assets of the public realm.	Noted	103
PN2 (E)	5. Welcome for the intention that investment should show respect for and enhancement of the moorland setting, character and integrity of the tradition grit stone buildings and features, routes and viewpoints associated with the Brontes, early stages of agriculture and the development of textiles industry.	Noted	103

Appendix 7H – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 5 – 5.1 – Economy and Jobs

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue)</i>	Council's Response	Respondent
Section 5.1	Economy and Jobs		
Section 5.1	1. Develop brown field sites in Keighley for employment purposes before allocating new Greenfield sites.	To encourage economic development and investment and the creation of jobs, well located employment sites are required to attract entrepreneurs. Not all brown field sites are suitable for the needs of industry.	371
Policy EC1	Creating a successful and competitive Bradford District economy within the Leeds City Region		
EC1 (J, K)	1. Quarry sites should be specifically referenced within the policy.	The Policy sets out the key priorities in support of economic growth. It is not a comprehensive review of all types of economic development. While it is recognised that quarries do provide an economic role in the District they do not need to be explicitly referenced within the policy.	407
EC1 (M, N & J)	2. The plan conflicts with NPPF paragraph 28 as it does not support development and diversification of agricultural and other land use rural business, or tourism and leisure developments.	Policy EC4, section G allows for the types of rural development outlined in the representation.	142, 145, 147, 171, 183, 333, 336, 367, 370, 378, 516
EC1	3. Support	Noted	103, 431, 447, 487
Policy EC2	Supporting Business and Job Creation		
EC2	1. Support	Noted	447
EC2	2. The target of creating 2897 jobs per annum is at odds with the proposed housing target which could only support 1600 jobs per annum. The jobs target is not achievable and cannot be justified.	The Council accepts that there is a need for the Core Strategy as a whole to adopt consistent assumptions on jobs growth. However, it should be noted that unemployment is rising and the working age population is growing. The growth in the number seeking job seekers allowance together with the future growth in new jobs across the District means that	135, 342, 423

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		<p>almost 50,000 jobs need to be created over the plan period for 'full employment'. This equates to around 2897 per annum. It is important to stress that this is a theoretical and aspirational figure as experience shows that 'full employment' is an unlikely concept. Reducing employment levels to the national average, something which has not happened in recent years, would itself be a significant challenge. Nevertheless, the Policy would still support any measures which address unemployment in the District and promote economic growth. The figure of 2879 jobs is not a target figure. The plan cannot provide these new jobs but can only help create the conditions to foster economic growth. The Council recognises that the REM currently estimates jobs growth in all sectors at approximately 1600 per annum. This projection is still used as an overall guide and indicator in determining the required land allocation for industrial development which is primarily based on previous annual take-up rates. The REM jobs projections were also used in the scenarios for establishing the objectively assessed housing need.</p> <p>The figure of 135 hectares relates only to the B class uses as defined in the Use Classes Order. The plan does not identify sites for the other sectors such as health, education, leisure, retail, tourism, agriculture etc which provide employment opportunities for a large number of the District's residents. The Plan as currently drafted includes an aspiration that jobs growth might be achieved at a much higher level than is currently and consistently modelled within the Yorkshire and Humber REM.</p>	
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		While not considered a matter of soundness a minor change could be made in order to clarify policy EC2 in terms of the relevance and use of the jobs number	
EC2	3. The proposals do not indicate how the District will grow its job numbers.	As noted above, the Local Plan cannot provide jobs. Through policy, it can only help create the conditions which may help foster economic growth and a subsequent growth in jobs numbers. The Policy clearly sets out the key priorities areas for action in support of economic development. A range of interventions are proposed including investment in key locations and also key sectors as well as allocation of well located sites to attract new inward investment. These initiatives will help provide the conditions for new jobs growth.	202
EC2 (A)	3. Not sufficient information on proposed employment sites for Ilkley.	Detailed assessment of the potential land to meet the Core Strategy distribution will be addressed in Allocations DPD.	156
EC2 (A)	4. Objects to Part A which states that 'land allocated for employment purposes will not be granted permission for alternative uses', as it is contrary to paragraph 21 of NPPF.	The Core Strategy plans for future economic growth by providing a range of appropriate development sites which meet the development needs of business. In this respect, the Local Authority sets out an economic vision and strategy which, as well as identifying such sites, ensures that they are protected to meet anticipated needs over the plan period as stated in NPPF paragraph 21. Paragraph 21 also states that local authorities should set the criteria which reflect the economic vision and in this case, one of those criteria is the protection of sites solely for employment purposes. Consequently there is no conflict with NPPF paragraph 21 which relates to business uses and the setting of criteria for the provision of sites for inward investment.	444

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Policy EC3	Employment Land Requirement		
EC3	1. Additional commercial development in the District is not sustainable as the transport system is already congested, and a modal transfer to public transport is not practicable.	Economic development and inward investment is a strategic core policy for the district. The importance of transport in support of both homes and jobs is recognised within the plan specifically in Policies SC1 (10), SC3 and Section 5.2 on Transport and Movement.	4,
EC3	2. Bolton Woods Quarry can provide an element of employment and, due to its large scale, should be specifically acknowledged within the CS.	Only large green belt releases are identified within the CS. Other strategic sites and sources of employment will be identified in the allocations DPD.	407
EC3 (A) 3	3. Support this policy	Noted.	406
EC3 (A) 3	4.. The plan conflicts with NPPF paragraph 37 as it does not balance land uses, including housing, with proposed supply of 5ha of new employment land in Ilkley.	The total employment land supply figure is based upon the uptake of land for employment purposes since 1993 within the District. The distribution of employment land is based directly upon the distribution of population across the District. It also reflects the settlement hierarchy as set out under Policy SC4. There has been a slight reduction in the proposed allocation of employment land in Wharfedale from the figure in the FED because of the impact of the Habitat Regulation Assessment findings and related reduction in proposed housing distribution within the Core Strategy. Providing employment land in Wharfedale reduces the need for residents to commute to other areas of the District thus introducing a degree of balance as advised in paragraph 37 of the NPPF. Note that the 5 ha proposed is for Wharfedale as a whole, though the focus will be in Ilkley as Principal Town.	115, 142, 183,317, 336, 367, 370, 516

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		See further information in Background Paper 3 on Employment.	
EC3 (A) 3	5. The proposed scale of development in Wharfedale is too high and contradicts the aims of WD1/E1.	The scale and distribution of new employment land relates to perceived jobs growth, sector growth, previous take up of employment land and the definition of Ilkley as a principal town which can accommodate economic growth. The actual amount is based on relative population statistics at the beginning of the plan preparation, based on past take up and on the proposed housing growth in Wharfedale.	74, 87, 116, 148, 159, 223, 305, 306
EC3 (A) 3	6A. The vacant industrial units at 'Riverside' indicate that Ilkley has a greater supply than demand for employment land and the proposal for 5ha in Wharfedale is unfounded.	There has been a steady take up of employment land in Ilkley for a number of years and only one allocated employment site remains out of the RUDP allocation. In the RUDP there were 2.28 hectares of employment land allocated and previously 2.36 hectares in the UDP. Only one constrained employment site remains undeveloped at present. As Ilkley is identified in SC4 as a Principal Town with an increase in population and housing being planned for, demand for employment land throughout the plan period will continue.	170
EC3 (A) 3	6B. 5 Ha of employment land in Wharfedale yet supply of employments sites in Ilkley exceeds demand, empty units.	See response 6B above.	170
EC3 (A) 3	7. The strategy will impact severely on the infrastructure of Ilkley and other areas of the District. The obvious employment requirement is not available and there is little room to develop such employment infrastructure.	Only one of the former employment sites in Ilkley Allocated in the RUDP remains undeveloped, thus showing an underlying demand for investment opportunities. Indicators such as the REM show a growth in the professional and service industries which will be required in Ilkley, as a Principal Town. Sites to be identified in Allocations DPD. A detailed	178

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		<p>site selection methodology will be consultation upon as part the work on the Allocations DPD.</p> <p>The Core Strategy is supported by a Local Infrastructure Plan.</p>	
EC3 (A) 3	8. Distribution of employment land in Wharfedale should be more aligned with housing increase.	See response to 4 Above.	406
EC3 (A) 3	9. Object to the reduction in employment land in Wharfedale from 10 hectares in FED to 5 hectares in the Publication Document and they suggest a figure of 7 hectares. The HRA does not justify this reduction as mitigation strategy and associated measures have not been fully considered.	<p>See response top 4 above.</p> <p>The overall employment land requirement for the District has reduced from 146 hectares to 135 hectares. The reduction for Wharfedale reflects this change as well as the reduction in the number of new dwellings proposed for Wharfedale sub area under Policy HO3.</p> <p>In line with HRA findings verified by further update the Council chose to reduce the requirement for Wharfedale in order to ensure appropriate precaution ahead of site allocations. Nevertheless, an allocation of 5 hectares is not insignificant.</p>	447
EC3 (A) 3	10. There is no / lack of employment opportunities in Ilkley to support the proposed number of new homes.	The Plan proposes an allocation of 5 hectares of employment land in Wharfedale, based on perceived sector growth and on past trends of employment land take up. It will provide a source of employment opportunities for local residents thus reducing the need to commute. Ilkley, as a Principal Town, employs a considerable number in the professional services sector, in tourism, in retail and the service sector. There is also good connectivity to employment centres elsewhere, both inside and outside the District.	310, 337, 383, 398, 403, 410, 418, 441

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EC3 (A) 3	11A. Wharfedale is not an accessible location in general industry and commerce terms as there is poor links to the motorway network.	The Regional Econometric Model (REM) anticipates future growth in Professional Services, Administration, Finance, Computing and Information, and media, in that order. The location of such industries is not dependant on accessibility to the main transport infrastructure such as the other potential growth industries, of Transport and Warehousing, Chemicals, and Construction. The former 'office based' sectors can be located in the principal towns and larger settlements such as Ilkley. All of the previously allocated employment sites in Wharfedale have now been developed which implies demand. The anticipated housing growth in Wharfedale may suggest a need for small additional service industries together with small to medium enterprises to developed by local entrepreneurs. The adjacent Leeds district does not provide this need as they have not allocated a quantum of employment land in the northern part of the Leeds district.	25, 73, 74, 87, 88, 91, 133, 342
EC3 (A) 3	11B. Poor transport system discourages real growth in new employment in lower Wharfedale.	See response to 11A above	74, 342
EC3 (A) 3	12. Lacks evidence on how employment provision in Ilkley will support proposed population growth in Ilkley.		74, 115, 143, 149, 197, 236, 473
EC3 (B)	13. Additional source of employment land should include: 'Previously developed Land and Buildings.	The plan needs to be read as a whole. In this context the use of suitable and deliverable previously developed land is a key principle in Policy SC5 which sets out the sequence for assessing the broad choices of land for both Housing and Employment.	188
EC3 (C)	14. Although there is an underlying support in that Highways Agency is committed to working with the Council to delivering the proposals,	Noted. The Council will continue to work with Highways Agency under the Duty to cooperate to share evidence and information. In particular it will	161

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	development of land for major employment purposes within the M606 corridor could have an adverse impact on the operation of the M606 motorway.	work closely as part of the Allocations DPD in determining any site allocations and related infrastructure requirements and will liaise with Highways Agency on the implications of impact on the motorway infrastructure, including safety factors highway capacity and traffic congestion.	
EC3 (C)	15. Impossible to assess from the policies which areas of Greenfield and Greenbelt land in each sub-area will be affected by the policies. Without this connection it is difficult to assess the degree to which policies have been positively prepared in pursuit of sustainable development	The Policies provide an overview of the distribution of new employment land across the district. The specific sites for future development will be identified in the Allocations Development Plan Document.	394
EC3	16A. Support	Noted	406, 431, 444, 487
EC3 (C)	16B. Support for part C relating to the M606 corridor incorporating a green belt release as a location for large scale industry.	Noted	53, 123
Policy EC4	Sustainable Economic Growth		
EC4 (E)	1. New priority business sectors should be located in areas which have good transport accessibility and opportunities for modal split. They should not be located in the Worth Valley area of Keighley which has a sensitive physical and natural environment.	New employment land sites will be considered at allocations stage and transport accessibility and opportunities for alternative forms of travel will be a consideration. In addition, planning applications for new developments will be assessed through the development management principles set out in Policy EC4 and in the NPPF.	371
EC4 (G)	2A. The plan conflicts with NPPF paragraph 28 as it does not support development and diversification of agricultural and other land use rural business or tourism and leisure developments.	Policy EC4, section G allows for the types of rural development outlined in the representation.	142, 145, 147, 171, 183, 333, 336, 367, 370, 378, 516
EC4 (G)	2B. There is no development identified of rural	Land use proposals and uses for specific areas of the	122, 367, 370

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Ilkley	tourism, leisure developments or agricultural land and rural business development.	District, including Ilkley, will be identified in the 'Allocations DPD'. Policy EC4, section G allows for the types of rural development outlined in the representation.	
EC4 (l)	3. Part I of the policy allows substandard development to take place leading to an increased carbon footprint when a much better quality is required and possible. The level should be reduced from 1000 sq metres to 500 sq metres.	The policy already allows for BREEAM very good and later for BREEAM Excellent on developments above 1000 sq metres. Reducing the development criteria to 500 sq metres may render the development unviable and attach an additional burden to securing inward investment. See Core Strategy Viability Assessment.	192
EC4	4. Support	Noted	188, 407
Policy EC5	City, Town, District and Local Centres		
EC5	1. Support for EC5 criteria A as it supports Bradford as the focus for delivering a wide diversity of economic activity, including offices, residential, retail, markets, leisure, entertainment, arts, tourism and sports.	Noted.	188.
EC5	2. The ability of Bolton Woods Quarry site to play an important role within should be acknowledged within the Core Strategy and advanced appropriately within the more detailed documents.	The Council recognised that key sites, such as Bolton Woods Quarry may have opportunities for a mix of land uses in addition to housing including employment and supporting local shops and services. It is not appropriate or necessary to make specific reference of this site within the policy or supporting text. The Shipley & Canal Road Corridor AAP will be subject to separate consultation and engagement where the site specific considerations will be considered in detail.	407.
EC5	3. Policy EC5 (e.g. first paragraph Part G; Part H) also seeks to apply a test of "scale" to	The policy as drafted is sound. The NPPF, Part E and Part F of Policy EC5 do not prohibit a test of scale to	430.

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	“planning decisions” which does not reflect the terms of the NPPF or Part E and F of the Policy.	retail planning decision. The National Planning Guidance for ‘Ensuring the Vitality of Town Centres’ at paragraph 10 and paragraph 16 highlights that scale is a consideration in the sequential test and impact test. The changes proposed are not required to make the plan sound.	
EC5	4. Bradford Broadway Ltd. support policies in the Publication Draft and the local plan, in particular Policy EC5.	Noted.	434.
EC5	5. The policy for enhancing the role and function of all identified centres is supported.	Noted.	447

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Section 5 – Chapter 5.2 - Transport and Movement

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised (Separate row for each issue/sub issue.)	Council's Response	Respondent
Policy TR1	Travel Reduction and Modal Shift		
TR1	1. The plan does not include details on how the road network will be improved to handle extra traffic. A "Programme of Funded Improved Transport Infrastructure" is required.	<p>Policy TR1 sets out the broad principles to achieve a framework for development across the District and is compliant with National Planning Policy Guidance.</p> <p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p> <p>The Core Strategy will help to inform infrastructure partners longer terms investment decisions. The Highways Agency and Network Rail are already proposing and developing programmes of work to deliver significant improvements to the strategic road network and rail network respectively which have been informed by the work on the Core Strategy to date.</p> <p>Further work will be undertaken as part of the more detailed site allocations work, in subsequent allocating Development Plan Documents, to determine more local improvements and mitigation.</p>	185
TR1	2. The Plans development proposals will lead to increased traffic; add to congestion and increase use on public transport, despite the good intentions	Policy TR1 sets out the broad principles to achieve a framework for development across the District and is compliant with National Planning Policy Guidance.	116 179

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	<p>included in Policy TR1.</p> <p>TR1 is unachievable.</p>	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p>	
TR1	<p>3. Rural areas have more car users as the public transport system proves to be un-useable in terms of reliability, frequency and cost. Current transport links in Wharfedale are not adequate. The existing road network is subject to limitations; public transport is not a realistic choice for many who live in this area. The majority of the working population in the Wharfe Valley will commute to work, predominately Leeds and Bradford. The public transport system does not currently offer an adequate choice for those residents who commute. The trains are already full at peak times; bus services are slow and costly.</p>	<p>The Council accepts that in some rural areas where public transport is limited residents will use private car as their preferred means of travel. Within Wharfedale the Council considers Rail Services and station catchments to be adequate and that a good service is accessible and available to most residents in all settlements apart from Addingham. There are currently plans to extend Park and Ride facilities at Menston.</p> <p>The Council has confidence that future capacity issues for both road and rail, arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>Further work will be undertaken as part of the more detailed site allocations work to determine more local improvements and mitigation.</p>	179
TR1	<p>4. The roads linking Leeds and Bradford are heavily congested. These provide vital communication links for local residents and people accessing employment in Leeds City Centre. Leeds housing plans will also impact on infrastructure. The potential level of housing development and its impact on West and North West Leeds is unsustainable on the present road network.</p> <p>Concrete proposals have to be put in place to deal with an increase in the number of journeys and the</p>	<p>TR1 sets out the broad principles to achieve a framework for development across the District and is compliant with National Planning Policy Guidance.</p> <p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p>	185

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	<p>impact this will have on key roads and junctions between Leeds and Bradford.</p> <p>Productivity, growth and quality of life will all be curtailed if measures are not taken to alleviate congestion and impact on services.</p> <p>There are a number of developments already in the pipeline that will directly impact on the roads. Without proper provision for additional capacity on the roads or measures to mitigate against the increase in journeys the plans are not sustainable. Simply encouraging a modal shift and greater use of public transport is not enough. There is a need for investment in the traffic network.</p>	<p>The location of new development will aim to maximise opportunities for travel by sustainable modes.</p> <p>Further work will be undertaken as part of the more detailed site allocations work to determine more local improvements and mitigation.</p> <p>The Council is actively engaged with Leeds City Council, other adjacent Local Authorities, West Yorkshire Combined Authority (WYCA), the Highways Agency and Network Rail under the Duty to Co-operate to identify appropriate mitigation measures to cross boundary transport issues.</p> <p>The Duty to Cooperate Statement sets out more information on strategic planning approach to transport.</p>	
TR1	<p>5. Modal shift could be achieved by offering business relocation to areas that will lead to a reduction in road freight transport and overheads. This will also help by reducing wear and tear on the roads.</p>	<p>These comments are noted.</p> <p>Policy TR1 encourages travel reduction and modal shift and therefore would support proposals for business relocations where outcomes achieve modal shift though financial incentives are not something that can currently be considered.</p>	371
TR1 omission	<p>6. The Plan does not contain a reference to a new station at Manningham.</p>	<p>The Council are no longer looking to deliver a new station at Manningham in the plan period.</p> <p>The proposal for a station at Manningham was still being considered at the time of earlier consultation versions of the Local Plan Core Strategy but it is now considered that focussing investment at Frizinghall Station would be a more effective use of resources whilst avoiding the additional delays to trains that would occur by stopping at Manningham.</p>	14
TR1 omission	<p>7. The plan does not detail any further improvements planned for the Shipley rail station area.</p>	<p>Improvements are planned to the Shipley and Frizinghall Stations and will be detailed in further updates to the Local Infrastructure Plan in the Bradford & Shipley Section.</p>	14

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Section 5 – Chapter 5.2 - Transport and Movement

<p>TR1 omission</p>	<p>8. Greater use of walking and cycling as modes of transport, particularly over short distances, requires encouragement and investment in the existing footpath network.</p> <p>The public rights of way network in Bradford District includes over 1100km of public footpaths, bridleways and restricted byway. The Rights of Way Improvement Plan aims to assess the extent to which the network meets present and likely future needs and includes actions to secure an improved network. The rights of way network represents an important resource and work on identifying strategic green infrastructure networks needs to reflect this.</p> <p>If there is no active policy put into force to deal with these footpaths now all opportunity will be lost forever.</p> <p>Doorstep to Destination Network of Paths - It already exists all that is required is that the paths are registered/reopened, conserved, preserved and enhanced.</p>	<p>Although this comment is linked to the Transport Chapter it is specifically concerned with Public Rights of Way.</p> <p>Strategic Core Policy SC6: Green Infrastructure, outlines the overall approach to protecting and improving the Rights of Way and access network across the whole District (Section 3: Spatial Vision, Objectives and Core Policies)</p> <p>The Council has also produced a Rights of Way Improvement Plan which covers the more technical, network management issues.</p> <p>The Design policies in particular Policy DS4, also seek to encourage any new development is accessible and makes use of and connecting to existing rights of way where available.</p>	<p>371</p>
<p>TR1 (A)</p>	<p>9. The impact from proposed new developments on the road and rail network requires further consideration.</p>	<p>The Transport Study provides an outline of the impact on the road network and public transport network. This will inform further work as part of the allocations process.</p> <p>The proposals of the emerging Core Strategy have informed LCR and West Yorkshire Combined Authority (WYCA) work on the Strategic Economic Plan and West Yorkshire Plus Transport Fund.</p> <p>Ongoing discussions are being held with Network Rail and WYCA regarding the development strategy and future impacts on the rail network.</p>	<p>14</p>

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		The Council has confidence that future capacity issues for both road and rail, arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.	
TR1 (A)	10. The Transport Study (produced by SDG) recommended a focus on making best use of the existing rail services on the Wharfedale line, and specifically, encouraging modal shift to rail from car, but it has already been recognised that the rail network in Wharfedale is running at capacity.	The Council is working with Network Rail and WYCA to explore opportunities to increase peak period capacity on the Wharfedale Line into and out of Leeds in the medium to long term. In addition the Plan seeks to focus job creation in central Bradford will take up some spare capacity on the line to Forster Square.	116
TR1 (A)	11. Proposed new housing will have major impacts on the already congested transport network particularly the A65 and particularly in Wharfedale settlements with stations. (Both the Transport study undertaken by Steer Davies Gleave SDG and a study by Met Engineering conclude that the A65 is already congested and that further development in the corridor will only worsen the situation)	The Transport Study identifies the A65 as a corridor where traffic levels are likely to increase and the impacts of this will be considered. However, the study identifies other transport corridors across the District where traffic levels are higher and increases during the plan period would be greater. The Council has confidence that future capacity issues for both road and rail, arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures. The Council is working with Network Rail and WYCA to explore opportunities to increase peak period capacity on the Wharfedale Line into and out of Leeds in the medium to long term The location of new development will aim to maximise opportunity for travel by sustainable modes	111 116
TR1 & infrastructure	12. The Local Infrastructure Plan contains a raft of proposed public transport schemes. The proposals intended to improve public transport access to Bradford City Centre and to improve connectivity between Bradford and Leeds and between Bradford and Huddersfield. Dialogue is needed to establish	TR1 sets out the broad principles to achieve a framework for development across the District and is compliant with National Planning Policy Guidance. Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region	161

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	<p>the scale of mode shift and the benefit to the M606, M62, and M621 motorways of this investment in public transport.</p> <p>The principles underlying Policy TR1, the Infrastructure Schedule in the LIP identifies as 'desirable' a high quality public transport route (tram, train or NGT bus) between M606/Low Moor/Euroway, Bradford City Centre and Shipley.</p>	<p>Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The Core Strategy will be used to inform infrastructure partners longer terms investment decisions.</p> <p>The Council is actively engaged with the Highways Agency, adjacent Local Authorities and WYCA under the Duty to Co-operate to identify appropriate mitigation measures to address impacts of the Plan on the strategic road network and to share evidence and information. In particular it will work closely as part of the Allocations DPD in determining any site allocations and related infrastructure requirements and will liaise with HA on the implications of impact on the motorway infrastructure, including safety factors and traffic congestion.</p>	
TR1 & infrastructure	13. The Plan should propose a programme of funded transport infrastructure improvements linked to provision of new housing.	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The Core Strategy will be used to inform infrastructure partners longer terms investment decisions</p> <p>Further work will be undertaken as part of the more detailed site allocations work to determine more local improvements and mitigation.</p> <p>The Council has confidence that future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation</p>	111

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		measures.	
TR1 & infrastructure	<p>14. The emphasis on housing and employment development pushing ahead in outlying areas will create avoidable stresses in the transport infrastructure and generate an increase in car journeys.</p> <p>In particular concerns over the highways infrastructure around Bingley which is a network of lanes and traditional estate roads</p> <p>Development will bring increased car usage, an enlarged carbon footprint, and reduction in air quality which is all at odds with the key ambitions of the Draft and the NPPF.</p>	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The Core Strategy will be used to inform infrastructure partners longer terms investment decisions</p> <p>Further work will be undertaken as part of the more detailed site allocations work to determine more local improvements and mitigation.</p> <p>The Council has confidence that future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>There are plans to increase the capacity of the Airedale Rail Line and the park and ride facility at Crossflatts has recently been extended, There are also plans to extend the P&R at Steeton/Silsden</p> <p>Bus corridor improvements have recently been implemented on the A650 and the Airedale Greenway which uses the Leeds and Liverpool Canal to link towns and services along the corridor by a high quality cycle route was also developed over recent years. This route is being extended to Leeds and may also be extend in the other direction to Silsden and the District boundary.</p> <p>The future location of developments is considered carefully to ensure that access to sustainable transport modes is</p>	483

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		maximised	
TR1 & paragraph 5.2.10	15. Bradford Council should work with Leeds to investigate transport solutions on the A65 / A660 and question the practicality of the number of houses proposed by Leeds Council and Bradford Council in the Wharfedale area.	<p>The Council is actively engaged with Leeds City Council, other adjacent Local Authorities, WYCA, the Highways Agency and Network Rail under the Duty to Co-operate to identify appropriate mitigation measures to cross boundary transport issues</p> <p>The Council has confidence that future capacity issues for both road and rail, arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The location of new development will need to maximise opportunity for travel by sustainable modes.</p> <p>The Duty to Cooperate Statement sets out more information on strategic planning approach to transport.</p>	116
TR1	<p>16. There is an absence of bus links with Bradford; and existing parking issues within Burley in Wharfedale and within the vicinity of stations throughout Wharfedale.</p> <p>While the intention to achieve some change in journeys from car to cycle is welcomed there is a need for this to be addressed now before any further increases are implemented; including sympathetic support for the proposed Wharfedale Greenway cycle and pedestrian route from Pool to Burley using</p>	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The Council continues to work with WYCA and bus operators to identify options for improving bus connections – in some cases increased development facilitates the provision of new and improved services</p>	445

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	the thread of the former railway track with an additional link to Ilkley.	<p>Increased Rail Park and Ride provision in the corridor is planned for Menston.</p> <p>The Council is actively engaged in work to develop a Wharfedale cycle route and will be working with partners on this to try to identify a funding package</p>	
TR1	17. The overall aims and content of this policy are supported along with the use of accessibility modelling and mapping techniques to plan sustainably for larger scale developments.	Noted.	447
TR1 (A)	18. Concern over the proposals to build 1,800 new homes on Greenbelt land in the Tong/Westgate Hill area. Without additional highway capacity this would add further congestion to an already badly congested area.	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The Council has confidence that future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>The highway implications of any development at Tong St / Westgate Hill / Holme Wood are being investigated and it would be intended to address congestion issues through this work.</p> <p>The planned housing growth in South East Bradford will see the creation of an urban extension at Holme Wood which will be supported by improvements to the highway network infrastructure to provide access to the urban extension and improve connections to the Motorway network and communities in Leeds and South East of Bradford. Improvements will also be made to the walking and cycling</p>	185

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		network. Other proposals for improvements to transport systems affecting developments in Bradford can be found in Core Strategy Sub Area Policy BD1 section F.	
TR1 (A)	19. Endorse and support the aims in TR1 A:	Noted	445
TR1 (B)	20. The Transport Study (Produced by SDG) stated it would be difficult to reduce bus journey time or journey variability, because of the limited opportunities of providing Bus Priority	The Highways Efficiency and Bus Package being developed through the West Yorkshire Plus Transport Fund is seeking to develop a more holistic approach to transport corridors than has previously been the case. It is recognised that opportunities for the provision of conventional bus lanes is limited on some corridors and so other techniques such as bus priority at traffic signals and reviewing congestion hot spots on a corridor are also being used.	116
Policy TR2	Parking Policy		
TR2	1. There are ongoing problems of on street parking near to rail stations in particular around Menston Station due to car parking capacity currently which causes problems for the residents.	Increased Rail Park and Ride provision in the Wharfedale corridor is planned for Menston.	135 342
TR2	2. There are already serious parking issues in Burley both in the village centre, main street and adjacent to the rail station. The issues around the station are already acute and need to be addressed prior to any developments. Furthermore it is most unlikely that residents in any new developments at the periphery of the village will walk or cycle to the station. The documents vision to increase cycling to the station is welcomed but this will be difficult to achieve in practice.	A Wharfedale cycle route is in development and will provide links to Burley in Wharfedale rail station but the parking situation here is acknowledged – there may be a requirement for future traffic management measures to address this. However it must be stressed that the scale of proposed new development in Burley is relatively small.	445
TR2 (B)	3. Parking Policy TR2B aims to reduce long stay parking in town centres other than in the vicinity of railway stations in order to encourage the use of rail as a sustainable transport mode. Unfortunately, applying this policy to Wharfedale, though desirable in its self, could have the unintended effect of reducing the use of the railway by commuters.	Parking provision at stations will be the subject of ongoing review by WYCA and Bradford Council. Increased Rail Park and Ride provision in the Wharfedale corridor is planned for Menston.	116

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	<p>Parking at the stations in Ilkley, Ben Rhydding, Burley-in-Wharfedale, Menston and Guiseley (in Leeds) is limited, with little opportunity of expansion, and increased use of the streets for commuter parking.</p>		
TR2 (B & D)	<p>4. The free bus service to the station from High Royds is about to be withdrawn. Policy TR2 advocates use of public transport to stations and the introduction of park and ride facilities for town centres but fails to address parking issues adjacent and beyond stations other than the introduction of charges.</p> <p>It is consider that the policy should include a statement that development should not take place where the developers cannot demonstrate a long term solution to the extra parking in and around railway stations arising from development proposals, in areas where car parking is already a significant problem.</p>	<p>Increased Rail Park and Ride provision in the corridor is planned for Menston</p> <p>The Council has confidence that any future capacity issues for both road and rail (including parking), arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>Further work will be undertaken as part of the more detailed site allocations work to determine more local improvements and mitigation.</p>	<p>135 342</p>
TR2 (D)	<p>5. Provision of park and ride facilities in line with Policy TR2D may be desirable but, given land values in Wharfedale, is unlikely to be financially viable. There are no recommendations as to how this aspiration can be achieved and with respect to the highly congested situations in Menston and Burley is unlikely to be the solution to the transport problems. Also, because of the professional nature of much of the employment the return journey often can be late in the evening which would require the Scheme to operate for long and probably uneconomic hours.</p>	<p>Increased Rail Park and Ride provision in the Wharfedale corridor is planned for Menston.</p> <p>The Council has confidence that any future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>Further work will be undertaken as part of the more detailed site allocations work to determine more local improvements and mitigation.</p>	<p>116 135 342</p>
TR2 (D)	<p>6. Policy TR2 provides support for the provision of a bus and rail park and ride facilities, whereas the Infrastructure Schedule does not contain any detail</p>	<p>New Rail Park and Ride (P & R) provision is currently planned at the proposed Low Moor and Apperley Bridge stations and at the existing Frizinghall Stations. There are</p>	<p>161</p>

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	<p>on the park and ride sites.</p> <p>The mode shift associated with the implementation of a high quality public transport route supported by park and ride car parks can result in significant changes to travel patterns as motorists change their routes to access the park and ride car parks.</p> <p>The Highways Agency (HA) welcomes park and ride in principle but is concerned that, if a high quality public transport route is provided in combination with a park and ride facility in the M606 corridor, there could be an adverse impact on the safe and efficient operation of the M606 motorway given the demands that are to be placed on it by traffic generated by housing and employment development proposals.</p>	<p>also plans to extend P&R at Steeton/Silsden, Menston and Shipley Stations.</p> <p>There are no plans for bus P&R currently, as the introduction of attractive direct P&R into the City Centre is not yet economically viable due to low parking costs. This will however be reviewed as the City Centre regenerates and land continues to be protected for a P&R facility at Odsal. Discussions would be held with the HA should this, or any other project affecting the M606, be progressed.</p>	
TR2 (D)	7. Rail and bus based park & ride facilities would be appropriate for Ilkley provided that additional land were available near to the railway/bus station to accommodate this facility.	There are currently no plans for Park and Ride or additional parking at Ilkley Station	170
TR2 (D)	8. Objection to the wording of sub policy D regarding the provision of additional bus and rail park and ride facilities insofar as this seeks to limit park and ride provision where there may be an existing capacity problem on the rail network. This policy is currently unjustified by evidence and should be positively reviewed in a context of seeking to improve the performance of the rail network in terms of quality and carrying capacity (see also policy TR3 D).	<p>It is not the intention of TR2D to limit park and ride provision to stations where existing capacity problems exist. The Policy states that park and ride facilities will be appropriate where they are financially viable, and support the use of public transport and help reduce congestion. The Policy is worded to state that any provision of park and ride on the rail network does not add to existing capacity problems.</p> <p>Policy TR2 seeks to improve the performance of and access to parking at rail and bus stations.</p>	447
TR2 (E)	9. Introducing charges at Menston train station car park will make little difference to the capacity problem other than worsen the parking in the surrounding area.	There are no current plans to charge for parking at Menston rail station. Policy TR2 (E) is required in its current form to retain flexibility in future parking policy and strategy decisions.	135

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TR2 / Wharfedale	10. Not enough parking in Ilkley and Addingham (including town centre retail needs, car parks, on street parking, train commuter parking and parking for homes)	<p>Parking strategies are a key element in the suite of measures the Council can use to effect modal shift and manage demand. The availability of car parking can be a major influence on travel choices, and the Core Strategy has an important role to play in ensuring parking policies across the District support the wider spatial strategy of effecting a change to sustainable travel modes. In developing demand management and parking strategies, including car parking standards, there has been a need for the Council to do so in manner consistent with neighbouring authorities, in order to avoid undermining their policies.</p> <p>Appendix 4 of the Core Strategy sets out indicative parking standards for the District, allowing flexibility in how the parking standards are employed to maximise sustainable travel.</p> <p>The limited scale of development in Ilkley and Addingham is unlikely to have a significant impact on parking availability.</p>	2, 3, 6, 7, 8, 9, 10, 11, 15, 18, 19, 20, 21, 22, 23, 27, 30, 31, 32, 48, 51, 57, 67, 72, 74, 87, 93, 96, 104, 107, 120, 125, 131, 132, 133, 139, 140, 141, 142, 146, 150, 158, 163, 169, 178, 183, 197, 211, 217, 218, 219, 220, 221, 222, 223, 224, 225, 227, 228, 229, 230, 231, 233, 236, 238, 241, 242, 243, 245, 247, 248, 249, 250, 251, 252, 255, 257, 258, 259, 260, 261, 262, 265, 266, 267, 268, 274, 275, 278, 280, 281, 283, 285, 286, 287, 289, 290, 294, 295, 297, 300, 301, 303, 304, 307, 311, 312, 313, 314, 316, 317, 319, 320, 322, 325, 326, 328, 330, 332, 333, 334, 335, 337, 341, 344, 346, 347, 360, 362, 363, 367, 368, 370, 372, 395, 398, 404, 405, 418, 441, 449, 450, 454, 459, 460, 465,
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			467, 469, 470, 471, 472, 473, 480
TR2	10a. While the intention to comply with parking standards is stressed, the provision of adequate numbers of spaces is not made, nor is it apparent where the land might become available. Without it, the proposed modal shift to public transport will surely be compromised with commuters being unable to park close to rail/bus terminals (the prevailing wisdom being that commuters are generally unwilling to walk further than around 400 metres to public transport) and the inevitable consequence being that many will opt to travel by car adding to congestion.	<p>The Council has confidence that any future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>Further work will be undertaken as part of the more detailed site allocations work to determine more local improvements and mitigation.</p> <p>Increased Rail Park and Ride provision in the Wharfedale corridor is planned for Menston and Ben Rhydding.</p> <p>There are also plans to extend P&R at Steeton/Silsden and Shipley Stations.</p>	74
TR2 / Wharfedale	11. No provision for a park and ride	The Council and WYCA will review requirements for P&R facilities throughout the Plan period	74, 307
TR2 / Wharfedale	11a. Park and ride in Addingham (near by-pass) is required	The Council and WYCA will review requirements for P&R facilities throughout the Plan period	92
TR2 / Wharfedale	11b. There should be a park and ride for Ben Rhydding station	Increased Rail Park and Ride provision in the Wharfedale corridor is planned for Menston and Ben Rhydding.	278
Policy TR3	Public Transport Cycling and Walking		
TR3 (C & D)	1. There is reference to Rail Plan 7 but this contains a mix of funded interventions and future aspirations. It is not clear how this links to the Yorkshire Rail Growth funding and how this is being managed.	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development.</p> <p>The Core Strategy will be used to inform infrastructure partners longer terms investment decisions.</p>	14
Policy TR4	Transport and Tourism		
TR4	1. Support for tourism has already been addressed	Noted	170

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	as the second planning corner stone for Ilkley. It is agreed Ilkley should not be adversely affected by the impact of transport whilst at the same time attempting to encourage both day and staying visitors.		
TR4 (A & D)	2. Support Policy TR4 which seeks to improve access by sustainable modes of transport to the main tourist destination of the District (especially TR4 (A) and TR4 (D)).	Noted.	103
TR4 (D)	3. The Trust supports the inclusion within section D of the Policy to support the maintenance and development of the waterways and towpaths through planning and development decisions. Such a Policy will seek to improve access to the canal and towpath.	Noted	165
TR4 / Ilkley	4. A65 congestion - Not clear what measures are being encouraged to increase tourism/visitor numbers	There is a very strong emphasis in TR4 on ensuring that new and improved tourist attractions and facilities can be accessed by sustainable transport modes. As one example the proposed Wharfedale cycle route will provide an attractive route between towns and villages in the valley linked to rail stations. Tourism related trips are generally made outside peak periods and so impact on congestion on A65 from any additional car trips will be limited	7, 8, 17, 73
Policy TR5	Improving Connectivity and Accessibility		
TR5	1. "Improving Connectivity and Accessibility" indicates the ability of the District's Highway, Rail and Bus Networks should be protected and enhanced, including routes to provide access to LBIA. LBIA supports the district's focus on safeguarding	Noted	487

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	the potential to deliver improved connectivity to the airport.		
TR5 / Wharfedale	2. Poor transport system discourages real growth in new employment in lower Wharfedale	<p>Core Strategy Policy TR5 aims to protect and enhance all Highway, Rail and Bus Networks to provide efficient and affective travel throughout the District. The Policy supports improvements to transport provision in the more isolated and poorly serviced areas of the district.</p> <p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p> <p>The Core Strategy will be used to inform infrastructure partners longer terms investment decisions</p>	74, 342
TR5 / Wharfedale	2a. A65 (which has to travel through centre of Ilkley) is at / over capacity.	Although improvements to highways and their junctions can be made it unlikely that significant extra highways capacity can be provided on the A65. Therefore the Core Strategy includes policy TR1 which aims to reduce the demand for travel, encourage and facilitate the use of sustainable travel modes, limit traffic growth, reduce congestion and improve journey time reliability.	2, 7, 8, 10, 11, 12, 17, 18, 20, 21, 22, 23, 24, 27, 30, 31,32, 35, 38, 39, 47, 51,57, 59, 61,67, 70, 72, 74, 87, 88, 92, 93, 96, 97, 104, 107, 110, 111, 115, 116, 118, 125, 131, 132, 133, 137, 138, 139, 140, 141, 142, 143, 146, 148, 149, 150, 151, 153, 154, 155, 158, 163, 169, 170, 171, 177, 180, 183, 184, 197, 198, 199, 204, 211, 217,

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			218, 222, 224, 229, 236, 237, 245, 254, 263, 265, 267, 268, 272, 273, 274, 276, 277, 279, 280, 285, 290, 301, 302, 303, 305, 306, 307, 309, 311, 312, 315, 316, 317, 318, 319, 320, 321, 323, 324, 325, 326, 327, 330, 333, 334, 336, 337, 342, 344, 347, 349, 351, 357, 358, 359, 362, 363, 367, 368, 369, 370, 372, 376, 377, 378, 384, 385, 391, 392, 395, 398, 404, 410, 418, 426, 500, 505, 516, 518
TR5 / Wharfedale	2b. Transport Study highlights the A65 was incapable of significant expansion	Although improvements to highways and their junctions can be made it unlikely that significant extra highways capacity can be provided on this already congested corridor (A65). Therefore the Core Strategy includes policy TR1 which aims to reduce the demand for travel, encourage and facilitate the use of sustainable travel modes, limit traffic growth, reduce congestion and improve journey time reliability.	25, 74, 104, 107, 116, 131, 155, 357, 368, 372, 404
TR5 Wharfedale	2c. Addingham village streets are congested and parking and other facilities are under too much pressure	Core Strategy Policy TR5 aims to protect and enhance all Highway, Rail and Bus Networks to provide efficient and affective travel throughout the District. The Policy supports improvements to transport provision in the more isolated and poorly serviced areas of the district. Core Strategy Policy TR1 will help towards reducing the pressure on the road networks and provision of car parks by	175, 213, 464

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		encouraging a reduction in demand for travel, encouraging and facilitating the use of sustainable travel modes, limiting traffic growth, reducing congestion and improving journey time reliability.	
TR5 / Wharfedale	3. Ironically, when so much emphasis is being rightly afforded to the protection of the local South Pennines Moors SPA habitats, the congestion on the A65 regularly leads to a rat-run of traffic along the higher, and broadly parallel, Moors Road route which runs alongside the SPA edge – such use of this narrow, unclassified route will undoubtedly increase and further impact upon protected habitats.	Core Strategy Policy TR1 aims to reduce the demand for travel, encourage and facilitate the use of sustainable travel modes, limit traffic growth, reduce congestion and improve journey time reliability. In deciding where to make road improvements the Council will continue to investigate amounts of traffic using individual roads throughout the District and the impacts road usage on local environments.	74
TR5 / Wharfedale	4. By-pass needed for Ilkley	A bypass for Ilkley has been previously considered but recognised as being environmentally damaging to the natural environment in Wharfedale. Policy TR1 aims to reduce the demand for travel, encourage and facilitate the use of sustainable travel modes, limit traffic growth, reduce congestion and improve journey time reliability.	256, 357
TR5 / Wharfedale	5. Poor public transport links (particularly to Bradford)	Within Wharfedale the Council considers Rail Services and station catchments to be adequate and that a good service is accessible and available to most residents. The Council has confidence that future capacity issues for both road and rail, arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures. The Council continues to work with WYCA and bus operators to identify options for improving bus connections – in some cases increased development facilitates the provision of new and improved services Core Strategy Policy TR5 aims to protect and enhance all Highway, Rail and Bus Networks to provide efficient and	3, 6, 17, 25, 88, 133, 304, 342, 352, 360, 362, 364, 405, 411, 449, 450, 453

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		<p>effective travel throughout the District. The Policy supports improvements to transport provision in the more isolated and poorly serviced areas of the District.</p>	
TR5 / Wharfedale	5a. Public transport system over stretched	<p>Within Wharfedale the Council considers Rail Services and station catchments to be adequate and that a good service is accessible and available to most residents. The Council has confidence that any future capacity issues for both road and rail, arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>The Council continues to work with WYCA and bus operators to identify options for improving bus connections – in some cases increased development facilitates the provision of new and improved services</p> <p>Core Strategy Policy TR5 aims to protect and enhance all Highway, Rail and Bus Networks to provide efficient and affective travel throughout the District. The Policy supports improvements to transport provision in the more isolated and poorly serviced areas of the district.</p>	<p>35, 59, 63, 72, 74, 87, 88, 118, 125, 286, 287, 297, 318, 337, 341, 342, 347, 362, 368, 370, 377, 378, 383, 384, 385, 410, 418, 450, 471, 501</p>
TR5 / Wharfedale	5b. Rail links at capacity and overcrowding	<p>Within Wharfedale the Council considers Rail Services and station catchments to be adequate and that a good service is accessible and available to most residents. The Council has confidence that any future capacity issues for both road and rail, arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>Core Strategy Policy TR5 aims to protect and enhance all Highway, Rail and Bus Networks to provide efficient and affective travel throughout the District. The Policy supports improvements to transport provision in the more isolated and poorly serviced areas of the district.</p>	<p>2, 7, 8, 10, 12, 15, 18, 19, 20, 21, 23, 25, 27, 30, 31, 32, 48, 59, 61, 67, 72, 74, 87, 88, 96, 116, 118, 131, 132, 133, 139, 143, 148, 149, 150, 151, 153, 154, 155, 158, 169, 171, 177, 180, 183, 184, 197, 198, 199, 204, 217, 222, 225, 229, 230, 236, 247, 257, 258, 259, 260, 261,</p>

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TR5 (A & D)	6. The Plan should recognise the importance of Keighley & Worth Valley Railway (KWVR) as a public transport Gateway to Haworth.	The Core Strategy does recognise the important role played by The KWVR in providing links from Keighley to locations and communities along the Worth Valley, but there are no current plans to incorporate this formally into the public transport service.	114, 371
Policy TR6	Freight		
TR6	1. TR6 addresses freight transport and the principles contained in the policy are generally acceptable to the Highways Agency. There is concern in relation to Criterion B. about employment development in the M606 corridor and South East Bradford has been detailed in the comments on proposed Policies BD1 and EC3. The issue is that the statement in item B does not make any reference to the constraints of highway capacity and safety.	The Council will continue to work with Highways Agency under the Duty to co-operate to share evidence and information. In particular it will work closely as part of the Allocations DPD in determining any site allocations and related infrastructure requirements and will liaise with HA on the implications of impact on the motorway infrastructure, including safety factors and traffic congestion.	161
TR6 (B)	“Freight” indicates that planning and development decisions and transport policies should “...encourage the location of storage/distribution development with high levels of freight and commercial traffic close to intermodal freight facilities, airports, or roads designed and managed as traffic distributors.” As indicated previously, Leeds Bradford International Airport considers that there is potential for businesses to be attracted to the airport to benefit	Noted.	487

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	from the international connectivity it provides. This may include freight, in particular small, high value freight which can be accommodated within existing passenger aircraft.		
Policy TR7	Transport Investment and Management Priorities		
TR7	1. Policy proposes prioritisation of schemes. With the exception of priority D we would suggest that the differentiation between categories A, B and C may not be justified in many cases whereas a cost benefit and return on capital invested approach would be more appropriate. Given the central significance of transport infrastructure to the delivery of all the Core Strategy key spatial and growth policies (including the sub area policies) it is essential that a full set of transport projects and priorities are added to policy TR7 before it is finalised. These should be clearly established in this policy and at the heart of the Core Strategy and not left solely to a listing in the Local Infrastructure Plan. This policy needs to be strong, clear and fully comprehensive in order to form a sound basis for funding bids and private sector contributions where appropriate.	The prioritisation approach proposed in the Policy is considered robust and is consistent with and supportive of the general national and local approach to transport network and asset management. Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development. It is not considered necessary to incorporate proposals in these documents in the Local Plan as they have been informed by it and are thus closely aligned	447
Appendix 4	2. Appendix 4 for Car Parking Standards does not include the sui generis category and therefore ignores Bradford's theatres.	Noted. If and when car parking issues arise relating to any of land uses contained within the Sui Generis category of the Use Classes Order they will be dealt with on their individual specifications and considerations such as number of potential users and proximity to public transport etc. The Core Strategy does not have the scope to contain parking standards to cover every possible proposal, location and intensity of use which may come forward during the plan period	126

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	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue)</i>	Council’s Response	Respondent
KEY OBJECTIVES			
Section 5.3 / Para 5.2.3	Paragraph 5.2.3 sets out key objectives – the plan is unsound because it does not mention sustainability.	Firstly the objector is presumably actually referring to paragraph 5.3.3 Secondly the point made is not valid. The paragraph is not referring to the vision and objectives of the Core Strategy but making a factual reference to the actual vision and key objectives contained within the Council’s new Housing and Homelessness Strategy. So the paragraph cannot be amended as requested. Thirdly, the plan in totality includes multiple references to sustainability, sustainability is embedded throughout the plan, and there is a specific policy P1 relating to the presumption in favour of sustainable development. Finally the Council would point out that following the paragraph which the objector refers to the housing chapter sets out the 10 principles which are intended to secure sustainable housing growth.	192
THE 10 PRINCIPLES FOR ACHIEVING SUSTAINABLE HOUSING GROWTH			
1. Support for the 10 Principles.	1. General support in particular for the prioritising, wherever possible, the re-use of previously developed land and buildings.	Support noted.	103, 123, 188, 431
1. Support for the 10 Principles.	2. We strongly support these principles for sustainable housing growth	Support noted.	394
1. Support for the 10 Principles.	3. Yorkshire Water strongly supports “the phasing the release of land to ensure that housing growth is co-ordinated with planned infrastructure provision and to encourage the take-up of brownfield land in the most sustainable locations while ensuring delivery of housing targets in line with a published housing trajectory”. The approach is line with PPG which states that plan making may need to consider “phasing new development so that water and waste water infrastructure will be in place when needed”.	Support noted	123

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2. Objections to the 10 Principles	1. NPPF para 14 starts from the presumption in favour of sustainable development and para 47 of NPPF explains how to boost housing supply and a wide choice of homes. The 10 principles in HO1 do not reflect how the housing market works especially in the current economic environment. Not consistent with national policy, not justified, not sound.	The Core Strategy starts from a presumption in favour of development as set out in Policy P1. The Housing chapter of the plan puts forward a programme for very significant housing growth and the 10 Principles begin by identifying how that growth will be achieved and managed in a sustainable way. The Council considers that the Principles fully reflect the NPPF and are therefore both justified and sound.	108
2. Objections to the 10 Principles	2. Objections to Principle 2 which seeks to prioritise, wherever possible, the use and recycling of previously developed land and buildings. This wording is not consistent with national policy which at paragraph 111 seeks to encourage rather than prioritise the effective use of land by re-using land that has been previously developed	The Council considers that the second principle is entirely consistent with the NPPF. The issue of whether the plan should include a policy provision to prioritise the use of previously developed land is discussed and responded to in detail under Policy HO6.	105, 396, 397, 400, 402
2. Objections to the 10 Principles	3. Objection to Principle 4 which relates to phasing of land release for infrastructure and take up of brownfield land	The Council considers that the fourth principle is entirely consistent with the NPPF. The issue of whether the plan should include a policy provision to phase the release of housing land is discussed and responded in detail under Policy HO4.	105
2. Objections to the 10 Principles	4. Objection to Principle 6 - ensuring inclusion local carbon technologies and renewable energy generation. The Council's viability study does not support such requirements. The government's review of standards is also seeking to ensure energy requirements are solely included in the Building Regulations.	The need to mitigate the impacts of climate change, the district's challenging carbon reduction target and large population growth justify setting a local requirement for sustainable housing in Policy HO9 in accordance to NPPF paragraphs 93-95. NPPF paragraph 95 requires any local requirement for a building's sustainability to be consistent with the Government's zero carbon buildings policy and adopt nationally described standards The costs of the Zero carbon are included in the Local Plan Viability Assessment update.	105
2. Objections to the 10 Principles	5. Objection to Principle 9 - the principles for achieving sustainable housing growth should have	The principle is appropriately worded and then backed up by the content of Policy HO10. The targets for the reduction in	

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	a more vigorous policy of bringing into use empty properties in the district so as to significantly further reduce and off-set the number of new houses required.	the number of empty homes are reasonable and achievable	
2. Objections to the 10 Principles	6. The Bolton Woods Quarry site should be more specifically acknowledged within the context of this primary policy objective given its individual characteristics which fulfil all of these requirements.	Figure HO1 sets out broad principles and it would not be appropriate to list specific sites which may or may not accord with these principles. These are matters which will be considered in full within the Allocations DPD.	407
POLICY HO1 – THE DISTRICT’S HOUSING REQUIREMENT			
Policy HO1 - Support for the proposed level of housing growth.	1. The proposals are acceptable to Kirklees. Once the current city region exercise to identify consistent and comparable housing requirements for each district has been completed there may be the need for discussion to reconcile Bradford’s and Kirklees’ proposals under the duty to co-operate.	Support noted. Since the publication of the Core Strategy and the submission of this representation, the Leeds City Region have commissioned Edge Analytics to produce a methodology for consistent assessment of housing need and this is forming the basis for Local Authorities in the City Region to produce new objective assessments or update their current ones. Edge Analytics have reviewed the work carried out already by Local Authorities and recommended actions where further work is required. Edge Analytics have reviewed the work commissioned by Bradford Council in 2013 and found that work to be broadly consistent with the new LCR wide approach. They recommended a number of updates of core scenarios to reflect the availability of 2011 census data, newer 2012 based population projections and more up to date outputs from the Yorkshire & Humber Regional Econometric Model (REM). This work has been duly commissioned and completed and has shown that the annual housing target put forward within the CSPD aligns with the evidence and the updated assessment carried out by Edge Analytics. The Council have continued an ongoing process of discussion with other Local Authorities within the City Region on housing matters including housing targets and the nature and outcomes of this are outlined within the Council’s updated Duty to Co-operate Statement.	53

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Policy HO1 - Support for the proposed level of housing growth.	2. North Yorkshire County Council supports Policy HO1 which seeks to allocate sufficient land to meet the objective housing need for the District up to 2030. This approach minimises potential cross-boundary issues for the County Council in its role as upper tier authority and infrastructure provider in Craven and Harrogate Districts	Support noted.	190
Policy HO1 - Support for the proposed level of housing growth.	3. CRUVL supports Policy HO1 and the overall housing requirement of 42,100 homes over the plan period proposed by the Council which will facilitate the scale of new development as set out in Table HO1.	Support noted.	510
2. HO1 - General Comments	1. The document offers a case for the overall number of new dwellings required in the Bradford District but, as in 2008 and 2012 we would continue to urge that this number is kept under review in the light of changing demographics, economic and social circumstances.	The comments are noted.	445
3. HO1 - Duty to Co-operate	1. The Council's proposed housing requirement is understated, and sufficient attention hasn't been given to the Council's Duty to Cooperate, which when considering that Leeds, Skipton, & Kirklees all have 5 year supply problems increases Bradford's obligation to bring forward sufficient land to meet the Housing needs of not just its own authority but that of the region. Sites like NW/033 will therefore be needed to make an earlier contribution to the housing supply in order to deliver and maintain a 5 year supply.	The Council has produced its Local Plan in line with the requirements under 'duty to co-operate'. All of the 3 LA's specified are preparing their own local plans, seeking to meet their own objectively assessed housing needs within their own areas and none have indicated that they are unable to do so. None have made a request for Bradford to accommodate part of their need.	182
3. HO1 - Duty to Co-operate	2. In determining an objectively assessed housing requirement the NPPG and the PAS document 'Ten key principles for owning your housing number - finding your objectively assessed needs' both identify the assessment should be based upon the most recent demographic data, a credible up to	The Council have followed this advice. It has commissioned work to ensure that the latest demographic and household projections used and the GVA and Edge Analytics Housing Requirement Studies have generated a variety of scenarios and sensitivities including one related to the latest modelling of projected economic growth in the district over the plan	105

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	<p>date Strategic Housing Market Assessment (SHMA) and the development of credible evidence based scenarios including the effects of the economic ambitions of the market area. It should also deal with any unmet requirement and cross-boundary issues.</p>	<p>period. Housing targets are emerging based on a shared and consistent methodology within the Leeds City Region and no local authority within it is proposing not to meet their objectively assessed needs nor asking Bradford to meet any of their need. Cross boundary issues are being discussed and resolved within an agreed framework within the City region and this is described in more detail in the Council's Duty to Co-operate Statement.</p>	
<p>3. HO1 - The Plan Period</p>	<p>1. Support for the proposed plan period to 2030.</p> <p>The plan period has been extended to 2030 to ensure a 15 year plan period from the date of adoption, which is expected to be 2015.</p> <p>The proposed timeframe of the Core Strategy is sound as the proposed plan period to 2030 ensures a 15 year timeframe from the proposed date of adoption. The plan period therefore accords with paragraph 157 of the NPPF, which requires that plans are drawn up over and appropriate time scale, preferably 15 years.</p>	<p>Support noted.</p>	<p>396, 397, 400, 402, 447</p>
<p>3. HO1 - The Plan Period</p>	<p>2. Objection - the plan period should be extended beyond 2030 to ensure a minimum of 15 years from the adoption of all Development Plan Documents (DPDs) which will allocate land for development. The NPPF, paragraph 157, indicates that plans should be drawn up over an appropriate timescale with a preference for 15 years. Whilst it would appear that the Core Strategy would achieve should a timescale, presuming it can be adopted during 2015, significant elements of the plan such as allocations and green belt releases are delegated to subsequent documents.</p>	<p>There is no requirement within the NPPF to tie a 15 year plan period to the expected date of adoption of an Allocations DPD. The plan cannot therefore be judged to be unsound on this matter.</p> <p>The Core Strategy makes provision for over 42,000 new houses over a 17 year time span (2013-30), planning for new urban extensions, an extensive release of land from the green belt and new growth areas in several locations. It is doing so at a time of relative economic gloom. There is no strategic justification to extend still further this already considerable plan period.</p> <p>The objection and its interpretation of the NPPF appears to be</p>	<p>105, 129, 512</p>

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		<p>at odds with the representations of housebuilders such as Barratt David Wilson Homes who have supported the plan period and stated that it is in accordance with the NPPF.</p> <p>The Council concludes that the call for an extension to the plan period is simply an attempt to increase the total housing requirement without any strategic planning policy justification for doing so.</p>	
<p>4. HO1 - Not Justified By Evidence, Not Positively Prepared</p>	<p>1. The proposed housing requirement is unsound as it is not justified by the evidence or positively prepared and will not meet the objectively assessed needs of the area.</p>	<p>The Council disagrees. The housing target has been set in relation to a robust piece of research carried out by GVA and Edge Analytics which follows Government Guidance and utilises a variety of up to date evidence. The Council has been entirely positive in the commissioning and considering this work and the setting of the housing requirement and to suggest otherwise is bizarre. Here are some examples of this positive approach:</p> <ul style="list-style-type: none"> • The Council has commissioned independent research to underpin its housing target; • It has followed the recommendations of this work; • It has, unlike some local authorities, rejected the notion of setting a target at as low a point in the consultants' suggested range as it could and instead determined what would be the most appropriate target based on the evidence and the desire to support regeneration and reflect the expected rate of jobs growth – thus the target is set at the upper end of the latest suggested range; • It has, again unlike some local authorities, sought to plan for the full objectively assessed need regardless of the current point in the economic cycle; • It has sought to plan for the full objectively assessed need despite the implications for the need for a large release of green belt to meet that need; • It has, unlike some local authorities, not ignored past under delivery and included an allowance for backlog based on the failure to meet past development plan 	<p>105, 423</p>

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		targets, and the resultant social housing waiting lists and levels of over crowding within parts of the district;	
5. HO1 (B) - How the target is expressed	1. Support received for the expression of the housing target as a minimum. This would allow for flexibility and certainty that the housing needs of the district are met.	Support noted.	105, 415
5. HO1 (B) - How the target is expressed	2. There is good reason to have an aspirational, ambitious target to meet housing need, especially for affordable housing, but since there will probably be a shortfall in delivery against that target there is certainly no need to allocate <i>more</i> land than might supply 42,100 homes	First of all the target of 42,100 new homes is not an aspirational target, it is a target based on an objective assessment of need which itself is grounded in demographic and economic projections as required by Government Guidance. Secondly the wording 'at least' reflects Government guidance to significantly boost new housing and also reflects the outcomes of EIP's across the country on this issue.	394
6. Table HO1 – Unmet Need / Backlog	1. We welcome the recognition that the Council are seeking to make good the backlog in under delivery.	Support noted.	129
6. Table HO1 – Unmet Need / Backlog	2. The HBF agrees that the backlog due to the under-delivery of 7,687 dwellings should be included within the plan. In accordance with a number of recent appeals and the NPPG this under-delivery should be dealt with in the first five years of the plan and therefore the Council will need to ensure that it has sufficient sites which can deliver immediately	The comments are noted. The Council's 5 year land supply calculation already includes in full the backlog element in line with the 'Sedgefield approach'.	105
6. Table HO1 – Unmet Need / Backlog	3. The difference between previous targets and completions gives a figure for residual unmet need 2004-2013. Whilst that unmet need may statistically exist, the Plan needs to clarify why it has arisen and then analyse the extent to which meeting that backlog is a realistic objective. For example, if the previous target for 2004-13 was too ambitious due to market conditions, especially as it covered a period of economic recession, then attempting to meet a historical shortfall against that previous	First of all the Council believes that it is right in principle for the plan to consider and then plan for any recent unmet need. The Government requires the Council to ensure that all need is met irrespective of how large or how challenging it will be to meet that need. The Housing Requirement Study only assesses the additional need which would be the result of household growth and economic change over the period 2013 to 2030. To test whether previous supply may have fallen short of need	394

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	target is impractical, and should be deemed unsound because it could not realistically be delivered during the plan period, no matter how laudable the objective of meeting housing need	<p>it is advisable to assess a range of demographic and market indicators. Within Bradford there is clear evidence of under provision by virtue of the size of social housing waiting lists and level of over crowding within parts of the urban area. However the most telling indicator is that the growth in households since 2004 (which the interim 2011 household projections estimate to be 18,238 over the period 2004-13) has far exceeded net housing completions of just 11,053 – a deficit of 7,185. The plan based backlog, which is a better indicator since it took account of a wider range of factors than pure demographic projections is therefore fairly closely aligned to the proposed allowance for backlog.</p> <p>Government guidance requires Councils to assess and then provide for the housing needs of the district. The outcome at previous EIP's such as at Kirklees has shown that it is not for the Council to reduce provision and to ignore the level of need based on an assumption of what might be delivered due to housing market conditions, mortgage availability and so on.</p> <p>Finally its is also very dangerous to attempt to use past rates of delivery to determine what can be delivered in the future, because those past rates of delivery will have reflected entirely different circumstances not least a very much smaller level land allocations.</p>	
7. Table HO1 - Vacant Dwellings Allowance	1. The assumptions concerning bringing empty homes back into use are supported in policy terms by the NPPG and can be justified by the Council through evidence of high and sustained levels of refurbishments across Bradford in recent years. We therefore have no issue with this assumption.	Support noted.	489, 495
7. Table HO1 - Vacant Dwellings Allowance	2. The 3,000 target is overly ambitious. No evidence has been given to show that this can be achieved. The Council have no policies to encourage the re-use of vacant properties.	The allowance made for reduction in vacant homes is not over ambitious as indicated by the progress already recently made in reducing vacant homes which has placed Bradford as one of the best performing local authorities in the country on this	105, 129, 437, 512

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		<p>issue.</p> <p>Moreover the Council does have a delivery strategy, policies and proposals to achieve the 3000 reduction which is referred to in the Core strategy and which available online on the Council's Housing Service web pages. Evidence has therefore been provided that the reduction can be achieved.</p> <p>Finally while certain objectors such as the HBF do not consider that evidence has been provided to justify the proposed allowance and likelihood that those will be achieved it should be noted that this is not a view shared by CEG Land Promotions Ltd, Persimmon Homes (West Yorkshire, Barratt David Wilson Homes - Yorkshire West Division, or Redrow Homes (rep no 489 & 495)</p>	
7. Table HO1 - Vacant Dwellings Allowance	3. Unless the empty properties have been taken out of the overall supply of housing in Bradford, the Council should not seek to reduce the overall requirement on the basis they are being brought back into use as this will effectively double-count these properties.	The Council does not consider that the allowance would amount to double counting. This is firstly because the calculation of housing need within the Housing Requirement Study is not a housing stock based calculation and secondly because a large proportion of the vacant homes are long term vacants which have not contributed to meeting need for a significant period.	
7. Table HO1 - Vacant Dwellings Allowance	4. The claimed figures for vacant properties may in fact be second homes.	The Council can confirm that the figures quoted are vacant properties and are not second homes.	
7. Table HO1 - Vacant Dwellings Allowance	5. Vacant units already form part of the housing land supply and are part of the natural churn of the market. Without such units the market would not function. It would therefore be wrong to argue that the bring back into use of these units will reduce the housing requirement.	The Council accepts that a certain level of short term vacancies – usually assumed to be 3% - is needed to ensure that the housing market can function properly. However the proposed reduction is targeted mainly at long term vacant homes and the planned reduction of 3000 would still leave a level of vacant properties above this 3% level and therefore the objectors comments and concerns are not valid.	129

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		Moreover we would point out that the acceptance of the need to ensure the housing stock has a level of vacancy is indicated by the fact that the proposed annual housing targets figures put forward in the Housing Requirement Study, and accepted by the Council, have been adjusted upwards by approximately 3%.	
7. Table HO1 - Vacant Dwellings Allowance	6. The target for reduction in empty homes is set too low. Table HO1 p.157 contains an allowance of 3,000 for reduction in vacant homes a mere 170 a year 2013 to 130. Paras 5.3.156-160 p194 address this horrendous issue -the total number of empty homes in the district at October 2012 was 9,731(4.6% of the district stock) of which 5,413 were empty for longer than 6 months.	The targets for the reduction in the number of empty homes are reasonable and achievable and reflect the Council's Housing Strategy, policies and programmes.	170, 191
8. HO1 - Detailed comments relating to Table HO1	1. Table HO1 does not take account of para 47 NPPF and is fundamentally flawed. The background documents (SHLAA, SHMA and AMRs) show that over at least the last 5 years Bradford Council have not met their housing delivery targets. In such cases para 47 of NPPF makes it very clear that a 20% buffer should be moved forward from later periods of the plan yet your calculations show a 10% decrease in overall housing numbers compared to the last CS consultation and also then spread the housing shortfall over the full CS plan period mainly in the mid-term rather than the 0-5 years as required by NPPF and a stance that has been supported in a significant number of recent planning appeal decisions across England. It seems the 5 year HLS calculations have used the residual rather than Sedgefield method.	Firstly the objection is flawed as the sole purpose of the table is to set out the housing requirement calculation for the total plan period – it is not setting out the rate of delivery or land release within the plan period. The principle of a 20% buffer to reflect past under delivery is therefore irrelevant as the Government makes it clear that this buffer is not an addition to the total land supply or housing requirement. It is also ludicrous to suggest that the table and its calculation is flawed simply because it results in a reduction in the target as compared to the CSFED. The reduction relates to the updated evidence. Finally although again not relevant to the table itself, its should be pointed out the 5 year land supply calculation within the SHLAA does use the Sedgefield method, contrary to the suggestion made in this representation.	108
9. HO1 - Housing Stock Loss incl Clearance	1. Objections have been made to the absence of a specific allowance for housing stock loss over the plan period. Specific points made include:	The first point to make is that the Council are not reserving the principle of including an allowance to be made for loss of stock to the Allocations DPD, merely the scale and distribution	129, 437

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	<ul style="list-style-type: none"> • There is the potential for no allowance to be made; • Suggestion that there must be evidence to suggest what future clearance programmes are planned and what past and historic rates of loss have occurred; • It is inappropriate to leave this matter to the Allocations DPD; • It is therefore unclear what evidence will be available at the time the Allocations DPD is produced which is not available now. 	<p>of that allowance. There is therefore no possibility as one objector suggests that no allowance might be included in the Local Plan. Policy HO1 makes it very clear that an allowance for future clearance will be included in the Allocations DPD and that housing allocations will need to be adjusted upwards accordingly.</p> <p>Secondly it is strange that the objector cannot appreciate that there will be particular uncertainty at the present time over future levels of clearance and re-use of buildings given the ongoing restraints on public sector funding and changes in government policy. Rates of demolition and clearance are very sensitive to a range of factors including overall economic conditions and the supply of finance since clearance programmes have to be funded. Past rates of clearance will not necessarily be indicative of future clearance programmes. It is a fact that the consultants GVA tried to but failed to gain any information from RSLs on their future clearance programmes.</p> <p>The Council considers that future clearance programmes will provide a key element of any allowance calculation and that it may be possible to get a clearer assessment of the likely scale of those programmes over the next 2-3 years. Any allowance added to Policy HO1 now would, in the absence of reliable evidence, have to exclude any element relating to future clearance programmes and would therefore lead to lower housing provision than if this is assessed within the Allocations DPD.</p>	
Objections to Policy HO1 on the basis that it sets the housing requirement too low.			
<p>1. HO1 - The Regional Spatial Strategy (RSS)</p>	<p>1. A couple of objections are made on the basis that the housing requirement has been set at a level below that of the Yorkshire and Humber Regional Spatial Strategy 2005 (RSS):</p>	<p>There is absolutely no logic or sense in making judgements about the appropriateness or otherwise of the Core Strategy's annual housing target for the years 2013-30 by comparing it to the previous RSS targets.</p>	<p>105, 129, 512</p>

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	<ul style="list-style-type: none"> • We note that the SNPP figure is 490 dwellings per annum less than the former RSS figure of 2700 dwellings per annum and the Employment Led scenario, whilst closer, is still 135 dwellings per annum less than the previous RSS level. Given the historic shortfall in housing construction and the recession, which has further decreased the number of houses built, all of which has exacerbated the housing need, the Councils housing need requirement would seem to be at odds with the previously known picture. • The RSS requirement set out a projection of the housing need at a time of growth. Over the long term we would expect to be back on a pattern of growth. We are therefore surprised that the Core Strategy adopts a housing requirement significantly lower than the RSS figure. • Any figure which lies below the RSS housing requirement for Bradford of 2700 / annum is unsound. 	<p>The RSS targets were prepared at a different time under different circumstances. The RSS was based on different evidence which is now out of date. Finally it should be pointed out that the Government has made it clear that in constructing its plans and making planning decisions LPAs should not rely on now revoked Regional Spatial Strategies and this has been re-affirmed in a number of Core Strategy EIP's</p>	
<p>1. HO1 - The Regional Spatial Strategy (RSS)</p>	<p>2. The RSS housing figures were acknowledged to be based on out-of-date population forecasts with the RSS adopted on the basis that it would be followed by an immediate Review of the Housing numbers. Papers issued suggested a need to increase the housing numbers by between 18 and 35%; i.e. an increase from 22,000 to more than 30,000 units per year. A simple extrapolation for Bradford would imply a figure of 3,700 dwellings per year should be provided through to 2026 and beyond.</p>	<p>The work undertaken by the Yorkshire and Humber Regional Assembly following adoption of the RSS and in preparation of a potential review of that RSS is now superceded. That review was never undertaken and the planning system has been reformed. Not only have Regional Strategies been abolished but the whole background in terms of planning policy and evidence has changed. The analysis made by the objector is simply not credible.</p>	<p>512</p>

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	<p>Taking this (RS) figure forward would suggest that for the period to 2013 - 2030 should be a minimum 45,900 dwellings. The revised RS figures of around 3,700 per annum would suggest a requirement in the order of 63,000 units. With the addition of the 7,687 backlog a total housing requirement of 71,600 units or 4,200 / year is justified.</p>		
1. HO1 - The Regional Spatial Strategy (RSS)	<p>3. For Policy HO1, a housing requirement is identified which is not robust or objectively assessed. It would seem to be a “finger in the air” exercise, representing 23% fall from the currently “adopted” requirement of 2,700 dwellings per year.</p>	<p>It is absolute nonsense to suggest that the housing requirement has been a ‘finger in the air exercise’. It was based on a robust study produced by GVA and Edge Analytics. It is clearly nonsense to base an assessment of the acceptability of the Core Strategy’s housing target on how much it differs from the previous RSS unless the argument is made that there is no material change in circumstances or evidence between then and now.</p>	512
2. HO1 - The What Homes Where Toolkit	<p>1. As an indication of what we consider to be the true housing requirement to be we have reviewed the ‘What Homes Where’ toolkit. This toolkit identifies a need for 48,845 net dwellings over the plan period (2013 to 2030). This equates to 2,873 dwellings per annum in Bradford District which is significantly more than 2210; the level proposed by the Core Strategy.</p>	<p>The Council would suggest that as useful as it is, the use of the toolkit alone would be a simplistic approach which would not provide a full and objective consideration of all the factors and variables necessary to assess need. It should also be pointed out that the What Homes Where toolkit as used in this objection is out of date and does not incorporate the latest government population and household projections</p>	105, 129
3. HO1 - Affordable Housing Need Based Justification for Increasing the Target.	<p>1. A number of representations argue for an increased district wide housing target in order to deliver more affordable homes:</p> <ul style="list-style-type: none"> • A net affordable need of 769 dwellings per annum, which is identified in the SHMA (and which cannot be met with an overall requirement of 2,200 dwellings per annum) shows the flaws in the Council’s approach and that a higher overall housing figure is required. 	<p>The Council considers that this objection is both factually incorrect and based on flawed reasoning.</p> <p>Firstly the updated SHMA indicated a net affordable housing requirement of 587 per annum not 769 per annum</p> <p>Secondly the NPPF suggests that the Plan should provide for the full objectively assessed for new homes including affordable homes. It does not specify that plans should be capable of delivering all affordable housing need via S106 contributions. There are other means of securing affordable</p>	423, 447, 489, 495

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	<ul style="list-style-type: none"> • Policy HO8 has a target that between 20% and 25% of total gross housing completions should be affordable housing. On this basis, to eliminate the 769 dpa affordable housing need, a minimum of 3,076 dpa would need to be provided. The provision of 2,200 dpa would only provide around 550 affordable dpa in the event that the 25% target is achieved. • The most recent SHMA for Bradford (2013 update), indicates an annual net affordable housing requirement of 587 per annum. This would represent approximately 27% of all housing developed, using the Council’s proposed housing requirement, to be affordable. This is unlikely to be a viable proposition given the location and types of site currently being progressed through the Bradford Core Strategy. To ensure that the plan achieves the full needs for both market and affordable housing will therefore require an uplift in the provision of market housing, • Enhanced open market supply will add to the numbers of affordable units particularly as economic conditions improve but other sources of supply via the Council and housing associations are also important. 	<p>homes. A significant contribution will be made from 100% social housing schemes provided by RSL’s or the Council. Based on the settlement targets set out in Policy HO3 and the affordable housing quotas which would apply in those settlements, the Council calculates that over 7,700 affordable homes could be provided via S106 agreements which would equate to 18.4% of the 42,100 district wide housing requirement. The SHMA itself suggests that between 20 and 25% of housing provision should be affordable. The deficit would need to be met via RSL / council schemes.</p> <p>Finally even if the plan’s proposals were considered not to meet the full need for affordable housing, the objectors proposal to increase the district housing requirement would be flawed. This is partly because, given viability levels, affordable housing quotas proposed for Bradford are low (15%) and thus the increase in the housing targets for Bradford needed to make much difference to the overall amount of affordable homes delivered would be considerable and mostly likely undeliverable.</p> <p>The alternative of placing the increased allocations within the higher value market areas of the district - which is what the objectors are advocating - would be flawed as the SHMA indicates that the majority of the net affordable need is within Bradford and not within those higher value areas.</p>	
<p>4. HO1 - General Comments Relating to the GVA & Edge Analytics Housing Requirement Study</p>	<p>1. The Core Strategy seeks to justify its housing requirement by reference to a report by Edge Analytics. This report essentially models two scenarios; one based on the rebased 2010 SNPP projections and the second on an employment led scenario. It concludes that the housing requirement should be between 2210 and 2565 dwellings per</p>	<p>The Housing Requirement Study (HRS) did indeed include other scenarios and included sensitivity testing by varying and number of assumptions. However the study recommended that those scenarios and variances be narrowed down to two core scenarios – the most appropriate and realistic. This is entirely justified and correct.</p>	<p>129</p>

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	annum. We would have expected to see more scenarios modelled.	As a matter of fact it should be pointed out that this objection is also referring to the initial study of February 2013 which was updated in August 2013 ahead of the issuing of the CSPD. Furthermore this August 2013 report has itself now been superceded by further work undertaken by Edge Analytics.	
4. HO1 - General Comments Relating to the GVA & Edge Analytics Housing Requirement Study	2. The report by Edge Analytics strongly advocates the need to adopt the outputs from the Employment Led scenario of 2565 dwellings per annum (paragraph 7.13) but the Core Strategy adopts the figure closer of the rebased SNPP figure. The Core Strategy has therefore not followed the preferred approach of its own evidence base.	This is incorrect. The objector is referring to the recommendations of the first HRS report. This report was superceded in August 2013 by an updated addendum report. The Core Strategy Publication Draft has followed and adopted the recommendations of the Addendum Report.	129
4. HO1 - General Comments Relating to the GVA & Edge Analytics Housing Requirement Study	3. At paragraph 5.3.13 of the Publication Draft Core Strategy it is suggested the Addendum Report recommended the housing requirement be set at the mid point range of 1807 to 2565 dwellings per annum. This is in fact not the case, the Addendum Report recommended that the 2011-based projections should not be used alone to set Bradford's housing requirement. It was suggested the Council may consider adopting a figure based on a mid-point range, but this was not a formal recommendation of the report.	This is a semantic and largely irrelevant point. The addendum report indicated the best approach given the uncertainty on how quickly the economy may recover and how much and how quickly household formation rates may increase. The Council followed this advice.	396, 397, 400, 402
5. HO1 - Housing Requirement Study Methodology – the Use of the 2011 Interim Population Projections	1. The use of the 2011 SNHP need to be considered with caution for a number of reasons. Most obviously they are only interim and do not cover the full plan period and they are reflective of a period of recession.	Neither the initial Housing Requirement Study of February 2013 nor the Addendum Report of August 2013 use the 2011 based interim population projections. Both use rebased 2010 based projections. The latest work carried out by Edge Analytics, and which shows that the housing target within the CSPD is sound, is based on the recently issued 2012 based sub national populations. This is in line with Government Guidance which suggest that the most recent government projections should be used along with any other relevant evidence. The objector is therefore advocating the use of superceded and flawed evidence.	105
6. HO1 - Housing	1. A number of representations suggest the		

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<p>Requirement Study Methodology – Targets Based on Recessionary Period</p>	<p>assessment of housing need is flawed and too low because it is based on trend projections relating to a period of recession. The points made include:</p> <ul style="list-style-type: none"> • The proposed annual housing requirement figure of 2,200 dwellings is unsound as it is in part based on figure which reflects a recessionary period • and therefore to do so would be wholly incongruous with an overall strategy which seeks to deliver economic growth. • In choosing a figure that is in part based on the 2011-based interim household projections, there is a risk, given this trend based projection reflects a recessionary period, that the strategy will not then meet the objectively assessed need for housing as it could result in an under-provision of housing. • To be sound, the annual requirement should therefore be 2,565 dwellings per annum as recommended in the housing requirement report (February 2013). 	<p>The housing requirement target does not reflect a recessionary period, it reflects a scenario which sits between scenarios of boom and of recession. This is because the August 2013 Addendum Report from GVA / Edge Analytics proposed a setting the target at the mid point between the number of new homes which would result from a continuation of the household formation rates from the 2008 based projections (boom period) and those which would result from the 2011 interim projections (recessionary period).</p> <p>To be clear, if the Council had really based their proposals on a continuation of this recessionary trend then they would have chosen the target which the Addendum Study produced for that recessionary trend i.e. 1,800 dwellings per annum. It should also be pointed out that the final housing target also represents an annual figure of much higher than 2,200 per annum since it also includes a backlog allowance. The real annual target is approximately 2,476 / annum.</p> <p>The Council also rejects the notion that the housing requirement chosen would not deliver economic growth. The chosen scenario – would just as in the first HRS - sees employment growth of around 1,600 jobs/annum and would see significant population and household growth. It would see greenbelt releases on a significant scale, major growth areas within the regional city, city centre regeneration, urban extensions, and also a significant increase in home building in both Wharfedale and Airedale compared to recent years.</p> <p>The housing requirement must be based on an objective assessment of need. It would be the opposite of being objective to just utilise a hope based assumption that 2008</p>	<p>129, 396, 397, 400, 402</p>
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		<p>boom based trend projection conditions would apply averaged over the <u>whole</u> plan period. This assumption is even more unrealistic when one considers that there is currently no forecasts which suggest a return to the economic and housing market conditions prevalent between 2003 and 2008 in the northern cities over the next few years and given that the Government’s austerity programme is expected to continue. To assume such a high average rate of economic growth over the plan period when economic conditions in the early part of the plan period are going to be anything but is to imply rates of growth well in excess of 2003-2008 based levels for the second half of the plan period. On what realistic evidence could such an assumption be made?</p>	
<p>7. HO1 - Housing Requirement Study Methodology – the use of the 2011 Interim Household Projections</p>	<p>1. We do not support an approach which utilises the interim 2011 based household projections as the GVA / Edge Analytics HRS highlights their shortcomings and suggests that such projections “provide a less reliable ‘trend’ projection of population growth than would otherwise be the case because at the time of release the Census results relating to fertility, mortality and migration were not yet available. It is also ‘half relying’ on the 2011 based interim projection and therefore still in part projecting forward recessionary conditions which is wholly at odds with aspirations of the Council’s plan for economic growth</p>	<p>The household projections and population projections are different things.</p> <p>The shortcomings of the 2011-based population projections are addressed in the HRS addendum (page 47 of the HRS: “It is important to recognise that these projections do not take into account all of the data usually required to update trends in the ONS projection model. Assumptions around future fertility, mortality and migration levels are based on the trends calculated for the 2010-based SNPP. This is because a revised back series for the rolled forward mid-2002 to mid-2010 population estimates taking account of the 2011 Census is not yet available to update the assumptions.”)</p> <p>GVA / Edge Analytics therefore use the 2011-based headship rates but not the population scenario that underpins the 2011 household projection.</p> <p>With regards to the 2011 based headship rates – the fact that they are derived from recessionary conditions is reflected in the Housing Requirement Study’s recommendation to use the mid point between housing targets based on the two 2008 and</p>	<p>105, 396, 397, 400, 402</p>

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		2011 based scenarios.	
<p>7. HO1 - Housing Requirement Study Methodology – the use of the 2011 Interim Household Projections</p>	<p>2. Several representations have been made which criticise the assumptions on household formation made in the GVA / Edge Analytics Housing requirement Study for the period beyond 2021. The 2011 Interim Household Projections only extend to 2021 and the representations criticise the use of two scenarios – one where headship rates beyond 2021 are fixed at the level indicated in 2021 and one (the HRS Study’s preferred approach) which continues the trend in household formation as at 2021 (which for Bradford at 2021 shows slight decline in rates).</p> <ul style="list-style-type: none"> • Beyond 2021, we consider that the best approach is to apply the rate of annual change in household formation from the 2008-based household projections to reflect such long term trends (and in the absence of other long-term projections of household formation). This approach has found favour with an increasing number of Inspectors at Local Plan EIPs, including those recently at Lichfield District and South Worcestershire. • A recent Town and Country Planning Association paper (New estimates of housing demand and need in England, 2011 to 2031 by Alan Holmans) identifies much of the suppressed household formation rate contained within the 2011 figures is due to the economic recession. He suggests that of the 375,000 household shortfall relative to trend, around 175,000 of that shortfall will be replaced across the remainder of the period. Therefore under 	<p>The Council considers that the approach taken to household formation rates beyond 2021 in the scenario based on the interim 2011 based household projections is reasonable.</p> <p>The Council agrees with the approach taken Edge Analytics as preferable and more realistic that the alternative approach advocated by consultants NLP. Rather than consider the 2011-based and 2008-based headship-rate range, NLP advocate using 2011 based headship rates to 2021 but then revert to 2008-based rates thereafter, either by simply using 2008-based rates from 2022 (NLP’s index approach) or allowing the model to achieve the 2008-based headship rate by the end of the forecast period (NLP’s catch-up approach). Testing this approach on the SNPP-2012 scenarios demonstrates that the ‘index’ methods results in a ‘step-change’ in household numbers after 2021 which is unrealistic while the ‘catch-up’ approach, results in the 2008-based number exactly which likewise is unrealistic. The Council would also urge caution in applying a generic national research paper to the Bradford context. Within Bradford average household size has actually increased between the 2001 and 2011 censuses and household formation going forward will reflect local demographic factors, ethnicity and cultural factors, as well as the economic trends. Caution is also advised as it is unlikely that the pace and nature of economic recovery within Bradford will match the average sate across the country which is skewed by the higher levels of growth and recovery in the south east.</p> <p>The Council have consulted with Edge Analytics who dispute this assertion. In the original Worcestershire SHMA, the 2008-based headship rates were used and were re-scaled to the</p>	<p>105, 423, 447, 489, 495</p>

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	<p>more favourable economic conditions, expected in future years, it is highly likely there will be a return to higher rates of household formation.</p> <ul style="list-style-type: none"> • It is worth noting that both GVA and Edge Analytics were the consultants behind the SHMA document referred to by the Inspector in the South Worcestershire EIP. This document was found unsound and included similar assumptions on headship rate formation post-2021 as the August 2013 Bradford Local Housing Requirement Addendum has. • The work carried out by GVA/Edge Analytics in their two reports in many respects parallels that undertaken for the Leeds CS and which was considered at the Leeds EIP in October. The full report of the Leeds Inspector has yet to be produced but it is significant that the Edge Analytics witness, Dr Peter Boden, at the Leeds EIP agreed that modifications to the findings in their Leeds reports were necessary to achieve a better alignment between homes and jobs leading to an agreement of a higher annual housing requirement figure. 	<p>2011 household number taken from Council Tax records. The 2011-based headship rates were not used in the original SHMA. The claimed parallels with the Bradford work are therefore disputed.</p> <p>The Council have consulted with Edge Analytics who dispute the accuracy of this comment and the depiction of what Dr Peter Boden said at the Leeds EIP. Edge Analytics produced a range of scenarios for Leeds reflecting the latest 2011 Census evidence and an evaluation of the likely impact of REM jobs forecasts. The scenario evidence suggested that the current housing growth target for Leeds was at the top of the range of likely growth outcomes; other scenarios suggested that the growth outcome could be lower. Leeds City Council resolved to retain its existing target, despite the alternative evidence.</p> <p>The Council would also point out that the arguments made by some of these objectors at the Leeds EIP and their evidence which in some cases parallels these Bradford representations have not resulted in a recommendation by the Planning Inspector to increase Leeds’s housing target.</p>	
<p>8. HO1 - Housing Requirement Study Methodology -</p>	<p>1. A number of indirect indicators are given which are claimed to show a recovery / increase in household formation:</p>	<p>While these background indicators may or may not be accurate and relevant in the Bradford context, the effect if any on household formation is unclear and unexplained. Moreover the Council, by choosing the midpoint of two scenarios is</p>	<p>447</p>

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Household Formation Rates Are Likely to increase	<ul style="list-style-type: none"> Detailed short term evidence provided by first time buyer data provides evidence of higher rates of household formation and a return to the levels of household formation experienced at the end of the relative boom years in 2007. The impact of the ‘Help to Buy’ scheme has been experienced in this recent trend and the Chancellor’s decision in his March budget to extend this scheme for a further four years; the UK economy has emerged from recession into a period of initial slight growth with future growth projected for 2014 and 2015 rising; the differences in the demographic make-up of Bradford’s population and the considerable increase in the number of young people compared with the national average and in particular the increase in the population of working age which will occur across the plan period. 	<p>already factoring in an increase in household formation rates as the plan period progresses.</p> <p>The use of short term evidence on first time buyer activity is not a sound basis for concluding that the 2008 based rates of household formation have returned.</p> <p>While the UK economy as a whole is experiencing steady growth, such growth and recovery is altogether weaker in regions such as Yorkshire where the economy is still proportionately more reliant on the public sector and where current and planned Government cuts are disproportionately focused.</p> <p>While Bradford does have a young age structure it also exhibits a greater propensity to larger household sizes particularly among the BME population.</p>	
9. HO1 - Housing Requirement Study Methodology – Jobs Growth Assumptions / The REM	<p>1. There is a clear disconnect between the job target set out in the Core Strategy and the job targets underpinning the housing requirement figure.</p> <p>Policy EC2: Supporting Business and Job Creation identifies an aspiration to create at least 2,897 jobs annually. It is therefore confusing why the work upon a housing requirement figure uses a significantly lower target of 1,600 jobs annually (para 6.7, Bradford District Housing Requirements Study, February 2013).</p>	<p>The Council accepts that there is a need for the Core Strategy as a whole to adopt consistent assumptions on jobs growth.</p> <p>The Plan as currently drafted includes an aspiration that jobs growth might be achieved at a much higher level than is currently and consistently modelled within the Yorkshire and Humber REM.</p> <p>However it is important to stress that the figure of 2,897 new jobs per annum is a theoretical figure which would provide in full for jobs for both the projected number of people claiming job seekers allowance by 2030 and for the jobs required by the increase in working age population. The plan in Policy EC2 identifies measures which the Council will take to achieve employment growth, however the Plan does not include an</p>	105, 129, 396, 397, 400, 402, 423, 437, 447, 489, 495

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		<p>employment land supply or other proposals which will achieve 2,897 new jobs per annum – this would in the Council’s view be unachievable. Reducing unemployment levels to the national average – something which has not happened in recent history – would be a big enough challenge, let alone reducing it to zero.</p> <p>Within this context it is unsurprising that the objectors also fail to provide any evidence to indicate how such a high jobs growth target will be met. In the light of current REM projections of around 1,600 jobs per annum it is clear that it can’t.</p> <p>In the employment section of this table the Council has outlined how the employment section and Policy EC2 might be clarified accordingly.</p>	
9. HO1 - Housing Requirement Study Methodology – Jobs Growth Assumptions / The REM	2. Based on current evidence the Council’s housing requirement figure should be based on the employment-led scenario figure of 2,565 set out in the original requirement study as this figure more closely aligns with the Council’s aspirations for economic growth, job creation and population growth set out in the Core Strategy.	See above.	396, 397, 400, 402
10. HO1 - Housing Requirement Study Methodology - Assumptions re Economic Activity rates	1. In constructing the employment constrained projections for the February 2013 Bradford Housing Requirements Study, Edge Analytics varied older person economic activity rates to reflect changes to pension ages in the long term. Edge Analytics assumed that for the 50-64 and 65-74 age groups, economic activity rates would incrementally increase by 10% between 2011 and 2030 to reflect the gradual impact of this employment factor. (Paragraph 5.32)	The Council have consulted Edge Analytics on this issue. The adjustments were based on a sound assessment of the likely change in economic activity rates resulting from statutory pension age (SPA) changes. If anything, they are likely to underestimate the likely change in economic activity rates in older age-groups over time. In the August 2014 Edge Analytics report, changes are made in the 60–69 age groups to account for the SPA changes. This is based on analysis of ONS Labour Force projections, the changes that have been seen historically (2001–2011) and the changing SPA.	489

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	<p>The implication of this adjustment is that a lower level of in-migration is required to support existing or new jobs and hence it can be associated with a much lower level of population and housing growth as a result.</p> <p>Whilst it is agreed that changing statutory retirement ages are likely to have some impact upon economic activity rates, the Housing Requirements Study does not provide any evidence to demonstrate the extent to which the scale of increase that has been modelled is likely to occur in practice.</p> <p>The figures that result from this key set of employment-led scenarios can be viewed as illustrative at best and should not be considered as providing a reliable indicator of future demographic change and housing requirements. For example, if this degree of change was to be even slightly lower, the planned level of housing provision would result in a shortfall in housing, to deliver against the forecast level of employment</p>		
<p>11. HO1 - Housing Requirement Study Methodology - Errors in the Use of Vacancy Rates</p>	<p>1. There are a number of arithmetical errors regarding the application of vacancy rates to convert households into dwellings, which would increase the requirement still further.</p> <p>It is standard modelling practice to translate households into dwellings by applying an allowance for second homes / empty properties. To take an example, Figure 3.4 of the 2013 Addendum (set out below) calculates that under the employment-led (REM) scenario, the number of households will increase by 42,333 between 2011 and 2028. The GVA / Edge Analytics then increase this figure by</p>	<p>The Council have consulted Edge Analytics on this issue.</p> <p>GVA incorrectly applied a 3% uplift to household numbers to derive the dwelling requirement. The 2011 value is 3.8%. Edge Analytics routinely applies a consistent (2011) Census vacancy rate in its dwelling growth scenarios. In Bradford’s case this is 3.8%. This is an approach that has been routinely and consistently applied for other LCR studies. This Census vacancy rate includes second homes and holiday lets. In the HRS, a 3% uplift is applied to the provided household numbers – this is not consistent with the approach routinely taken by Edge Analytics (and that used in the POPGROUP software).</p>	<p>423, 489, 495</p>

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	<p>3%, to derive a dwelling requirement of 43,603.</p> <p>However, this is erroneous, as this does not result in an overall vacancy rate of 3%. The correct calculation should have been $42,333 / 0.97 = 43,642$ dwellings between 2011-2028, some 39 dwellings higher. This error is replicated across all the modelled scenarios.</p> <p>Whilst this is a minor arithmetical point, there is a further inconsistency with their use of an assumed vacancy figure of 3%. The February 2013 Housing Requirements Study states that: “Examining empty properties, the analysis shows that as of July 2012 4.7% of all stock in Bradford was classified as empty. This is higher than the standard benchmark of 3%”. On this basis, a figure of 4.7% should have been factored into the aforementioned calculation, rather than 3%.</p>	<p>The vacancy rate is used as a conversion factor in POPGROUP, to convert between ‘households’ and ‘dwellings’.</p> <p>This is addressed in the 2014 update carried out by Edge Analytics where a 3.8% vacancy rate is used for this reason.</p>	
12. HO1 - Housing Requirement Study - The Scenarios	<p>1. The GVA / Edge Analytics reports recommend a requirement figure based on the employment led (REM) scenario, which we support.</p>	Comments noted	396, 397, 400, 402
12. HO1 - Housing Requirement Study	<p>2. The 2,200 requirement does not relate directly to any demographic projection.</p>	This is incorrect. The HRS carried out by GVA / Edge Analytics is based on scenarios created using the 2010 based sub national population projections.	105, 423, 437
12. HO1 - Housing Requirement Study	<p>3. Several representations criticise the use of the mid point between the two scenarios which utilise different household formation rates:</p> <ul style="list-style-type: none"> The creation of an arbitrary mid - point scenario has no policy or other justification. 	This is incorrect and the justification for it is clear as it is based on an assumption that economic and housing market	447

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	<ul style="list-style-type: none"> • Choosing to use a mid-point figure would be at odds with the approach advocated in the original housing requirements study published in February 2013 which concluded that emphasis should be placed in terms of the setting of a dwelling requirement to support the strategy aim of supporting and facilitating economic growth. • Whilst we agree that modelling is not an ‘exact science’, and that there needs to be an element of judgement as to where an appropriate figure might lie, by taking a random mid-point between the two upper and lower ranges suggests that the modellers have limited faith in the robustness of either scenario, and have ended up recommending a figure that is not substantiated by any of their many model runs. 	<p>conditions will recover over the plan period meaning that a housing target which reflects the mid point between the two contrasting ‘boom and bust’ trend periods.</p> <p>If the rather bizarre logic of this comment was followed the objectors own preferred methodology – that used by NLP which also utilises and blends 2008 and 2011 based projections - would be equally flawed.</p> <p>This is incorrect. There is no such conflict and more importantly the approach follows the advise and suggestion of the more up to date piece of work.</p> <p>The Council do not agree with this statement. It is for the very reason that there is uncertainty over future rates of household formation that a ‘range’ and an ‘average’ are presented. This does not indicate “limited faith” in the robustness of the scenarios.</p>	<p>396, 397, 400, 402</p> <p>489, 495</p>
<p>12. HO1 - Housing Requirement Study - The Scenarios</p>	<p>4. Paragraph 7.17 and 7.18 of the original requirement study states that delivering homes based on the employment led scenario requirement figure of 2,565 dwellings will lead to a number of positive outcomes which will not be achieved based on the lower target adopted. These include:</p> <ul style="list-style-type: none"> • The strong growth of the labour-force; • Significant amounts of direct and indirect employment through the development and construction of new housing; • The capacity to increase local spending linked to the growth in population helping to support retail and other service sector 	<p>The Council considers that the objector is exaggerating the impacts of adopting a revised and lower housing requirement based on the addendum report. This is because both the original and addendum reports projections are using exactly the same run of the REM with the same economic and jobs growth assumptions. The key change is merely the rate at which new households form from the population.</p>	<p>396, 397, 400, 402</p>

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	<p>businesses; and</p> <ul style="list-style-type: none"> Increasing Council tax revenues and payment of New Homes Bonus which can help to support investment in services, infrastructure and environmental improvements. 		
12. HO1 - Housing Requirement Study - The Scenarios	<p>5. It is suggested that the REM based scenario which utilised the 2008 based household projections should have been used because if the 2008 based projection is correct the plan will have under estimated housing need and allocated insufficient land.</p>	<p>This representation is flawed. The objection seems to imply that the balanced, reasoned and objective evidence of what the likely level of housing need might be should be ignored on the unlikely event that household growth over the plan period as a whole mirrors the boom period of 2003-8. This would almost certainly result in the allocation of too much land and the removal of large areas of green belt contrary to Government guidance which states that the green belt should be amended within local Plans only where justified by exceptional circumstances.</p>	396, 397, 400, 402
12. HO1 - Housing Requirement Study - The Scenarios	<p>6. Paragraph 7.13 of the original requirement study suggests that initial results of the 2011 Census reinforces the position to plan for a level of growth <u>above</u> that identified within the re-based 2010 SNPP scenario. It is relevant in this regard to highlight the 2010 SNPP scenario resulted in a requirement figure of 2,210 dwellings, very similar to the mid-point figure now proposed.</p>	<p>The comparison is not relevant as the results from the February 2013 HRS are superseded and new data on both population and household growth means that the figures resulting from the population based scenario (and the economic scenario) are lower.</p> <p>Also the original report was referring to the choice between the rebased SNPP scenario and the REM based scenario (both of which were using the most up to date at the time household projections – 2008 based).</p> <p>The CSPD still follows this principal – the revised work carried out this year by Edge Analytics using more up to date data, suggests the SNPP scenario gives a housing requirement of 1,695 which is well below the level chosen by the Council. The difference is the assumptions made on headship rates.</p>	396, 397, 400, 402
13. HO1 - Other comments suggesting the	<p>1. The problems of homelessness, affordability and suppressed demand are a very significant problem in Bradford District. The National Housing</p>	<p>The Council have acknowledged that the waiting lists are one important indicator of housing need but would suggest that the housing requirement and the incorporation within it of a</p>	447

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<p>housing target is too low.</p>	<p>Federation (representing housing associations) reports that, based on research and interrogation of the Council's Housing Division records an estimated 20,000 people were on the waiting list for social housing. The Council's Housing and Homelessness Strategy is part of the evidence base for the PDCS. This document, which looks forward over five years, also identifies a widening gap between supply and need.</p>	<p>backlog element over and above what is generated by the annual requirement alone is designed to address this. It should also be pointed out, however, that care should be taken in the use of waiting list data because in the main they represent households who are not homeless but are in accommodation which does not meet their full needs of is not in the right location.</p> <p>Finally the Council points out that while the housing need which is suggested by this waiting list data is concentrated in Bradford, the objector is suggesting that none of their proposed increase in the district housing requirement be distributed there, instead opting to suggest increases in the main to the higher value areas of Wharfedale and Airedale.</p>	
<p>13. HO1 - Other comments suggesting the housing target is too low.</p>	<p>2. The Hunston case is clear that the fully objectively assessed housing need figure should be considered when considering housing target.</p>	<p>The Council has set a housing target to meet in full the objectively assessed need for new housing in the district.</p>	<p>369, 437</p>
<p>Objection to Policy HO1 on the basis that it sets the housing requirement too high.</p>			
<p>1. HO1 - Alleged Vested Interests</p>	<p>1. A number of representations have been received suggesting that the assessment of housing need is flawed because the evidence was prepared by GVA who it is claimed have vested interests. They point to GVA's involvement in promoting sites in the district.</p>	<p>GVA are an extremely large and multi disciplinary company with a number of specialisms and regional offices. The team which carried out the HRS are entirely separate to that which deals as agents for developers and it was a condition of the appointment that that the HRS work was carried separately and was not shared with other sections of the company dealing with site based matters in Bradford.</p> <p>Secondly it is telling that this objection seeks to make groundless assertions but fails to back this up with any reliable evidence with regards to the work itself being flawed.</p> <p>Thirdly, large elements of the work – the data underpinning it were produced by other organisations and the modelling work was also not done by GVA.</p>	<p>11, 70, 71, 488, 516</p>

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		<p>The population growth projections within the study and its various scenarios stem not from GVA but from other respected and independent sources. The economic based scenarios generate a population and household growth projection based on the Yorkshire and Humber Regional Econometric Model – that model is the product and work of the company Experian, not GVA. Secondly the core data population and household projections within the SNPP projection come from the Government and the ONS, again not from GVA. Finally the data inputs for the scenarios are fed into the POGROUP model and this modelling work was done by consultants Edge Analytics, and not by GVA.</p> <p>The report, its content, analysis, and findings are in the Council’s view sound, well argued and the approach taken accords with Government guidance. Moreover in all the dealings the Council has had the staff from GVA have been professional and objective.</p>	
1. HO1 - Alleged Vested Interests	2. The population expansion predictions need to be independently validated.	The population and household projections which underpin the assessment housing need are produced independently of the council by the ONS and the CLG. The Government requires Councils to set their housing targets having regard to these projections. The projections issued by the ONS and the CLG have been appraised and used in combination with a range of other information by independent consultants GVA and Edge Analytics in the Bradford Housing Requirements Study.	409
2. HO1 - Duty to Co-operate	1. 42,100 is unreliable because of the Council's failure in its Duty to Co-operate with adjacent LPAs to arrive at an area wide assessment of housing need.	The Council has not failed in its duty to co-operate. The joint working and co-operation between the authorities within the Leeds City Region in assessing housing need and developing a consistent and shared methodology for doing so is set out in the Council’s Duty to Co-operate Statement.	483
3. HO1 - Lack of evidence to base the number on	1. A number of objectors consider the housing requirement has not been based on up to date or credible evidence. Detailed comments are as	The housing target has been based on the Housing Requirement Study produced by consultants GVA & Edge Analytics, which the objectors have presumably not read. This	191, 409 25, 125, 452,

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	<p>follows:</p> <ul style="list-style-type: none"> • The housing target is not justifiable • I would like to know just where the figure of 42,000 new homes "required" in the district has come from, what magic formula has been used to come up with this figure?. • Housing requirement not based on credible and well-researched evidence and has been accepted without critical scrutiny. • It is acknowledged that the population of the District may rise and housing development may be required, although definitive evidence of the numbers involved is sadly lacking. 	<p>study provides an objective assessment of housing need in line with Government policy.</p>	<p>498, 518</p>
<p>3. HO1 - Lack of evidence to base the number on</p>	<p>2. Forecasts for housing need are based on out of data information (i.e. 2001 Census). Calculation should be based on 2011 census</p>	<p>The Housing Requirement Study issued in 2013 was not based on out of date information and was not based on the 2001 Census. It was, as is required by Government Guidance, based on the latest at the time population and household projections. Furthermore since the CSPD was published a further update to the Housing Requirement Study has been carried out by Edge Analytics using the Census 2011 data together with 2012 based population projections.</p>	<p>25</p>
<p>3. HO1 - Lack of evidence to base the number on</p>	<p>3. The projected housing requirement numbers for the district and specific sections of the district appear over-estimated and not representative of likely future demand</p>	<p>The Council has set out and published the evidence behind its objective assessment of need. What assessment work has the objector carried out which results in their conclusion?</p>	<p>117</p>
<p>4. HO1 - Economic Conditions Will Not support the Proposed Level of Need / Numbers / Jobs</p>	<p>1. It seems perverse and illogical to produce a plan based on a mythical estimate of housing need. A more positively prepared Plan would take a realistic view of the possibility of economic regeneration over the next 15 years.</p>	<p>Whilst the objector may feel that the housing requirement has been set too high it is clearly incorrect to describe the work done as a 'mythical estimate'. The housing requirement has been set to accord with the objective assessment of need carried out by consultants GVA and Edge Analytics. That assessment was based on an analysis of a range of demographic and economic projections issued by the CLG, the ONS and Experian, all of which are respected for their expertise in their areas. The projections also reflect not</p>	<p>412</p>

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		Council aspirations but the latest modelling of future economic performance and jobs growth by Experian.	
4. HO1 - Economic Conditions Will Not support the Proposed Level of Need / Numbers / Jobs	2. The assumptions with regards to economic growth within the HRS and on which the housing requirement are based are both aspirational and far too optimistic based on recent experience in Bradford District.	The economic and jobs growth assumptions used to derive the housing requirement within the GVA / Edge Analytics study have not been selected by the Council, they come direct from the Yorkshire and Humber Regional Econometric Model.	111
4. HO1 - Economic Conditions Will Not support the Proposed Level of Need / Numbers / Jobs	4. The Housing Requirements Study Addendum Report by GVA with Edge Analytics dated August 2013 shows various scenarios for average household change over a 17 year period ranging from 1,646 at Figure 3.1 SNPP- 2010 trend based to 2,490 at Figure 3.3 Employment led REM. This latter figure is clearly inappropriate. The SNPP figure in Figure 3.1 should form the base of the Publication Draft Strategy. Accordingly if the Figure at line G in table A were reduced to the trend based projection of 1646 the total figure in line G would be 27,982, a total reduction of 9418. Keeping the same allowance for reduction in vacant homes the total requirement would be 32,669 which seems to me to be a more realistic	The objector fails to explain why the REM based figure is ' clearly inappropriate '. Has the objector alternative evidence or modelling of the regional and local economy which they consider to be more accurate than that produced by Experian? The objector fails to provide any justification for the statement that the SNPP figures from table 3.1 are preferable or why the housing requirement should be reduced to 32,699. One can therefore only presume that this figure has been suggested as appropriate merely because it is lower and the objector wishes to see the proposal for an urban extension at Holme Wood removed. This sort of approach is clearly completely contrary to the Government's requirement to base housing requirements on an objective assessment of need and then to provide for that need and to support housing growth in a positive way.	412
4. HO1 - Economic Conditions Will Not support the Proposed Level of Need / Numbers / Jobs	5. The GVA / Edge Analytics Housing Requirement Study is flawed in a number of ways including the jobs growth assumptions used, the assumptions relating to the value of construction jobs to the local economy and incorrect data on house prices.	The Council do not agree with these comments. Moreover whatever assumptions are made about the value of construction jobs to the local economy, this has not been a significant factor in setting the housing requirement within Policy HO1. The housing requirement has been based on an objective assessment of need and that need has been related to core data on projected household and economic growth.	488
4. HO1 - Economic	6. How will the required number of jobs to support	The projected need for new homes reflects projected	202

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Conditions Will Not support the Proposed Level of Need / Numbers / Jobs	the proposed population growth be created. Without the jobs the actual demand for housing will be lower.	increases in the district's population and independent modelling of the local and regional economy.	
4. HO1 - Economic Conditions Will Not support the Proposed Level of Need / Numbers / Jobs	7. Low economic growth and reduced bank lending and mortgage availability will affect the demand for new homes.	The Council are required to assess and then provide for future housing need not housing demand.	68
4. HO1 - Economic Conditions Will Not support the Proposed Level of Need / Numbers / Jobs	8. Houses need to be built where the jobs are. Leeds has a higher employment rate than Bradford. Therefore within the Leeds City Region proportionately more houses need to be built in Leeds than Bradford until employment rates equate.	Leeds City Council is producing its own Local Plan and informed by a range of factors is indeed planning for a much higher level of new housing than is the case in Bradford. This reflects the objective assessment of need in the Leeds district.	28
4. HO1 - Economic Conditions Will Not support the Proposed Level of Need / Numbers / Jobs	9. The Plan is unsound because the upward pressure on the total housing requirement is flawed. It is not realistic. Instead, it is aspirational, which is Council-speak for 'much more than is actually needed'.	The housing target is not flawed or aspirational. It is based on evidence of future population and household growth within the district.	393
5. HO1 - Alleged Land Supply Constraints	1. The Conservative Group believe that the district wide housing target should be reduced by 3000 due to an inadequacy of land supply within the SHLAA. In the case of the SHLAA it is realistic to assume that not all the sites it considers are suitable for housing. Given that the SHLAA has land available for only 52,000 homes and the Local Plan requirement is for at least 42,100, there is a significant risk that insufficient land exists to meet the stated housing requirement at the densities proposed in the Core Strategy (once other planning	It is unclear where the suggested reduction of 3,000 has come from and on what evidence it is based other than a desire to see the specific settlements targets reduced in certain areas. The supply of available and deliverable land within the district has been a significant factor in formulating the plan's vocational strategy, however the Council disagrees that the SHLAA results indicate that the overall target of 42,000 cannot be met. As the objector notes there is a significant buffer of supply within the SHLAA over and above the 42,000 target. It is accepted that some of the SHLAA sites currently	157

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	constraints and considerations are taken into account).	classified as developable may eventually be ruled out for housing development once more detailed work is undertaken or may be needed for other types of development or other land uses. However it is equally true to say that further sites may be identified to provide more options for development. The latest SHLAA update, currently nearing completion includes a range of new sites not within the first 2 SHLAA's. These include new call for site submissions and new planning permissions. It should also be pointed out that further potential green belt releases will be included in the updated SHLAA as the green belt sites in the second SHLAA only reflect those submitted speculatively and do not include further potential sites resulting from the Growth Assessment carried out by Broadway Malayan.	
6. HO1 - Impact on the countryside	1. With reference to our comments on Policies SC5 and SC7, we are very concerned that the housing requirement places such pressure on the total amount of land in the District that some damage to the countryside and to the character and function of settlements will occur. If the District did succeed in meeting its full requirement then, by default, the Plan sets the District up for a wholly unsustainable pattern of development post 2030, because all available sites at that time would be in unsustainable locations	This is a unsubstantiated statement which seems to be based on a sweeping assumption that all and any development on green field land or green belt would be unsustainable. The Council strongly disagrees with this view.	394
6. HO1 - Impact on the countryside	2. The scale of housing required would have a detrimental impact on the district as a whole	In what way? The point being made is unclear. The Council considers that not to provide for the objectively assessed need for new homes would have severe detrimental effects on the district's population, their health and well being and on the districts economy.	504, 506
7. HO1 - Windfall	1. A number of representations suggest that the plan should have included a windfall allowance and thus the housing target should be lower. It is also claimed that the lack of windfall allowance is contrary to the NPPF / Government policy. Detailed	The Council does not think it would be either appropriate or in line with the principle to plan positively to meet the housing needs of the district to include a windfall allowance within the plan period. It considers that bearing in mind past under delivery of housing, the current shortages of homes within the	424, 516 142, 145, 146, 183, 336, 367, 370

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	<p>points are set out below:</p> <ul style="list-style-type: none"> • Housing policies HO1 and HO2 need to be modified to reflect the implications of the March update of the National Planning Policy Guidance, which has confirmed that windfall can be incorporated as a source of supply to the overall housing requirement. The Bradford Core Strategy requirement figure therefore needs to be reduced to explicitly incorporate windfall, thereby reducing the overall need/extent of future green belt release – including the critical strategic gap between Bradford and Leeds. • There has been no allowance for windfall sites. • The plan conflicts with NPPF para 48 with regard to windfall delivery inclusion • Windfall sites in Addingham should be included and reduce the apportionment 	<p>main urban areas and the projected rapid increases in households, there is a strong argument that there should be certainty and confidence that an adequate land supply for the plan period is in place. Relying on windfall would reduce that certainty.</p> <p>The Council would also point out that there has been no change in the National Planning Policy Framework – the NPPF allows Councils to include a windfall allowance but does not as some objectors suggests require it. NPPF paragraph 48 of states, “Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”</p> <p>The Council's view is that there is no case for an inclusion of a windfall allowance within the first 5 years of the plan period. This is in fact the period when there is most certainty over the nature and spread of sites which are likely to come forward via the information gathered within the SHLAA. Since all sites within the SHLAA are candidates for allocation within the Local Plan none of those which are deliverable can be considered to be windfalls. Moreover the site size threshold for inclusion in the SHLAA been reduced to just 0.2ha or 5 dwellings (compared to the RUDP threshold for allocation of 0.4ha) meaning that the range of sites which would be ineligible for inclusion in the Local Plan and which would therefore deliver windfalls has been reduced.</p>	<p>51, 111, 1321, 301, 302, 304, 305, 306, 311, 319, 327, 334, 341, 352, 355, 367, 368, 370, 372, 374, 385, 403, 405, 449, 450, 454, 465, 466, 471, 480, 501, 516, 518</p>
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		<p>The Council also considers that past rates of windfall delivery are unlikely to be maintained in the new plan period. Windfall sites are defined in the NPPF as: “Sites which have not been specifically identified as available in the Local Plan process.”</p> <p>The last plan which was put in place was the RUDP which was prepared during 2001-2, some 13 years ago, and adopted in October 2005. It is therefore not surprising that windfall sites have become the main contributor to supply by number and proportion, as the actually allocated sites have been gradually built out and there has been no new Local Plan to formally identify and allocate recycled land and sites as they become available.</p> <p>This is not the position going forward. The planning system now incorporates a requirement for a more rigorous analysis of potential land supply in SHLAA’s which was not in place when the last RUDP was prepared and the Council is now preparing a new allocations plan based on its SHLAA. The SHLAA and Allocations process will sweep up any current and emerging sites or buildings and if sustainable and deliverable will allocate them. They will not therefore be windfalls. To include an allowance for windfall could therefore effectively double count the contribution which recycled land and buildings will make to future supply.</p> <p>The Council's view is that while it is likely that windfall will make an ongoing contribution it is likely, for the reasons set out above, to be at a lower level than in the recent past. It considers that any contribution made should be viewed as providing a modest level of additional insurance that the required rates of housing delivery will be met. It may also</p>	
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		allow the allocated land supply in the new Local Plan last a little longer than would otherwise be the case.	
7. HO1 - Windfall	2. Para 5.3.24 - In regard to windfalls we do not consider the approach taken is consistent with para 48 of NPPF and places reliance on windfalls. The other 2 categories noted above appeal to only a limited market sector. Not consistent with national policy, not justified, not sound.	<p>It is unclear what the objector is referring to. Windfall refers to sites which come forward following the completion of the relevant plan and which are not therefore not accounted for in site allocation lists. Once sites have been assessed and included in the new plan as allocations they are no longer windfalls.</p> <p>The plan proposes no reliance on or contribution from windfall to meet housing need during the plan period. Any sites above the threshold of 0.2ha or 5 units which have gained planning permission but which were not allocated in the RUDP are being assessed to determine whether they are likely to be deliverable or developable within the plan period. Only deliverable and developable sites are included in the land supply. These sites will – where considered the best and most sustainable options – be allocated for development within the Local Plan.</p>	108
7. HO1 - Windfall	3. There is a lot of past and potential windfall in Ilkley on PDL sites which ought to reduce the apportionment. Plus there has been a lot of historic windfall development which ought to be accounted for.	The issue of future windfall is covered in the Council's responses above. All past completions for the period 2004-13, including windfall, have already been subtracted from the district wide housing requirement. If they had not been the district wide housing target and the target for Ilkley would have been much higher.	2, 9, 12, 15, 18, 19, 20, 21, 23, 30, 31, 41, 46, 48, 67,72, 87, 88, 92, 104, 107, 118, 119, 120, 131, 133, 137, 141, 145, 146, 148, 153, 154, 155, 158, 159, 170, 180, 183, 204, 217, 268, 294, 295
8. HO1 - RSS	1. We question the basis for the overall figure of housing requirement of 45,500. This figure comes	The figure is not 45,500 it is 42,100 and the assessment does not stem from the RSS.	68

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	from the earlier Regional Spatial Strategy and pre-dates the current severe economic downturn		
9. HO1 - Number Unachievable Given Rate of Past Completions	<p>1. 42,000 houses by 2030 equates to 2,700 per annum. This seems implausible relative to recent history. Why plan so many if this is likely to prove unachievable. Reference to the proposed building rate has never been achieved over the last 10 years.</p>	<p>The target is 42,100 between 2013 and 2030 which actually equates to 2,476 / annum.</p> <p>The previous targets mentioned were not those of the Council but those of the RSS. The targets were not met in part due to economic and housing market conditions and in part due to a chronic shortage in land supply. Land supply is still largely based on a combination of the RUDP which released land to meet half the total of new homes which were subsequently set as a requirement in the RSS. The under provision therefore highlights the need for the new local Plan and a Core Strategy which seeks to significantly boost the supply of new homes and to allocate many more sustainable and deliverable sites such as that at Sty Lane, Micklethwaite.</p>	28, 202, 483
9. HO1 - Number Unachievable Given Rate of Past Completions	<p>2. Secondly the rate of completions is always less than target.</p> <p>Since the target is always aspirational (= much more than is needed) then using the accumulated shortfall to calculate another aspirational target will produce larger and larger numbers with the proportion of unneeded houses increasing at each iteration.</p>	<p>The rate of completions is not always less than the target as indicated by the Council's annual monitoring reports. However completions will clearly fall below the target if insufficient land has been identified or if the country suffers from the results of a global credit crunch and recession. This should not however be the focus – the focus should be on how many homes are needed and then providing to meet rather than frustrate the provision to meet that need.</p>	202, 393
9. HO1 - Number Unachievable Given Rate of Past Completions	<p>3. There are a significant number granted but not developed or sites that are available from the RUDP which have yet to have planning permissions granted.</p>	<p>Equally a large number of RUDP sites have now been built out. There are variety of reasons why other sites have not been developed including prevailing market conditions and protracted planning processes caused by local opposition to development. The new Local Plan will need to assess all remaining existing sites. Those which are considered developable will remain in the local plan but those which are considered unlikely to be developed for example due to land ownership, site constraints or viability issues will need to be</p>	202, 393

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		replaced with alternative viable sites. This assessment process is already underway within the Council's SHLAA.	
10. HO1 - Backlog / Demand	1. The under-supply calculation for the previous periods does not take into account the reduced demand stemming from the recession and the difficulty in getting mortgages	The Government requires Council's to assess need not demand and then provide for that need within a Local Plan. Demand does vary according to issues such prevailing market conditions and mortgage availability but this does not alter the requirement to provide for assessed need.	393
10. HO1 - Backlog / Demand	2. Included in the target is the buffer requirement. This only serves to increase the scope for developers to cherry-pick the most profitable (greenfield) sites irrespective of whether there is a five-year land supply or not. The buffer is highly unlikely to result in significantly increased completion rates.	The housing requirement target does not include a buffer. It does include a backlog element. The Government's policy relating to buffers is to ensure that additional supply is available in the early part of the plan period where there has been a record of recent persistent under delivery of homes. This affects the 5 year land supply requirement and is a timing issue – it does not add to the total quantum of homes over the plan period as a whole.	393
11. HO1 - Vacant Homes	1. A number of representations have been received suggesting that either there is no need for new homes or the proposed targets should be reduced due to the number of vacant properties in the district: The number should be lower to take account of the number of vacant homes in the district and the need to bring these back into use. Empty homes is also another indication that actual demand is significantly lower than estimated.	The housing target has already been reduced by 3000 to account for a reduction in the number of vacant homes.	202 82, 152, 508 2, 104, 107, 341, 343, 372, 403
11. HO1 - Vacant Homes	2. The Council has been unable to materially improve its performance in reducing the number of empty houses in the City	This is incorrect. The Council has in recent years been one of the most successful authorities in the country in reducing the number of empty homes. It has an ambitious target and plan for reducing empty homes and the district wide housing target has been adjusted to take this into account.	483
12. HO1 - NPPF /	1. The National Planning Policy Framework (NPPF)	The overriding consideration is to objectively assess housing	393

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Sustainability	requires BMDC to "ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework". This means that the range of sustainability considerations outlined in the NPPF can create a set of constraints that would make it unrealistic for the authority to meet the objectively assessed need in full. The overriding consideration is sustainability, not the calculated housing need.	need and then to plan positively to meet that need. There is absolutely no justification on sustainability grounds for reducing the housing requirement within Bradford district. Indeed providing for the housing needs of the population is a fundamental element of constructing a sustainable plan. Sustainability is not a one dimensional appraisal of environmental impacts as the objector implies but also measures the social and economic impacts and gains which the strategy will create.	
13. HO1 - Green Belt	1. Following on from Government guidance, using green belt to meet housing land targets is an option of last resort and this should therefore be another relevant factor in discounting the housing requirement.	The Council considers that there is no green belt related justification for reducing Bradford's housing target. There are a significant number of instances where urban extensions or local green belt releases in sustainable locations could be pursued which would not harm the strategic functioning of the green belt. The Bradford Growth Assessment underlines this view.	393
14. HO1 - Miscellaneous	1. House prices are higher in Leeds than in Bradford. This tells that demand is greater in Leeds. Therefore proportionately more houses need to be built in Leeds than Bradford until prices become more equal	More houses are being proposed within Leeds than Bradford but that is because housing need is projected to be greater there.	28
14. HO1 - Miscellaneous	2. The Draft (5.3.24) includes 4935 sites (of which Table HO2 shows that no less than 3,891 are on green land) that were allocated for housing in the RUDP. But the Council failed to save schedules H1 and H2 the result of which is that the Council has no sites carried forward from the RUDP, as the Council itself has conceded. The Draft is flawed in this regard.	The paragraph is explaining the extent of land, formerly allocated for housing development in the RUDP, and as yet unimplemented. Just because those sites were not saved it is unclear why the objector feels this makes the Core Strategy flawed. The land and the sites exist and they will be included along with all other potential sites in the work on the Allocations DPD.	483
14. HO1 - Miscellaneous	3. The Council should be asked to explain why the numbers of housing sites discussed in the Draft rely on a quantity of sites where highways/access constraints show no evidence they are	This is a baseless comment from an objector to the Sty Lane site. Sty Lane is a sustainable location for development – a principle which has been accepted by both the Planning Inspector who held a recent inquiry and by the Secretary of	483

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	capable of being overcome e.g. 420 houses, Sty Lane, Micklethwaite. Such sites may prove undeliverable.	State. Access issues relating to the site are perfectly capable of being resolved and it is hoped that site will finally gain planning permission and begin development in the near future.	
14. HO1 - Miscellaneous	4. The CS indicates a requirement of 42,100 new homes for the district over the period 2013 to 2030. Until the CS and Development Plan is adopted the Government is requiring under the NPPF (para 49) for Councils to evidence a deliverable housing supply of 5 years otherwise a potential developer on appeal may be successful in gaining permission for a scheme even if this may encroach Green Belt. "Net completions over the period 2004-2013 allowance" has been made (Table HO1 p157) leaving a shortfall to 2013 of 7,687 homes. This shortfall should be spread over the life of the plan (2014-2030) and not merely the first five years of the plan.	There are a large number of errors and inaccuracies in this objection. Firstly Policy HO1/B does not seek to state the position with regards to the 5 year land supply. That matter is dealt with in the SHLAA. Secondly Government policy is that Council's must maintain a 5 year land supply of deliverable sites at all times on an ongoing basis – not as the objector states only in the period until a Local Plan is in place. Thirdly the objector is incorrect in stating that Government policy is that green belt sites can be developed where a 5 year land supply is not demonstrated. Finally the shortfall of unmet development and how it is accounted for in the 5 year land supply calculation is again made specifically clear within the Council's statement within the SHLAA. The Sedgefield approach whereby the shortfall is added to the 5 year land requirement is the one adopted in the SHLAA and is in the Council's opinion the correct approach bearing in mind appeal decisions on S78 appeals across the country.	170
14. HO1 - Miscellaneous	5. It is not sound to develop population projections on recent migration levels when the Government is currently seeking to reduce levels by tens of thousands, particularly in the medium to longer term – from 2020 onwards. There is the danger that valuable sites such as Green Belt could be lost prematurely to housing if the assumptions of high international migration prove incorrect.	It would be totally unsound and unjustified to base the housing requirement on the goals and targets set by politicians. The requirement has to be based on actual evidence. There is no evidence at present that the level of national net migration is declining. Finally the Government itself requires Council's to utilise the latest population projections issued by the Government's agency, the Office for national Statistics, which the Council has done. These projections include trend based projections of future migration which in the absence of any other evidence to the contrary provide a far more reliable evidence than party political statements.	114
14. HO1 - Miscellaneous	6. Several objections as detailed below refer to the type of housing needed in the district: <ul style="list-style-type: none"> • The main housing need is for low cost housing 	It is not clear what relevance these points have to the assessment of overall district wide housing need. The type of housing required to meet need is assessed within the	421, 498

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	<p>of 1/2/3 bedrooms for those on low incomes and low capital.</p> <ul style="list-style-type: none"> • The housing target is mostly directed at lower socio-economic groups, and will do little to attract the professional classes to the City 	Council's SHMA.	
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POLICY HO2 – STRATEGIC SOURCES OF SUPPLY			
	Support for the Approach Set Out in Policy HO2		
HO2	1. We support the aims and objectives of HO2	Support noted.	188
HO2	2. Policy HO2 indicates the strategic sources of housing supply. It is noted within Paragraph 5.3.22 that this context reflects the Council's key regeneration priorities and programme particularly those which are geared towards delivering the regeneration and development of the Canal Road Corridor. My clients support this approach.	Support noted.	407
HO2	3. It is agreed that strategic sources of housing land supply required to meet the dwelling targets set out in Policy HO1 should focus on housing completions and existing commitments, alongside unimplemented but deliverable or developable allocated or safeguarded sites within existing RUDP in accordance with the approach advocated by the NPPF. In this regard it is important that a thorough and realistic review of unimplemented allocated sites within the RUDP is carried out to ensure that any that are carried forward are genuinely available and deliverable during the plan period.	The comments are noted. In line with Government guidance the SHLAA has and will continue to assess site deliverability.	495
HO2	4. CRUVL strongly support this approach to	The comments are noted.	510

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	delivering the overall housing target and the New Bolton Woods site is key in ensuring the Council meet its housing target.		
Objections to the Approach Set Out in Policy HO2			
1. HO2 - Windfall	1. Para 5.3.24 – whilst this sets out existing sites and unimplemented allocations it takes no account of consents which may have expired since the last update in 2013. It places heavy reliance on windfalls, mill conversions and city centre flats.	This is not correct. Paragraph 5.3.24 simply reports on the data within the AMR on permissions and unimplemented allocations. It is included in the Core Strategy for context and completeness only. The Core Strategy's policies are based on the much more detailed analysis within the SHLAA which includes analysis of the delivery of potential sites. Each SHLAA update examines the housing register and sites where planning permission has expired (which are above the qualifying size threshold of 5 units) are included in the study. However the reasons why those permissions were not implemented are examined in the SHLAA and if there are reasons why new homes are not considered deliverable those sites do not appear within the SHLAA trajectory. The SHLAA capacity totals includes no contribution from windfall sites and Policies HO2 and HO3 seek to identify in full the land supply to meet the housing need set out in Policy HO1. In other words there is no reliance placed on windfall within the proposed housing supply for the plan period.	108
2. HO2 - Existing commitments with planning permission (Policy HO2/A2)	1. Part 2 A of the policy should be amended. To be consistent with national planning policy (paragraph 47 and footnote 11 of the NPPF), it is maintained that part 2 should refer to deliverable existing commitments with planning permission in recognition of the fact that some sites with historic planning permissions may no longer be viable or there may not be demand for the types of units for which planning permission was granted	The plan's strategy is based upon a land supply assessment which has assessed the deliverability of sites including existing commitments and the need for sites to be deliverable is further emphasised by the wording of other policies such as HO7. The proposed change is therefore not needed in order to render either the plan as a whole or Policy HO2 sound.	396, 397, 400, 402
3. HO2 (A4) - Safeguarded Land	1. Support the identification of these sites as a source of supply,	Support noted	396, 397, 400, 402
3. HO2 (A4) - Safeguarded Land	2. Policy HO2 does not identify new safeguarded land sites as a potential source of supply to ensure	This matter is not relevant to Policy HO2 which is solely concerned with supply to meet housing need of 42,100 new	396, 397, 400, 402

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	<p>the housing requirement can be met in the long term, without the need to review the extent of the Green Belt again. This is in conflict with the NPPF paragraphs 83 and 85. New safeguarded land sites should be identified as a source of strategic housing land supply set out in Policy HO2</p>	<p>homes within the plan period. The question of whether additional land is required to add new safeguarded land and therefore ensure a green belt boundary which lasts beyond the plan period is a matter for Policy SC7 which sets out the Council’s policy on green belt.</p>	
<p>4. HO2 - Land Supply / SHLAA</p>	<p>1. The actual evidence on supply is that there is a delivery gap and that the SHLAA sites have not been sufficiently tested to a point where it can be concluded that all sites are available, suitable and deliverable. Sample sub area assessments of SHLAA sites demonstrate that some smaller urban sites are unlikely to be deliverable due to a mix of constraints that will be extremely difficult to resolve.</p> <p>Work on applications in the Bradford District has demonstrated that access, topographical and other constraints also limits site net dwelling yields, often leading to a net density below the assumed 30/hectare.</p>	<p>It is difficult to respond in detail to this objection since no specifics are given as to the sites in question where it is alleged that delivery, or delivery in the early part of the plan period is unlikely or where assumed yields might not be delivered. Either the objector has done some analysis but declined to be specific which is very unhelpful or they have arrived at the conclusion with no evidence or analysis on which to base it.</p> <p>This mirrors to an extent the unconstructive approach taken by the housing developers who were part of the SHLAA Working Group. At the conclusion of the SHLAA update, and having raised no specific objections to the site appraisal methodology and having taken part in commenting on site assessments throughout the process, the working group members were asked to comment upon and endorse the final report. The response of the housing developers was to state that they disagreed with some of the site assessments, particularly sites which were presumed to be deliverable in the first 5 years but when asked to identify which sites they were (so that the Council could reassess those sites and negotiate if possible a resolution) they refused to do so.</p> <p>On deliverability, the Council considers that the SHLAA has undertaken a robust assessment of land supply and would point out that the SHLAA Working Group members, which for the first SHLAA included the objector (Dacres), approved the methodology for the study. The methodology remained broadly the same for the second SHLAA.</p>	<p>447</p>

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	<p>The conclusion from this broad analysis of supply is that the supply gap may be larger than currently anticipated. While we do not challenge the overall soundness of this policy we do conclude that more work is necessary to justify the level of supply achievable from some of the component sources.</p>	<p>As far as yields and densities are concerned, again the SHLAA methodology for determining potential site yields was signed off and agreed with the Working Group was as follows:</p> <ol style="list-style-type: none"> 1. Where there was no current and live planning consent in place the SHLAA placed the site in one of a number of density bands. The density band applied depended on the site, location and envisaged type of housing which would be developed. There was also scope for adjustments to the assumed yield if site specific information (such as physical constraints, topography etc) indicated an alternative result. It should be noted that the density bands and approach to assigning sites to the bands was also discussed, negotiated and agreed with the working group; 2. Where a live consent was in place the assumed yield in the SHLAA was taken directly from the relevant planning application; <p>The Council regularly monitors the yields within recent planning consents. Such monitoring and ‘real life’ data helped informed the density bands which were used in the SHLAA.</p> <p>Monitoring has been undertaken again as part of the third SHLAA and the evidence suggests the SHLAA 2 density assumptions are reasonable as the majority of recent approvals have been either at or above the yield levels assumed within the SHLAA.</p> <p>As far as total supply is concerned, the second SHLAA includes a total district wide capacity which is well in excess of the proposed housing target so in that sense it is not true that there is a district supply gap.</p>	
4. HO2 - Land Supply / SHLAA	2. Para 5.3.29 states that " <i>The compromise approach was therefore to discount only those sites</i>	This comment is wrong and misunderstands both the nature of the SHLAA and the land supply and the nature of plan	394

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	<p><i>where national policy would be reasonably unequivocal that development could not place such as in areas of international wildlife importance or highest risk of flooding".</i></p> <p>This statement confirms our worst fear: namely that any future development after 2030 could only be accommodated on sites such as in areas of international wildlife importance or highest risk of flooding.</p>	<p>preparation.</p> <p>Firstly current national planning guidance would in many cases rule out development in such designated areas and thus unless national planning policy changes this would continue to be so. Secondly neither the objector nor the Council can say now what the future situation will be with regard to either the number of new houses needed when the next but one local plan is prepared nor the scale and nature of the remaining land supply to meet that need.</p> <p>The SHLAA represents a snapshot of land supply at the point of preparation. There is therefore opportunity for further land to come forward within or adjoining the built up area which is not within the SHLAA update or for a contribution from land which is within the current SHLAA but which for one reason or another is not currently deliverable. These new land sources would not necessarily be caught by the very limited range of designations which were used to screen out sites as unsuitable.</p>	
<p>4. HO2 - Land Supply / SHLAA</p>	<p>3. Examining Table HO2 we see that only 20,471 of the planned 42,087 dwellings can be accommodated on SHLAA sites that do not have policy constraints. We accept that, in some cases, policy constraints may have to be compromised; but in this Plan over half of the entire housing requirement needs policy constraints to be compromised. Such an approach is plainly flawed, because it demands that long-established policy constraints, put in place for sound reasons to promote sustainability and to protect and enhance environmental and cultural amenity, be cast aside on a wholesale scale.</p>	<p>This is incorrect and misunderstands both the SHLAA and the nature of the designations included as ‘policy constraints’.</p> <p>In the SHLAA the range of designations used to define sites with ‘policy constraints’ include policies which do not necessarily rule out development under the current RUDP. In many cases these designations will merely affect the layout, design or scale of development. Examples include conservation areas and TPO’s. Even the open space designations within the current RUDP do not always rule out development. Another example is flood risk zones 2 and 3a – these are recorded as ‘policy constraints’ in the SHLAA but the national and local policy approach to such areas does not necessarily rule out development in these zones.</p>	<p>394</p>

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		The SHLAA also explains that in many cases such designations only affect parts of those sites. Where such sites are affected in part by designations, the whole of that site's capacity is included in the 'policy constraint' category as the Council cannot at this stage say how such sites would be developed and how sites would be laid out and where on those sites the new homes as opposed to roads, open spaces and landscaping would be placed.	
4. HO2 - Land Supply / SHLAA	4. We see no analysis of the potential scale of sites which may be much more suited to fulfilling spatial objectives and the Principles for Sustainable Housing Growth set out Figure HO1, but which are not identified in the SHLAA.	The SHLAA provides a comprehensive assessment of the available and deliverable land supply which accords with the Government Practice Guidance in place at the time of preparation. It is not clear what the objector is referring to nor what sites are being referred to. If the objector is aware of any potentially suitable, available, viable and deliverable sites which are not within the current SHLAA they should submit them to the Council for inclusion in the next SHLAA update.	394
4. HO2 - Land Supply / SHLAA	5. Para 5.3.25 and Table HO2 – these refer to the AMR and SHLAA both of which were last updated nearly a year ago yet further sites have been submitted in the Call for Sites which have not yet been added to the SHLAA list and sites in the AMR 2012 could now no longer have extant consent. These documents need to be updated in order for a sound plan to emerge.	The SHLAA is a snapshot assessment with a given base date. There will always be a limited number of new sites which emerge either as call for sites submissions or via planning consents – there will be picked up in the following SHLAA update. Each time the SHLAA is updated a few new sites are added while some drop out of the delivery trajectory where they are considered no longer available or deliverable. The absence of a handful of sites, submitted after the cut off point, from the second SHLAA is unlikely to make any difference to the strategic pattern of land supply. Moreover the Council are indeed currently undertaking a further update to the SHLAA and the data from that work will be available to for all participants at the Core Strategy EIP.	
4. HO2 - Land Supply / SHLAA	6. Land at Fardew Golf Course was submitted to the 2013 Call for Sites for inclusion in the SHLAA. However, the evidentiary material presented alongside the Publication Draft CS, in the form of the SHLAA, fails to account for the site as outlined at Appendix 1. A number of the Council's studies	The Council strongly disagrees with the points raised. The Core Strategy is a strategic document and the omission of just 1 site in a study which has assessed around 1000 sites makes no material difference to the land supply position and the resultant housing distribution.	512

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	<p>on settlement growth utilise the SHLAA as base data. With the failure to include our client's land, we consider that the Core Strategy is not based on an up to-date evidence base and is therefore not the most appropriate strategy.</p>	<p>SHLAA's are updated on a regular basis and as such the database of sites is in constant flux. The site in question was submitted in too late for inclusion in the second SHLAA but is being assessed as part of the current and further update. Contrary to the indication made by the objector, there was no formal call for sites exercise in 2013. However the Council receives and welcomes all submissions and as indicated above these are included in the SHLAA update. If the evidence base was not considered up to date on the basis which the objector alludes then the evidence base could never be up to date as there are always new sites proposals coming in.</p>	
4. HO2 - Land Supply / SHLAA	<p>7. Paragraph 5.3.33 identifies the Shipley and Canal Road Corridor Area Action Plan as an area based initiative and growth area. My clients welcome this but consider that there needs to be more explicit recognition of their land asset at Bolton Woods Quarry as part of the strategic delivery of these requirements within the Core Strategy thus recognising the significance of the site.</p>	<p>The comments are noted however the Core Strategy is a strategic document and it is not considered necessary to mention in the document individual potential allocations which are likely to form part of the forthcoming DPD.</p>	407
5. HO2 (B1) - Designated growth areas	<p>1. Evidence from other local plan core strategies which include large area based growth initiatives suggest that there is a need to provide a clear and expanded strategic framework policy statement with supporting evidence in order to demonstrate the delivery potential, infrastructure and other requirements which will lead to a high degree of certainty on the housing capacity which is achievable. We are aware of the on-going work on the City Centre and Canal Road Area Action Plans and the Holme Wood informal Neighbourhood Plan. The strategic frameworks for these plans should be incorporated in summary form in the submission draft CS with schedules of</p>	<p>As the objector acknowledges the City Centre and Shipley and Canal Road Corridor AAP's and the Holme Wood urban extension have been informed by a considerable body of work, evidence and consultation. Details of required infrastructure have as necessary been incorporated within the Council's Local Infrastructure Plan (LIP). The Council considers it unnecessary to repeat sections of these documents within the body of the Core Strategy. Moreover some of those details may well change as work on these area specific programmes progresses further.</p> <p>Planned infrastructure is currently set out in the Infrastructure Delivery Schedule of the LIP. This will be updated by the CBMDC Planning Service when necessary, to incorporate</p>	447

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	<p>infrastructure requirements and delivery programmes. Without this clarity there is some doubt on the delivery capacity intended for these areas and their major contribution to the overall requirement total.</p> <p>While we do not challenge the overall soundness of this policy we do conclude that more work is necessary to justify the level of supply achievable from some of the component sources.</p>	<p>relevant infrastructure providers' future plans.</p> <p>The LIP must be able to respond to changing needs and circumstances over the plan period. Consequently it is a 'live' document and will be updated taking account of all the changes as they come forward.</p> <p>Further work is ongoing to support the development of an urban extension at Holme Wood. This will inform the detailed consideration of the allocation of land within the Allocations DPD.</p>	
<p>5. HO2 (B1) - Designated growth areas</p>	<p>2. Burley in Wharfedale should be re-instated as a Local Growth Centre in the settlement hierarchy and a housing growth area Policy HO2 in accordance with the preferred approach identified within the Core Strategy Further Engagement Draft (CSFED) on the basis of</p> <ol style="list-style-type: none"> 1) the settlement's continued sustainability and ability to accommodate significant housing growth. 2) Deficiencies in land supply and therefore doubts over whether targets in Bradford City Centre, Bradford SE can be delivered 3) Deficiencies in the HRA which the Council acknowledge led to a re-adjustment away from certain settlements and consequent increase in the targets for the Regional City. 	<p>It is acknowledged that Burley In Wharfedale would be a relatively sustainable location for some housing growth if other factors suggested that growth in the area would be an appropriate option. This is particularly the case when comparing Burley with some of the other settlements within the fourth tier of the settlement hierarchy.</p> <p>However the Council are required to propose a strategy for meeting housing need which would be acceptable in terms of the potential direct and indirect impacts on the S Pennines SPA & SAC. The Council were therefore justified in looking to reduce the scale of growth within the 2.5km buffer zone within which Burley is located. As a result of the reduction in the housing target for Burley, the Council considers that it cannot be identified as a growth area in Policy HO2 and should not be designated as a Local Growth Centre in Policy SC4.</p> <p>With regards to land supply and targets elsewhere:</p> <ol style="list-style-type: none"> 1) The target assigned to the city centre was set above the level of capacity indicated within the SHLAA Update based on the Council's knowledge of additional capacity which the Council were confident could come forward. This included additional capacity from higher yields on 	<p>495</p>

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		<p>some of the SHLAA sites already in the trajectory and also a number of sites with potential which were for a number of reasons not captured within the SHLAA 2 trajectory. Preliminary work on the third SHLAA indicates a significant increase in potential developable capacity within the City Centre to a level well above the Core Strategy Publication Draft target;</p> <p>2) The total capacity within Bradford SE in the SHLAA update at 6,607 dwellings, actually lies well above the proposed Core Strategy target</p> <p>In conclusion land supply in itself does not indicate a need to increase the housing target for Burley nor does it indicate a need to reduce it in the Regional City.</p>	
<p>5. HO2 (B1) - Designated growth areas</p>	<p>3. The scale of growth proposed for Queensbury and Thornton could amount to 'urban extensions'.</p>	<p>There are no urban extensions proposed within the CSPD for Queensbury or Thornton. Smaller scale local green belt deletions are however proposed.</p> <p>The Council, in preparing the Core Strategy has utilised the following definition for 'urban extensions' and 'local green belt releases':</p> <p>Urban extensions are defined as single major green belt releases capable of accommodating over 1000 dwellings and likely to involve mixed uses and significant supporting infrastructure. At present the Core Strategy is only identifying one such extension, at Holme Wood.</p> <p>Local green belt deletions are defined as being releases from the green belt of a smaller scale and where the needs for supporting infrastructure are not as great.</p> <p>These definitions were included within the CSFED but could be added to the glossary of the CSPD to aid clarity.</p>	<p>394</p>

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Policy HO2 - Holme Wood Urban Extension			
HO2	A number of objections are made to the identification of Holme Wood as a growth area and urban extension:		
1. HO2 - Duty to Co-operate	<p>1. Alleged failures in the duty to co-operate:</p> <p>Failure in to agree the urban extension with Leeds and Kirklees and failure to discuss with Leeds loss of local amenity.</p> <p>Cross boundary agreement is needed to deal with matters such as traffic impacts.</p> <p>Failure to consult and co-operate with Pudsey pacer RC.</p>	<p>The Council has fully and comprehensively met its requirements under the duty to co-operate as far as the urban extension is concerned.</p> <p>Background paper 1 issued in support of the Publication Draft detailed the work undertaken under the duty to co-operate. A more comprehensive Duty to Co-operate Statement has been prepared in support of the submission of the Core Strategy. This sets out the ongoing positive approach to the Duty to Cooperate within the Leeds City Region.</p> <p>The statement makes clear the extensive engagement between officers and members on the Core Strategy's proposals. In terms of the proposed urban extension at Holme Wood there has been ongoing engagement with officers and lead members in both Leeds and Kirklees. The Core Strategy was amended following Further Engagement Draft in light of earlier comments by Leeds City Council. Leeds City Council and Kirklees have raised no formal objections to these proposals.</p> <p>It should also be noted that the joint working carried out at Leeds City Region level under the duty to co-operate has included discussion and assessment of each council's approach to green belt. There have been no objections by adjoining authorities to Bradford's approach to green belt and Bradford's need to release green belt land to meet its housing needs is also not unique in the Leeds City Region.</p>	193, 415, 422, 482
2. HO2 - Unclear Timeframes	1. There is no clear time frame given for the Urban Extension, and there are conflicting statements made in Council documents that indicate confusion	The extent of the urban extension would be considered as part of the allocations DPD. This would look to make the development allocations, designate any supporting	

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	as to how and when land for the Urban Extension would be released.	infrastructure and revised green belt boundary.	
3. HO2 - Need & Justification	1. Unless it can be shown that housing targets have an accurate foundation then the circumstances necessary to prevent damaging and unsuitable development will not exist;	It is not clear which targets are being referred to. Assuming the reference is to the district wide housing target then the Council believes that this has been based on a thorough, robust and objective assessment of need.	162
3. HO2 - Need & Justification	2. As the evidence base suggests a much reduced need for housing than that anticipated when the NDP was approved, it is a huge disappointment that Bradford's Core Strategy proposes an urban extension at Holme Wood	<p>Although there has been a reduction in the proposed district wide housing target between the Further Engagement Draft and Publication Draft this reduction is small and an analysis of the land supply shows that there is a huge and unbridgeable deficit in land supply without allowing for significant change to the green belt.</p> <p>There is no way that either the specific Bradford SE housing target or the wider target for the regional city could be accommodated without green belt change. This means that the proposed urban extension at Holme Wood will be just one of many areas of green belt release which will be required around the regional city.</p> <p>Finally it should be pointed out that since the Further Engagement Draft the Council has commissioned a Growth Assessment and that work has indicated that the SE Bradford Area would be a sustainable location for growth and an appropriate one for green belt release.</p>	162
4. HO2 - Conflict with RUDP and RSS	1. The proposal stands as a clear contradiction to earlier plans contained in Bradford's Unitary Development Plan, as well as those proposed in the Regional Spatial Strategy	This is largely irrelevant as the Council is required to produce a new plan and that plan is being produced in completely different circumstances, against a backdrop of massively higher housing need than was the case when the RUDP and RSS were produced. Moreover the plan is being produced against the backdrop of a different planning system, different government guidance and different evidence.	162
5. HO2 - Lack of / Flawed Consultation	1. There has been a lack of adequate consultation with local residents. There has been no consultation with Leeds residents despite the fact that some live	There has been extensive and appropriate consultation and engagement through out the preparation of the Core Strategy.	422, 482

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	<p>within one mile of the proposed development.</p> <p>The consultation process is flawed on two grounds:-</p> <ul style="list-style-type: none"> • The Tong and Holme Wood Neighbourhood Development Plan (NDP) and Local Development Framework Core Strategy Further Engagement Draft (LDF FED) were not available for public consultation concurrently. • The NDP was begun and completed in advance of the LDF FED and appears to have driven the LDF FED. The LDF FED should have informed the NDP 	<p>Work on the Core Strategy commenced in 2004. During its early preparation the Core Strategy was published for public consultation at the following key stages:</p> <ul style="list-style-type: none"> • Issues & Options (2007) • Further Issues & Options (2008) • Further Engagement Draft (2012) • Publication Draft (2014) <p>The Council has published ‘Engagement Plans’ and post consultation ‘Statement of Consultations’ for each stage identifying and recording details of each consultation.</p> <p>All consultation was undertaken in line with the Adopted SCI and relevant regulations in place at that time. Targeted consultation was undertaken on Holme Wood on the Further Engagement Draft Core Strategy.</p> <p>See response below setting out the basis for the neighbourhood Plan and the relationship to the Core Strategy.</p>	
<p>5. HO2 - Lack of / Flawed Consultation</p>	<p>2. Inaccurate and misleading designation of the Tong and Holme Wood Neighbourhood Development Plan:</p> <ol style="list-style-type: none"> 1. The NDP does not meet the requirements of the localism Bill. 2. Bradford Council did not meet the requirements of the Localism Bill in reforming the Tong and Holme Wood Partnership Board in order to develop the NDP. 3. The Draft Core Strategy makes an invalid claim for the validity of the Tong and Holme Wood Partnership Board NDP. 4. There was no true representation at local level. 	<p>The Tong and Holme Wood Neighbourhood Plan pre dates the Localism Act and has not been produced under its provisions and there are no proposals to seek to formally adopt the neighbourhood plan under the Localism Act.</p> <p>It was commissioned by the Council in 2010 and was prepared with the Holme Wood and Tong Partnership Board. The document was subject to several stages of public consultation.</p> <p>The Document looked at the options for the long term regeneration of the estate including redevelopment within and also opportunities for growth on the edge of the estate.</p>	<p>482</p>

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	<p>5. The majority of the local community have had little or no opportunity to articulate their response to consultation and have been disenfranchised in the process.</p>	<p>The Neighbourhood Plan was considered and endorsed by the Council in January 2012. The document has also informed ongoing service delivery within the estate as well as being a material planning consideration on development decisions.</p> <p>The Neighbourhood Plan and the consultation was used to inform the emerging Core Strategy in particular the opportunities for longer term growth including an urban extension.</p> <p>The relevant statements of engagement set out the nature and extent of engagement in the preparation of the Core Strategy. Targeted consultation was undertaken with the support of Planning Aid on Holme Wood with local communities.</p> <p>There was also extensive consultation and engagement in the preparation on the neighbourhood Development Plan.</p>	
6. HO2 - Loss of Green Belt	<p>A number of objections to the proposed Holme Wood Urban Extension are made relating to the loss of green belt and green belt policy:</p>		
6. HO2 - Loss of Green Belt	<p>1. It is suggested that there are no exceptional circumstances, as required buy the NPPF, to warrant this green belt loss.</p>	<p>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.</p> <p>Having established that there is a need for green belt deletions it is important that deletions are focused in the most sustainable locations and in reasonable proximity to the areas</p>	<p>130, 162, 185, 194, 379, 412, 415, 422, 424, 482</p>

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		<p>of greatest need i.e. the Regional City of Bradford. The Bradford Growth Assessment 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, and should be a particular focus for such growth.</p>	
6. HO2 - Loss of Green Belt	<p>2. Concerns over the proposal due to the loss of green belt between Leeds Bradford, possible coalescence between Leeds and Bradford.</p>	<p>Moreover the Growth Assessment and the work carried out by consultants and as part of the Neighbourhood Development 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 regards to regeneration and investment which would be secured as part of the delivery of the urban extension.</p>	
6. HO2 - Loss of Green Belt	<p>3. The loss of green belt protected land should not take place unless there is no alternative, yet we do not see any sign of this having been a priority with those who are making these proposals. Indeed the prior inclusion of this in the NDP indicates a lack of genuine commitment to green belt protection by Bradford Council.</p>	<p>The Council disagrees. It has been clear for several years as the Core Strategy has evolved that there is a large and unbridgeable gap in the supply of deliverable land to meet the districts housing needs in non green belt locations.</p> <p>Policy HO2 together with the Council's Housing Background Paper clearly set out the evidence which indicates that there are exceptional circumstances which justify releasing green belt to meet the objectively assessed needs for new homes in the district.</p> <p>The Housing Requirement for the plan period cannot be met in full without the use of land currently designated as Green Belt. Based upon the SHLAA update 2013 there may be a need for up to 11,000 dwellings to be delivered on land currently within the Green Belt.</p> <p>Having established that the land supply in non green belt</p>	415, 482

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		<p>locations is not available to meet the districts needs the Council have then commissioned a District wide growth assessment. This has confirmed both that there are sustainable locations within the green belt for growth and that there are areas where the green belt can be changed without leading to the undermining of the role of the green belt either locally or strategically.</p> <p>NPPF paragraph 47 makes clear that Local Plans should meet their objectively assessed housing need in full. Paragraph 82 allows for the review of Green Belt boundaries under exceptional circumstances through the preparation of the Local Plan.</p> <p>Policy HO7 makes clear that the Local Plan seeks to minimise the use of green belt land.</p>	
6. HO2 - Loss of Green Belt	4. Each of the 5 purposes of green belt within the NPPF would be compromised by the proposed urban extension.	<p>The Council disagree with this assertion. The Growth Assessment has supported this location for an urban extension suggesting that it would be a sustainable location for growth and one where development would not unduly harm the strategic functioning of the green belt in this area.</p> <p>The detailed boundary would be defined in the Allocations DPD in line with Core Policy SC7. The methodology for any green belt review will be subject to separate consultation as part of first stage on engagement on the Allocations DP. In line with SC7 this would have regard to the purposes of green belt as well as the strategic function of green belt.</p>	415, 422, 482
6. HO2 - Loss of Green Belt	5. We are not aware of Bradford Council having produced a Green Belt policy that has a cogent strategy for the redefining of greenbelt – nor are we aware of any negotiation taking place with neighbouring authorities to reach common	<p>This is incorrect. Policy SC7 within the Core Strategy sets out the Council’s approach on green belt. Background paper 1 issued in support of the Publication Draft details the work undertaken under the duty to co-operate.</p>	415, 482

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	<p>agreement on this.</p>	<p>A more comprehensive Duty to Co-operate Statement has been prepared in support of the submission of the Core Strategy. This sets out the ongoing positive approach to the Duty to Cooperate within the Leeds City Region. Green belt was explicitly considered as part of this process and is included in the LCR Duty to cooperate issues table approved by Portfolio Holders Board in October 2014 (see Appendix 4 to Duty to Cooperate Statement)</p> <p>The statement makes clear the extensive engagement between officers and members on the Core Strategy’s proposals. In terms of the proposed urban extension at Holme Wood there has been ongoing engagement with officers and lead members in both Leeds and Kirklees. The Core Strategy was amended following Further Engagement Draft in light of earlier comments by Leeds City Council. Leeds City Council and Kirklees have raised no formal objections to these proposals.</p> <p>It should also be noted that the joint working carried out at Leeds City Region level under the duty to co-operate has included discussion and assessment of each council’s approach to green belt. There have been no objections by adjoining authorities to Bradford’s approach to green belt and Bradford’s need to release green belt land to meet its housing needs is also not unique in the Leeds City Region.</p>	
<p>7. HO2 - Impacts on Environment</p>	<p>1. Concerns over the loss of countryside and of a green lung; loss of an area used by many for leisure and recreation; and failure to reflect the special landscape character of the Tong valley.</p>	<p>The detailed boundary will be defined in the Allocations DPD in line with Core Policy SC7. The methodology for any green belt review will be subject to separate consultation as part of first stage on engagement on the Allocations DP. In line with SC7 this would have regard to the purposes of green belt as well as the strategic function of green belt.</p> <p>The Sub area Policy BD1 criterion E1 recognise the importance of the countryside between Bradford and Leeds in</p>	<p>130, 162, 185, 194, 356, 379, 415, 422, 424, 482</p>

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		context of the development strategy and will inform any site selection process as well as green belt change.	
7. HO2 - Impacts on Environment	2. Concerns over the impact on historic buildings, ancient woodland at Kit Wood, Park Wood and Black Carr Wood.	Based upon the evidence in support of the Core Strategy the Council believes an urban extension can be delivered in this location without unacceptable harm to key historic and biodiversity assets. The detailed site allocations will be subject to further assessment and consultation as part of the Allocations DPD.	185, 194
7. HO2 - Impacts on Environment	3. Impact on the historic setting of Tong Village on one side of the valley and the Fulneck Moravian settlement on the other. Impact on the quiet character of Fulneck Moravian Settlement.	See response above.	194, 379, 415, 482
7. HO2 - Impacts on Environment	4. The proposed urban extension fails to take account of the Tong Conservation Assessment.	See response above.	194
8. HO2 - Infrastructure	1. There is no attempt in either the NDP or the Core Strategy to show how any of the infrastructure requirements of such a large new community for it to be sustainable would be met. Concerns over health services, schools, water and sewage disposal. The development would have significant impact upon the Leeds wards of Farnley & Wortley, Morley North and Pudsey, but there are no sign of this being recognised or planned for.	Infrastructure is assessed at this strategic level as part of the Local Infrastructure Plan which has been published on the Council's website. Detailed proposals for infrastructure will be developed as part of the wider Local Plan process and this can only be done once the detail and timing of development proposed is finalised which is not the case at the moment. The Core Strategy identifies key infrastructure requirements in support of the Urban extension in the sub area policy in particular criterion BD1 F6 and BD2 E in relation to transport. These are actively being developed as part of the West Yorkshire Transport Fund. Wider infrastructure requirements can be addressed as part of the detailed Allocations work. The Neighbourhood Development Plan did consider the local infrastructure issues and as part of the delivery of the neighbourhood Plan the Council is in contact with key infrastructure partners in order to align infrastructure in	130, 185, 356, 415, 424, 482

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		support of growth on the area.	
9. HO2 - Roads & Congestion	1. Concerns are raised 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>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p> <p>Improvements to the highway network infrastructure will provide access to the Urban extension at Holme Wood and improve connections to the motorway network. The transport element of Sub-area Policy BD1 aims to develop critical road and public transport infrastructure to ensure the viability and delivery of housing and economic growth in Bradford.</p> <p>Details of a specific transport scheme/s will be available as part of the more detailed site allocations work, in subsequent allocating Development Plan Documents. These will determine more local improvements and mitigation measures required in relation to the Holme Wood extension.</p>	162, 185, 193, 422
9. HO2 - Roads & Congestion	2. The proposal will lead to more congestion particularly along Tong Street.	<p>Policy TR1 sets out the broad principles to achieve a framework for development across the District and is compliant with National Planning Policy Framework.</p> <p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan, West Yorkshire Plus Transport Fund and West Yorkshire Local Transport Plan set out a programme of strategic and local transport improvements which will support growth and development. Specifically, highway capacity improvements on Tong Street and the development of a South East Bradford Access Route to serve the urban extension at Holme Wood have been identified as projects within the West Yorkshire Plus Transport Fund programme.</p>	130, 356, 415, 422, 424, 482

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		<p>The location of new development will aim to maximise opportunities for travel by sustainable modes.</p> <p>Further work will be undertaken as part of the more detailed site allocations work to determine more local improvements and mitigation.</p> <p>The Council is actively engaged with Leeds City Council, other adjacent Local Authorities, WYCA, the Highways Agency and Network Rail under the Duty to Co-operate and will continue to do so as part of the work on the more detailed Development Plan Documents to identify appropriate mitigation measures to cross boundary transport issues.</p>	
9. HO2 - Roads & Congestion	<p>3. There is confusion about Bradford’s intentions regarding road provision for the Urban Extension. There is conflicting evidence regarding a proposal to build a new highway link road from Westgate Hill to Thornbury, or to only provide the new community with an access road. If it were only an access road, the effect of traffic growth through Holme Wood would be unacceptable. If a link road were to be built there would be even further devastating major green belt loss, and serious ecological threat to the important ancient woodland of Black Carr Woods. Such a road would require agreement and support from neighbouring authorities</p>	<p>Improvements to the highway network infrastructure will provide access to the Urban extension at Holme Wood and improve connections to the motorway network. The transport element of Sub-area Policy BD1 aims to develop critical road and public transport infrastructure to ensure the viability and delivery of housing and economic growth in Bradford</p> <p>Specifically, highway capacity improvements on Tong Street and the development of a South East Bradford Access Route to serve the urban extension at Holme Wood have been identified as projects within the West Yorkshire Plus Transport Fund programme.</p> <p>Details of specific transport schemes will be available as part of the more detailed site allocations work, in subsequent allocating Development Plan Documents. These will determine more local improvements and mitigation measures required in relation to the Holme Wood extension.</p>	130, 415, 482
9. HO2 - Roads & Congestion	<p>4. The rural farm roads that lead to Tong or Tyersal are entirely unsuited to carrying the increases in</p>	<p>Improvements to the highway network infrastructure will provide access to the Urban extension at Holme Wood and</p>	130, 415, 482

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	traffic that would result from the Urban Extension, and further substantial traffic increases in Tong Lane through the Tong Conservation Area would be highly undesirable.	improve connections to the motorway network. The transport element of Sub-area Policy BD1 aims to develop critical road and public transport infrastructure to ensure the viability and delivery of housing and economic growth in Bradford Details of specific transport schemes will be available as part of the more detailed site allocations work, in subsequent allocating Development Plan Documents. These will determine more local improvements and mitigation measures required in relation to the Holme Wood extension.	
9. HO2 - Roads & Congestion	5. It will also add to the traffic problems at the Drighlington crossroad in Morley North Ward and on the B6154 (Tong Road) through Farnley, Upper Wortley, Armley and down to the Armley Gyratory	Improvements to the highway network infrastructure will provide access to the Urban extension at Holme Wood and improve connections to the motorway network. The transport element of Sub-area Policy BD1 aims to develop critical road and public transport infrastructure to ensure the viability and delivery of housing and economic growth in Bradford Details of specific transport schemes will be available as part of the more detailed site allocations work, in subsequent allocating Development Plan Documents. These will determine more local improvements and mitigation measures required in relation to the Holme Wood extension.	130
10. HO2 - Miscellaneous	1. The proposals will not alleviate the city's own need for new homes but will provide a dormitory fringe of householders drawn from Leeds and Kirklees.	The Council disagrees with this assertion.	162
10. HO2 - Miscellaneous	2. PPRC further believes that community cohesion could be weakened given the potential of the proposed extension becoming a 'motorway settlement'.	The Council disagrees with this assertion. The objector provides no reasoning to justify the comments.	356
10. HO2 - Miscellaneous	3. To describe the new development as a 'Holme Wood Urban Extension' is misleading. We believe that the main bulk of this new development will not assist Holme Wood to become a more socially and economically mixed community, and may well	The Council's proposals include a balanced package of development, investment and environmental improvements for the wider Holme Wood area and will level in investment which would not otherwise materialise. It is unclear how the objector reaches the conclusion that the NDP or Core Strategy would	130, 417, 442, 482

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	further damage its potential.	damage the existing Holme Wood area.	
	Policy HO2/B.3 – Green Belt		
1. HO2 (B3) - Support for Green Belt Release	1. Countryside support the need for local green belt releases to be brought forward where other sources of supply have proved insufficient within the relevant settlement or strategic planning sub area. This will allow sites in sustainable locations to be brought forward within the plan period, helping to ensure the council will meet the strategic delivery targets set within Policy HO1.	Support noted.	517
1. HO2 (B3) - Support for Green Belt Release	2. Countryside remain supportive of this policy, but an early review of green belt in locations identified for growth, such as Silsden in its role as a Local Growth Centre, should take place in order that a strategic and comprehensive view is taken with regards to the most effective way to deliver the housing needed within the settlement.	Policy SC7 sets out the approach to green belt review.	517
1. HO2 (B3) - Support for Green Belt Release	3. The policy support afforded to review of Green Belt boundaries as set out within Policy HO2 is supported, and considered necessary to ensure that the Core Strategy is both effective and positively prepared. Indeed, it is likely that more housing than that identified within the supporting text to policy HO2 will need to be delivered on previously Green Belt sites in light of NLP’s identification of a higher overall housing figure. As drafted, the policy provides sufficient flexibility to facilitate this.	The Council sets out in the text an indication of the scale of contribution needed from the green belt to meet the overall district wide housing requirement. This figure may turn out to be a little higher or a little lower depending on the interplay of a wide variety of factors. However the Council does not agree with the housing need assessment by NLP or that the district wide housing requirement should be increased.	495
2. HO2 (B3) -Duty to co-operate	1. We consider the plan to be unsound in that it includes the provision to build up to 11,000 new dwellings on Green Belt land across the district. We consider the plan to fail on the duty to cooperate as the provision of these dwelling on Green Belt land is in contravention of the entire reasoning behind the establishment of Green Belt in the first place and that some of the proposals have been opposed by	The comments are incorrect on a number of fronts. Firstly Government policy specifically allows for land to be released from the green belt as part of the process of preparing a Local Plan where exceptional circumstances are demonstrated. The Plan cannot therefore, as implied by this objector, be considered automatically unsound merely by virtue of the fact that it is proposing the release of land from	192

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	<p>neighbouring authorities (in the case of Holme Wood extension) and by parish and town councils within the Bradford District.</p>	<p>the green belt to meet objectively assessed housing need.</p> <p>The plan has clearly demonstrated that exceptional circumstances exist. There is a large and unbridgeable gap in available land supply from sources if green belt sites are excluded. Without the use of green belt land the district will not be able to meet the needs of its expanding population. Moreover the Council contends that there are a number of green belt sites, particularly around the main urban areas, which are both in sustainable locations and whose development would not fundamentally undermine the role and function of the green belt in those areas. This is a view that has been endorsed and underlined by the work carried out as part of the Bradford Growth Assessment.</p> <p>The objector also misinterprets the duty to co-operate. The joint working which has taken place at Leeds City Region level under the duty to co-operate has included discussion and assessment of each council's approach to green belt. There have been no objections by adjoining authorities to Bradford's approach to green belt and Bradford's need to release green belt land to meet its housing needs is also not unique in the Leeds City region.</p> <p>Moreover Leeds City Council have not, as implied by this objector, made formal representations objecting to the Core Strategy Publication Draft's green belt proposals. Furthermore even if it had the mere existence of an objection by a council, or parish council to the use of green belt does not itself render that proposal to utilise green belt unsound or mean that the duty to co-operate has not been met - the duty to co-operate is not a duty to agree.</p>	
<p>3. HO2 (B3) -No need for Green Belt Release /</p>	<p>1. BRAiD is aware that the Council argue that they cannot meet their land supply requirements without releasing land from the green belt. They are also</p>	<p>The Council disagrees with the comments which the objector makes. The objector's views are completely unsubstantiated. The Council are required to develop a strategy which is both</p>	<p>393</p>

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other land supply sources	aware of the Council's view that the identified sites can be built on without damaging the green belt. We do not agree with this. There are better mechanisms for focusing development where it is needed other than simply allowing the market to run wild. If these, more preferable, methods were employed the Council could probably obviate the need for green belt losses.	sustainable and which will deliver the number of new homes needed. The objector has failed advocate any other viable alternative and also seems to make the erroneous assumption that all green belt development is unsustainable. The Bradford Growth Assessment alone indicates that there are many locations within the green belt where development would be both sustainable and where the overall functioning of the green belt would not be significantly harmed.	
3. HO2 (B3) -No need for Green Belt Release / other land supply sources	2. However, accepting the Council's premise, and assuming that the sites could be developed without harming the green belt, the problem then is that, once these sites are released, they are lost forever to development. So in 2030, if similar arguments are used to justify further green belt destruction, then the identified sites will inevitably be in places where their loss will be much more damaging. (The more suitable, less harmful, sites having already been consumed by the 2015 plan.)	Neither the Council nor the objector can say at this point, many years in advance of a future Local Plan, ether what the scale of need for housing will be at that point or how much land supply will be available in non green belt locations at that point.	393
4. HO2 (B3) - Green belt release is contrary to NPPF	1. The proposal to build on the green belt contravenes the Government intention to protect the green belt. It is also contrary to the NPPF as this states that green belts should only be altered in exceptional circumstances	As the objector acknowledges the Government specifically allows for Local Authorities to make changes to release land from the green belt if there exceptional circumstances which there most certainly are.	440
4. HO2 (B3) - Green belt release is contrary to NPPF	2. Development should not be allowed on green belt whilst brown belt land remains.	The Council are required to release land to meet the objectively assessed needs of the district and to plan positively to meet that need and boost the supply of new homes. Government guidance does not permit the placing of a moratorium of the development of sites while brown field land remains.	28
5. HO2 (B3) - Green Belt – Objection to the Wording In Policy	1. Part (B.3) of Policy HO2 currently reads “Local Green Belt releases where consistent with the Plan’s sustainability principles, and where other sources of supply have provided	The Council disagrees. It is a fundamental principle of national planning policy that exceptional circumstances have to demonstrated in order to justify green belt releases and there is no way that this can be demonstrated if other deliverable	186, 415, 396, 397, 400, 402, 512

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HO2/B3	<p>insufficient within the relevant settlement or strategic planning sub area”.</p> <p>Several objections are made to the caveat relating to ‘other sources of supply have proved insufficient’.</p> <p>It is maintained that sites should be assessed on their own merits, and there may be cases where a site adjacent to the existing settlement limits in a sustainable location may provide the best way of achieving sustainable development, an approach supported by paragraph 52 of the NPPF This amounts to a sequential approach to site selection which is inconsistent with national policy.</p> <p>The latter part of this criteria is superfluous and the policy should be amended to read “Local Green Belt releases where consistent with the Plan’s sustainability principles.”</p>	<p>sources of supply to meet need have not been fully utilised.</p> <p>There is no conflict between the policy as worded and paragraph 52 of the NPPF. In planning to meet housing need the first stage as far as the approach to green belt is concerned is whether land supply assessments show that a green belt contribution is needed. Once the need for green belt is established and having established that there are opportunities for green belt release in sustainable locations (as demonstrated by the Bradford Growth Assessment) the next question is what approach to green belt land release would be the most sustainable and would be best suited to meeting need where it is most acute. All paragraph 52 is saying is that there may be occasions where large scale green belt releases in the form of urban extensions or village extensions may be the best option i.e. better than an approach which disperses green belt change to a larger number of smaller locations.</p>	
6. HO2 (B3) -The scope of green belt review	<p>1. Several objections to Policy HO2 concern the approach to green belt review – the scope of that review, how it will apply to the settlement hierarchy, locations for the review and the use of the term selective review as opposed to a full review of the green belt.</p>	<p>Policy HO2 is concerned with describing and established the main components of supply to meet the locational strategy and housing need. Policy HO2 therefore merely established the need for the release of green belt land. The approach to green belt and any review is covered within Policy SC7.</p>	186, 415,435, 444
7. HO2 (B3) - Green Belt - Miscellaneous	<p>1. Para 5.3.29 – we support the need for amendment to Green Belt boundaries in sustainable locations in settlements identified in the settlement hierarchy, especially in the LSC and particularly Haworth. However in assessing sites careful consideration as to weight to be given to various criteria and policies is paramount and should comply with NPPF para 14. Not consistent with</p>	<p>The objector fails to explain why policy HO2 is not consistent with paragraph 14 of the NPPF. Policy HO2 does not deal with the issues of site appraisal it merely established the need for a green belt contribution to meet housing need. Other policies which may be more relevant to the objector’s concerns include Policy P1 (Presumption In Favour of Sustainable Development), SC7 (Green Belt) and HO7 (Housing Site Allocation Principles).</p>	108

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	national policy.		
7. HO2 (B3) - Green Belt - Miscellaneous	2. Impossible to assess from the policies which areas of Greenfield and Greenbelt land in each sub-area will be affected by the policies. Without this connection it is difficult to assess the degree to which policies have been positively prepared in pursuit of sustainable development	<p>The Core Strategy does not allocate sites but has been informed by extensive evidence on the potential land supply. It is therefore possible to identify areas which may see land allocations but clearly the final selection of sites will only be confirmed once the Allocations DPD has been prepared.</p> <p>There is an implicit, simplistic and entirely erroneous assumption underlying this objection that all green field developments are unsustainable. The evidence already gathered including the Bradford Growth Assessment and the SHLAA indicate that there are many sites and locations that are either greenfield or within green belt that would offer sustainable options for development.</p>	394

POLICY HO3 – DISTRIBUTION OF THE HOUSING REQUIREMENT			
	Support for Policy HO3		
HO3	1. The Highways Agency notes the proposals for development within Bradford SE, SW and the City Centre and has identified a number of areas where new schemes will be required to absorb the additional traffic which will utilise the motorway network. The Agency is committed to working with the Council in delivering the schemes necessary to support this level of development.	The comments are noted and welcomed.	161
HO3	2. Support the broad principle in Policy HO3 of the revised spatial strategy, relocating new domestic development in zones away from the SPA, which will minimise impacts on the SPA	Support noted and welcomed.	34
HO3	3. The proposals are acceptable to Kirklees subject to continuing discussions on the impact of the Holme Wood urban extension with a view to reaching agreement on the need for and nature of	The support for Policy HO3 is noted and welcomed. The Council agrees that further discussions and co-operation in addition to that which has already taken place will be needed in planning for the infrastructure needed to support the Holme	53

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	additional infrastructure provision in the locality.	Wood urban extension.	
HO3	4. North Yorkshire County Council supports the distribution of housing development in Policy HO3, with the Regional City of Bradford meeting the greatest proportion of development. This approach minimises potential cross-boundary issues for the County Council in its role as upper tier authority and infrastructure provider in Craven and Harrogate Districts.	Support noted and welcomed.	190
HO3	5. We support the intention that, as far as is possible and practicable, a general principle that the distribution of development will assist the retention and conservations of the District's environmental assets. This will assist in the delivery of the Vision that the District's unique landscapes and heritage will have played a vital role in making places that encapsulate what makes Bradford so special.	Support noted and welcomed.	103
HO3	6. The policy sets out a clear distribution of the housing requirement. This is supported. We support the general spread of growth which ensures that all areas of the district and the majority of sustainable settlements will benefit from some housing growth catering for need where it arises and providing a range and choice of locations to build new houses. This is good planning practice. In particular we wholly support growth being directed to Local Growth Centres and the proportion of growth subject to our comments in relation to Policy HO1.	Support noted	129
HO3	7. We note that the background paper on housing (part 1 – housing requirement, supply and distribution) acknowledges the need for and requirements of the sequential test. Some growth is planned for areas within flood zones 2 and 3 (i.e. within the City Centre and Canal Road Corridor AAPs), but the background paper provides an	The comments are noted.	493

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	explanation as to why these areas are sequentially preferable.		
HO3	8. Appendix 4 of the housing background paper demonstrates that a significant proportion of growth will be in the lowest flood risk area. The desired outcome of a sequential approach to the location of development has been achieved and we fully support this, however, we consider that preparation of a sequential test paper, which pulls together all the information in one document, will provide much more transparency to demonstrate how the sequential test is being applied and recommend that the council pursues this	The comments are noted.	493
Comments and Objections to the General Distribution Principles			
1. HO3 - Unclear How the Targets Have Been Calculated	1. Unclear how the housing apportionment has been calculated.	The approach to determining the housing targets and the evidence on which it was based is clearly set out within the Core Strategy (paragraphs 5.3.39 to 5.3.64) and the Housing Background Paper.	74, 179, 311, 322, 368, 372, 378, 427
2. HO3 - The Habitats Regulations Assessment	2. Natural England previously advised that due to evidence of feeding distances of Pennine moorland SPA birds beyond the site boundary (2.5km for Golden Plover), the HRA should include evidence that the housing targets for settlements within this distance can be delivered within the subsequent allocations development plan. If sufficient sites, without feeding habitat or evidence of SPA birds are not available, the Core Strategy's housing distribution may not be deliverable.	This advice led directly to the commissioning of bird and habitat survey work during the Spring and Summer of 2013 to ascertain where bird instances and feeding / supporting habitats were located and thus allowing a comparison of these locations with the potential land supply (SHLAA sites) within the 2.5km zone. The HRA Report has been reviewed and it is considered that evidence has been provided to indicate that sufficient sites, without feeding habitat or evidence of SPA birds, could be delivered to fulfil the housing targets identified in the publication draft core strategy.	513
2. HO3 - The Habitats Regulations Assessment	3. Natural England considers the evidence supporting the assessment of the Core Strategy's likely impacts upon the moorland SPAs and SACs is comprehensive.	The comments are noted and welcomed.	513

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<p>2. HO3 - The Habitats Regulations Assessment</p>	<p>4. The publication draft has reduced the number of dwellings within Airedale and Wharfedale, this has been justified in terms of impacts on the SPA/SAC.</p> <p>The HRA however has not justified the redistribution of housing from settlements within Wharfedale and Airedale to Bradford. Policy HO3 may therefore be challenged as unsound.</p>	<p>It should be noted that the position of Natural England has evolved since the submission of this representation. The issues contained in Natural England’s representation of March 2014, have been superseded by their acceptance in August 2014 that potential impacts on the breeding bird assemblage needed to be taken into account and their acceptance in December 2014 that satisfactory evidence had been provided in the revised HRA to support the position taken in the publication draft Core Strategy on Policy HO3.</p> <p>The Council has worked closely with Natural England to clarify their concerns and improve and update the HRA. The updated HRA Report provides greater clarity about how measures have been identified which sought to avoid effects in response to evidence gathered and impact pathways identified.</p> <p>In summary Natural England previously advised that due to evidence of feeding distances of Pennine moorland SPA birds beyond the site boundary (2.5 km for Golden Plover), the HRA should include evidence that the housing targets for settlements within this distance can be delivered within the subsequent allocations development plan. If sufficient sites, without feeding habitat or evidence of SPA birds were not available, the Core Strategy’s housing distribution may not be deliverable. This advice led directly to the commissioning of bird and habitat survey work during the Spring and Summer of 2013 to ascertain where bird instances and feeding / supporting habitats were located and thus allowing a comparison of these locations with the potential land supply (SHLAA sites) within the 2.5km zone.</p> <p>Natural England in their letter of August 2014 confirmed that the focus of the analysis should be on whether housing targets in Policy HO3 would result, at the allocations stage, in the loss of functionally linked land used by the breeding bird</p>	<p>513</p>
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		<p>assemblage (either through direct loss of habitat or indirect disturbance). The species found to coincide with SHLAA trajectory sites in the subsequent survey work, Curlew and Lapwing, are part of that assemblage.</p> <p>As a result of the work carried out and commissioned by the Council and the revised and improved HRA report, Natural England have stated in their letter of December 2014 that,</p> <p>“Natural England’s letter dated 1 August 2014 advised that the HRA should examine whether housing targets in Policy HO3 would result, at the allocations stage, in the loss of functionally linked land used by the breeding bird assemblage (either through direct loss of habitat or indirect disturbance). This assemblage includes curlew and lapwing, the HRA outlines both species have been recorded widely within 2.5km of the SPA (as was favourable feeding habitat). Our representation on the publication draft Core Strategy (dated 31 March 2014) highlighted that significant loss of curlew feeding habitat may occur as a result of the policy HO3 and the revised HRA has concluded that adverse effects of policy HO3 cannot be ruled out. Given the strategic nature of the Plan and considering the evidence presented to date Natural England concurs with this conclusion and therefore the requirement for avoidance and/or mitigation measures within the Core Strategy and subsequent development plan documents.”</p>	
2. HO3 - The Habitats Regulations Assessment	5. Table 5.3 and Appendix III provide confidence that potential housing sites (identified in the SHLAA) can be allocated without the direct loss or disturbance to SPA birds. Given this conclusion, the redistribution of housing to avoid adverse effects on the SPA and SAC, does not appear justified.	Natural England’s position has now changed. See above.	513
2. HO3 - The Habitats	6. Prior to publication Natural England advised that further bird and habitat surveys would indicate	These comments have now been superseded by Natural England’s December 2014 response to the revised HRA.	513

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<p>Regulations Assessment</p>	<p>whether sufficient sites within 2.5km of the Natura 2000 site could be allocated. We welcome the inclusion of the 2013 bird and habitat surveys. Table 5.3 and Appendix III provide confidence that potential housing sites (identified in the SHLAA) can be allocated without the direct loss or disturbance to SPA birds.</p>		
<p>2. HO3 - The Habitats Regulations Assessment</p>	<p>7. In assessing constraints, the Growth Study also examines the impact of Special Protection Areas ('SPA') and Special Areas of Conservation ('SAC') in relation to settlements in the District. The approach taken and outlined in the Council's Habitats Regulation Assessment is to utilise a 2.5km buffer zone around the SAC/SPA boundary and for this to feed into and inform Policy HO3 and is also outlined in Policy SC8. This has then led to a reduction in housing to key settlements such as Ilkley and Menston and constraining development in areas such as north Keighley.</p> <p>Whilst our Client agrees that there is a requirement to ensure key areas of wildlife are given the necessary protection, we believe methodology which relates to the 2.5km buffer zone is fundamentally flawed in its approach.</p> <p>The Council also need to ensure a better balance is struck between meeting the identified future needs for housing in Wharfedale and Airedale and adequately protecting the SPAs and SACs that fall within the District boundaries. As it currently stands this balance is not achieved and the imposition of such a wider buffer zone is both scientifically and legally flawed making both Policy HO3 and Policy</p>	<p>The role of the Growth Study did not drive or determine the approach to the South Pennines SPA. The Growth Study merely mapped the constraint layers relating to the SPA – it did not devise or advise on the approach to mitigate or avoid impacts on the SPA, that was the role of the HRA. Nor did the Growth Study specifically rule out or screen out areas adjoining settlements but within the 2.5km buffer zone.</p> <p>The Council's approach to the SPA was based on the specific advice from both Natural England and the consultants Urban Edge who prepared the HRA report. The Council considers that the approach undertaken and the resultant reduction in the housing targets of some settlements is reasonable, balanced and justified.</p> <p>It should be noted that while the use of a 2.5km buffer zone does affect the housing distribution and targets but it does not automatically rule out specific sites from coming forward within that zone.</p> <p>It is also noted that the objector fails to provide an indication of what they consider to be a 'better balance', what methodology and approach to the SPA they would advocate.</p>	<p>423</p>

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	SC8 unsound. To remedy this the Council need to re-examine the evidence which underpins these policies and seek the amend their approach as outlined in Appendix A of this document.		
2. HO3 - The Habitats Regulations Assessment	8. As already stated in relation to policy SC8 and the sub area policies we have carefully reviewed the Habitats Assessment and we have criticised the way in which this has been used as a primary evidence base for reducing the amount of housing particularly in the Wharfedale settlements. Our general planning knowledge and evidence combined with specific site and location assessments together with the specialist ecological critique provided on behalf of some our clients by Baker Consultants clearly demonstrates that the Habitats Assessment 2014 does not constitute a reliable and justified evidence source for use in reducing contributions from certain settlements in the hierarchy and re-distributing this to other sub areas in some cases distant from where that proportion of need arises.	In relation to the use of the HRA work, the Council disagrees. The Appropriate Assessment of May 2013, which related to the Core Strategy Further Engagement Draft document exercised an influence over the core strategy at a stage when evidence was being gathered and options were being assessed. In accordance with the HRA hierarchy of intervention, this allowed measures to be identified which sought to avoid adverse effects. The updated HRA Report provides greater clarity about the influence of impact pathways. The nature of the work undertaken as part of the HRA is covered within the updated Council's Background Paper 1 issued at submission. The land supply analysis which assessed where SHLAA sites co-incident with survey recordings of birds and habitats is also described in the background paper. This work together with a range of other factors, in the Council's view clearly justify the revisions made to the housing distribution.	447
2. HO3 - The Habitats Regulations Assessment	9. It appears that the primary evidence for making the reductions to development in Wharfedale is based upon the impact of Special Protection Areas ('SPA') and Special Areas of Conservation ('SAC') in relation to settlements in the District. The approach taken and outlined in the Council's Habitats Regulation Assessment is to create a 2.5km buffer zone around the SCA / SPA boundary, which in turn has informed Policy HO3. This approach has led to the direct result of reducing development within Wharfedale and particularly Addingham.	The Appropriate Assessment of May 2013, which related to the Core Strategy Further Engagement Draft document exercised an influence over the Core Strategy at a stage when evidence was being gathered and options were being assessed. In accordance with the HRA hierarchy of intervention, this allowed measures to be identified which sought to avoid effects. The overall objective of appropriate assessment is to ascertain whether any part of the plan will lead to an adverse effect on the ecological integrity of nearby European sites and, if so, make recommendations based on evidence as to how such effects can be avoided or mitigated. The approach taken	447

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	<p>A 2.5km buffer zone is considered overly cautious and in employing such a wide buffer has the effect of unnecessarily constraining growth within certain areas of Wharfedale and Airedale where there is a clear identified need for housing.</p>	<p>to ensure that there is no absolute need to rely on land and sites within the zone which could be important in supporting the relevant bird species is in line with HRA hierarchy of intervention . It is an appropriate response in a strategic level document such as the Core Strategy. It will allow development to take place but provide confidence that adverse impacts on the ecological integrity of the South Pennine Moors can be avoided.</p> <p>The Council does not therefore consider that the approach taken is overly cautious. The 2.5km zone is an essential element in establishing a spatial approach to avoiding and mitigating impacts. It is needed to safeguard supporting habitats as loss of feeding areas could have an important impact on populations for which the SPA has been classified. The HRA emphasises that within the 2.5km zone, sites identified for development need to avoid impacts on important supporting habitats. The reason the zone applies to significant areas of Airedale and Wharfedale is due to the location of Rombalds Moor which forms an ‘island ‘area of upland heath.</p> <p>While the results of that additional HRA related work were the main reason for a reduction in the housing growth in Wharfedale, other factors were also relevant and these included the reduction in the total district wide housing target compared to the CSFED and the updated SHLAA which revealed increased land supply district wide and in particular greater capacity within the Regional City of Bradford which is rightly placed as the main focus for new housing growth.</p> <p>Further details are provided within the Council’s updated Background Paper 1 issued at submission.</p> <p>Despite the reductions, the Core Strategy is still planning for a significant quantum in Wharfedale at a level well in excess of</p>	
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		development which has been proposed in previous plans. The Council therefore considers that this is a balanced, justified and sound approach.	
2. HO3 - The Habitats Regulations Assessment	<p>10. The Sustainability Appraisal of the core strategy spatial distribution should consider the bird and habitat surveys undertaken to support the HRA.</p> <p>Whilst it would appear that the Core Strategy is unlikely to result in the significant loss of feeding habitat for SPA birds, this is not the case for SSSI interest features, notably Curlew, which were recorded widely across the survey area. This distribution reflects their preference for breeding sites within semi improved areas adjacent the moors.</p> <p>Paragraph 2.5.1 summarises the effects of development distribution. It refers to the proximity of Principle Towns to the South Pennine Moors SPA, SAC and SSSI as a significant consideration. Whilst the HRA addresses impacts on the SPA/SAC, the SA should determine whether harm to the SSSI is significant.</p>	<p>It needs to be noted that, whilst responses have been made to original issues raised by Natural England in rep 513, dated March 2014, these issues were raised prior to their subsequent acceptance in August 2014 that potential impacts on the breeding bird assemblage needed to be taken into account and prior to their acceptance in December 2014 that satisfactory evidence had been provided in the HRA to support the position taken in the publication draft core strategy.</p> <p>Advice from Natural England of December 2014 states: <i>Natural England's letter dated 1 August 2014 advised that the HRA should examine whether housing targets in Policy HO3 would result, at the allocations stage, in the loss of functionally linked land used by the breeding bird assemblage (either through direct loss of habitat or indirect disturbance).</i></p> <p><i>This assemblage includes curlew and lapwing, the HRA outlines both species have been recorded widely within 2.5km of the SPA (as was favourable feeding habitat). Our representation on the publication draft Core Strategy (dated 31 March 2014) highlighted that significant loss of curlew feeding habitat may occur as a result of the policy HO3 and the revised HRA has concluded that adverse effects of policy HO3 cannot be ruled out. Given the strategic nature of the Plan and considering the evidence presented to date Natural England concurs with this conclusion and therefore the requirement for avoidance and/or mitigation measures within the Core Strategy and subsequent development plan documents.</i></p> <p>On the specific SA point - the Council agrees with the principle</p>	513

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	In accordance with paragraph 118 of the NPPF, any significant harm should then be weighed against the benefits of housing in these strategic locations.	<p>that the SA process should address potential impacts of proposals on SSSIs within the district. At a strategic level, this has taken place in relation to the iterations of the SA linked to the development of the core strategy. While the evidence base work from the HRA, which was a more detailed assessment, including the bird and habitat surveys, will be used to inform future SA work relating to individual site assessments linked to the Allocations DPD. The bird and habitat survey work presented in the HRA relates to birds of importance in the SPA/SAC context.</p> <p>The Council disagrees with Natural England’s original but now superseded statement that the CSFED spatial distribution is unlikely to result in significant loss of feeding habitat for SPA birds. The analysis earlier in this table indicates that a reduction in the housing targets in some settlements was entirely justified.</p> <p>It is noted that NPPF paragraph 118 specifically relates to the determination of planning applications and its application and direct relevance in this context is questioned. The Council considers that the overall approach to the HRA is fully in compliance with the NPPF. A more detailed response to this issue has been provided in relation to the section of the table which deals with Policy SC8.</p>	
3. HO3 - Viability	A number of representations argue that the proposed distribution does not take sufficient account of viability considerations:		
3. HO3 - Viability	1. Paragraphs 5.3.42-45 set out a number of general principles which underpin the housing distribution. All four principles have merit but conspicuous by its absence is any consideration of viability and scheme economics as outlined in para 173 of the Framework.	This is incorrect. Viability and deliverability are already built into the process via the evidence base as envisaged by the NPPF. The plan has been informed by 2 SHLAA’s both of which assessed the deliverability of sites and included house builder input and also by the Affordable Housing Economic Viability Assessment (AHEVA) and the Local Plan Viability	105, 494, 512

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		Assessment.	
3. HO3 - Viability	2. The Bingley Rural Ward Members consider that the Proposals for housing fail to account for the lack of viability in Bradford and specifically within the Parish of Denholme (there are four significant brownfield sites that have permission but are not developed – we understand that viability is the barrier)	Viability in parts of the urban areas is challenging under the current economic conditions, and in this sense Bradford is in no different position to many other northern towns and cities. However the Local Plan Viability Assessment underlines the need to consider viability over the full economic cycle and over the whole of the plan period to 2030. It is also unclear what the objector is suggesting as an alternative distribution approach.	494
3. HO3 - Viability	3. To ensure that Policy HO3 is sound, it is imperative that the Council revisit its methodology to better take into account the viability of development within certain areas of the District. If it is the case that the Council continue with the current distribution it is vital that flexibility is built into the plan to ensure other areas can accommodate any under-delivery from the more viability compromised areas.	It is unclear what policy change is being suggested.	423
3. HO3 - Viability	4. The HBF questions whether given the viability issues apparent within the 'Local Plan Core Strategy - Viability Assessment, Sept 13' the Council will be able to achieve the amount of development required. This is particularly apparent within the inner areas of Bradford and Keighley which the Council anticipate will take substantial growth.	It is incorrect to characterise the approach as focusing on the inner areas of Bradford and Keighley. In Bradford only 3,500 new homes are proposed in the City Centre which is undergoing major regeneration while there are relatively few sites in the inner areas surrounding it. In the Regional City as whole it is currently estimated that around 7,000 of the 28,000 new homes may need to be built on green belt in sustainable locations around the edge of the settlement. City wide it is estimated and proposed that only 55% of new homes will be provided on previously developed sites, the remainder on green field land.	105
3. HO3 - Viability	5. It appears that in coming to their proposed distribution of dwellings across the District, the Council has placed a strong emphasis on the Growth Study that has been produced to examine areas in and around settlements that are	The Council disagrees with this comment. The growth study had a narrow remit which was specifically geared to assessing the scope for and potential sustainability of urban extensions and local green belt releases across the district. It made a useful contribution to the final proposed distribution but was	423, 437

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	<p>subject to constraints. This however appears to largely ignore important factors such as viability considerations, deliverability of available sites and most importantly the growth needs to maintain viability of a settlement and also to meet the needs of population changes in those settlements.</p> <p>Our Client considers that without proper thought to viability it will be difficult for the Council to undertake their desired distribution of housing given many lower value areas of the District and certain previously developed sites will not be able to be delivered in the current market. This in turn this will unduly affect the Council’s ability to achieve its overall housing target. As a result of this it is our Client’s view that on this basis the policy will be ineffective.</p>	<p>only one of many elements of evidence which were used to determine the most appropriate targets. Viability was taken into account both by reference to the SHLAA which assessed each site’s deliverability and in relation to the viability work within the AHEVA and Local Plan Viability Assessment. The Council accepts that development can have a role in supporting and maintaining services and therefore the viability of settlements. In this respect it should be noted that even the smallest settlements and all of the settlements in the lowest tier of the settlement hierarchy have been assigned some development.</p> <p>Persimmon Homes has been a member of the SHLAA Working group for both SHLAA studies and endorsed its methodology. It should therefore appreciate that the SHLAA has assessed deliverability and developability of a site by site basis.</p> <p>Moreover the objectors make vague reference to sites which are claimed to be undeliverable but neither states which sites these are or why these conclusions have been reached. The only assumption that can be reached is that the objector either has some analysis or evidence on which this position has been reached but is withholding it or is making the assumption without proper analysis and information to back it up. If it is the former then this is an unhelpful approach which mirrors the unhelpful approach taken by Persimmon Homers at the conclusion of the SHLAA Update process.</p>	
4. HO3 - Flexibility	1. Using prescriptive numbers without any flexibility effectively predetermines the allocation process;	The Council disagrees. The use of numbers within Policy HO3 gives a clear indication of the quantum of development proposed and allows the strategic implications of those quantum to be assessed. It is the Allocations DPD which determines which sites are allocated to meet those quantum.	512
4. HO3 - Flexibility	2. Policy HO3 should be simplified to simply demonstrate the distribution of housing across the	The Council strongly disagrees. The proposal would not provide the clarity required to allow both the implications of the	512

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	hierarchy and settlements, represented as percentage points rather than as numbers to allow some flexibility.	distribution approach in the Core Strategy to be assessed nor would it provide clear guidance to the Allocation DPD. It would also unnecessarily lengthen the process for preparing the Allocations DPD since major strategic issues of distribution would have to be resolved during that process. It would delay and undermine the early delivery of much needed new homes.	
4. HO3 - Flexibility	3. If the Council intend to continue with such an approach it is imperative that flexibility is built into the plan to ensure other areas can accommodate any under-delivery from the more viability compromised areas.	It is unclear as to what change the objector is recommending.	105
4. HO3 - Flexibility	4. In addition it is strongly recommended that sites within the low value areas are not subject to the full policy burdens of the plan.	It is disappointing that the HBF view policies designed to achieve good quality housing and the necessary supporting infrastructure as 'burdens'. The Council points out that in most cases policies which would require developer contributions such as affordable housing are prefaced by the phrases such as 'subject to viability'.	105
5. HO3 - Infrastructure	1. Bingley Rural Ward Members state that the Core Strategy anticipates improvements in public transport serving the South Pennine Villages but, other than this aspiration, gives no indication as to how these improvements are to be delivered. Proposals for housing do not meet this aspiration since the private car will be the predominant choice of transport	The Council accepts that in some rural areas where public transport is limited residents will use private car as their preferred means of travel. The Council has confidence that future capacity issues for both road and rail, arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures. Further work will be undertaken as part of the more detailed site allocations work to determine more local improvements and mitigation.	494
5. HO3 - Infrastructure	2. The plan does not require completed highways improvements in the Aire Valley ahead of development in Cottingley – the recent Saltaire improvements show that the highway lacks capacity.	The Council has confidence that future capacity issues for both road and rail, arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures. Further work will be undertaken as part of the more detailed	494

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		site allocations work to determine more local improvements and mitigation.	
5. HO3 - Infrastructure	3. We do not agree with the conclusion that transport should not be a main factor used to determine the distribution of housing growth. We would argue that transport is a main factor to be taken into account especially where existing and planned transport infrastructure provides a travel option which is already demonstrably successful such as the Airedale and Wharfedale electrified rail services connecting local communities and local communities with the core city centres of Bradford and Leeds.	The objector may be misinterpreting what the Core Strategy meant at paragraph 5.3.46. The Core Strategy is referencing the traffic modelling done in the Transport Study and stating that this work which assessed the varying strategic options (set out in the Further Issues and Options Stage - at a more strategic and aggregated level than individual settlement targets) did not indicate that any particular option would be significantly preferable. It is a different point, and one which the Council accepts, that public transport infrastructure and potential improvements can in some instances be relevant to the chosen settlement level housing targets.	447
5. HO3 - Infrastructure	4. The PDCS justification at paragraphs 5.2.46 and 5.2.47 defers strategic decisions on transport projects and states that further work is required. Strategic spatial planning and distribution of housing and employment growth must go hand in hand with the identification of priority transport projects and the realistic means for securing the delivery of this essential infrastructure. It is clear that further work is required to arrive at a more balanced, informed and justified approach to housing distribution and its key relationship with transport infrastructure both existing and planned. Section 4 of the NPPF at paragraphs 30, 31, 32, 34, 35 and 37 sets a clear policy framework for a linked approach to land use and transportation planning.	The Council disagrees. A clear distinction needs to be made between what is necessary to support a strategic plan and more detailed work which needs to be done to support area based an site allocations plans. Paragraphs 5.3.46 and 5.3.47 are making the specific point that further corridor based transport assessments will need to be produced as part of the Allocations DPD to identify measures which help manage and mitigate the effects of development and growth. However this can only be done once both the strategic distribution and site selection stages are clarified. It is also surprising that the objectors on the one hand consider that it is the Council's proposed distribution of housing cannot be justified without further very detailed transport infrastructure planning and yet they feel able to set out an alternative distribution without the benefit of such claimed essential work.	447
6. HO3 - Matching targets to SHLAA /	1. The proposed targets do not seem feasible as they do not match potential supply in the SHLAA	The Council disagrees. The proposed targets do reflect the SHLAA data in most cases.	439

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<p>Land Supply</p>	<p>The publication draft proposed 3,500 dwellings for the City Centre whereas the SHLAA only provides for 2,752 dwellings</p>	<p>In all but 4 instances (out of a total of 27 settlement areas) total SHLAA site capacities lie above and in many cases well above proposed Core Strategy housing targets. In two out of those 4 exceptions – Oxenhope and Harden the SHLAA Update capacity lies just a few units under the proposed total meaning that a couple of infill or redevelopment sites could make up the difference. In the case of Cullingworth planning permission has now been granted for a large housing development at Manywells. This occurred too late to be included within the SHLAA update but takes total capacity well above the proposed Core Strategy target.</p> <p>This just leaves Bradford City Centre. In the case of Bradford City Centre the Council made its decision on evidence of additional potential capacity not currently captured by the SHLAA update. This included additional capacity from higher yields on some of the SHLAA sites already in the trajectory and also a number of sites with potential which were for a number of reasons not captured within the SHLAA 2 trajectory. Provisional data from the third SHLAA is showing a much increased capacity within this area to a level well above the proposed target for the City Centre in the Core Strategy Publication Draft.</p> <p>It should also be pointed out that some limited further capacity is expected to be added to the future iterations of the SHLAA from a number of sources such as neighbourhood planning work, recycled sites and most notably through the addition of further land from a comprehensive green belt review informed by the Bradford Growth Study (which shows potential in a number of areas not currently picked up by the SHLAA which as far as green belt is concerned at present mainly reflects merely those sites put forward speculatively by landowners and developers.)</p>	
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<p>6. HO3 - Matching targets to SHLAA / Land Supply</p>	<p>2. Canal Road shows a shortfall of 605 dwellings</p> <p>Bradford SE shortfall of 682 dwellings</p> <p>Bradford NE shortfall of 104 dwellings</p> <p>Cullingworth shortfall of 109</p> <p>Harden shortfall of 14</p> <p>Oxenhope a shortfall of 49</p>	<p>This is incorrect. The SHLAA Update indicates a potential capacity of 3600 which lies well above the proposed CSPD target of 3200. The confusion possible arises because of an amendment to the Canal Rd corridor boundary after the first SHLAA which incorporated a slightly wider area taking in some sites which were previously in adjoining areas (mainly Shipley). To allow comparison the main tables in the SHLAA Update report presented data using the older area boundary with an appendix showing the revised boundary area which is the area defined within the Core Strategy. This is all explained in paragraph 6.3 of the SHLAA Update Report. The total SHLAA capacity for the revised larger area is 3600 units.</p> <p>This is incorrect – SHLAA Update capacity totals 6607 which is in fact a surplus of over 600 dwellings</p> <p>This is incorrect – SHLAA Update capacity totals 5170 which lies well above the CSPD target of 4500 dwellings</p> <p>This is incorrect – SHLAA Update capacity does not include the full capacity of the Mannywells quarry site (233 dwellings) which came forward after the cut off for the second SHLAA. Total revised capacity including Mannywells is now estimated to be approximately 464 – well above the CSPD target of 350 dwellings.</p> <p>The deficit is v small and could be removed by the identification of just 1 further site. The deficit is therefore not material.</p> <p>Again not material.</p>	<p>439 & 423</p>
<p>6. HO3 - Matching targets to SHLAA / Land Supply</p>	<p>3. We disagree with the conclusion at paragraph 5.2.50 that the current SHLAA provides the most critical element of the reality checking process for</p>	<p>This is a difficult point to understand. It is surely essential that whatever housing target is proposed is shown to be achievable based on evidence of the potential deliverable and</p>	<p>447</p>

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	the redistribution of the requirement figure.	developable land supply most notably within the SHLAA or any other relevant information. The SHLAA is therefore an essential piece of evidence in the reality checking process.	
7. HO3 - The District Wide Housing Requirement	1. The policy HO3 distribution of the housing requirement is not currently sound. Our initial reason is that this does not meet the revised global requirement which we, NLP and others are advocating in our submissions based on an evidence base which has stronger justification than that utilised by the Council.	The Council does not agree with this point. Clearly the HO3 distribution should meet the overall residual housing requirement set out in Policy HO1. However the Council considers that Policy HO1 is a sound and robust objective assessment of housing need.	447
8. HO3 - The Bradford Growth Assessment	1. We agree that the Growth Study provides a strategic level assessment which is very helpful evidence for the formulation of CS distribution policies.	The comment is noted	447
9. HO3 - Affordable Housing	1. We disagree with the conclusions in paragraph 5.2.58 with regard to the argument that supply could be increased in Wharfedale to achieve more affordable housing but such an approach is not justified because of the weighting of the quantum of affordable need towards the main urban area of Bradford. Increasing the supply in Wharfedale would bring these benefits and there is no justification to penalise local affordable needs.	This is missing or perhaps deliberately ignoring the point made. The point is that the SHMA indicated relatively low levels of annual affordable housing need in Wharfedale and very substantially higher levels of annual affordable housing need in Bradford. In the Wharfedale sub area as defined in the SHMA, (which includes the settlements of Menston, Burley, Ilkley, Addingham, Silsden and Steeton) the Council are proposing a total of 3300 homes and a affordable housing percentage of 30%. Without taking account of affordable housing delivered by non S106 routes – HCA etc – this quantum could deliver up to 990 new homes. Local needs in Wharfedale are therefore not being penalised. On the contrary, increasing the housing targets in Wharfedale, if done at the expense of lower targets in Bradford would be penalising people in affordable housing need in Bradford.	447
10. HO3 - Inconsistent Approach	1. The Council have sought to justify their changed distribution by a variety of individual factors applying to individual settlements that does not constitute a	This is incorrect. The approach is consistent. The same factors have been assessed in all cases – its just that certain factors are either not relevant or not critical in some	447

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	consistent overall approach.	settlements but are relevant in others.																																									
11. HO3 - Alternative Distribution	<p>1. We have produced a revised distribution table which applies the additional overall requirement we estimate of 4,900 dwellings within the plan period but restricts this distribution to the Principal Towns, the Local Growth Centres and the local service centres. The level of growth in the Regional City has not been adjusted from the figures contained in policy HO3 as, for the reasons summarised below, we consider these already substantial figures to be challenging. The Regional City would on this basis take 61% of the growth and not 68%</p> <table border="1"> <tr><td>Keighley</td><td>5100</td></tr> <tr><td>Bingley</td><td>1600</td></tr> <tr><td>Ilkley</td><td>1750</td></tr> <tr><td>Silsden</td><td>1750</td></tr> <tr><td>Steeton with Eastburn</td><td>1500</td></tr> <tr><td>Queensbury</td><td>700</td></tr> <tr><td>Thornton</td><td>1500</td></tr> <tr><td>Addingham</td><td>500</td></tr> <tr><td>Baildon</td><td>550</td></tr> <tr><td>Burley in Wharfedale</td><td>500</td></tr> <tr><td>Cottingley</td><td>275</td></tr> <tr><td>Cullingworth</td><td>500</td></tr> <tr><td>Denholme</td><td>500</td></tr> <tr><td>East Morton</td><td>150</td></tr> <tr><td>Harden</td><td>150</td></tr> <tr><td>Haworth</td><td>600</td></tr> <tr><td>Menston</td><td>900</td></tr> <tr><td>Oakworth</td><td>250</td></tr> <tr><td>Oxenhope</td><td>150</td></tr> <tr><td>Wilsden</td><td>500</td></tr> </table>	Keighley	5100	Bingley	1600	Ilkley	1750	Silsden	1750	Steeton with Eastburn	1500	Queensbury	700	Thornton	1500	Addingham	500	Baildon	550	Burley in Wharfedale	500	Cottingley	275	Cullingworth	500	Denholme	500	East Morton	150	Harden	150	Haworth	600	Menston	900	Oakworth	250	Oxenhope	150	Wilsden	500	<p>The Council considers that the alternative distribution is flawed. Among the many issues it applies a housing requirement which lies well above the objectively assessed needs of the district. It fails in some cases to reflect the limitations of the available land supply as set out in the SHLAA. Furthermore the proposed increases would substantially and unjustifiably increase the amount of land which would need to be released from the green belt.</p> <p>By allocating this additional housing in the main to the smaller and more peripheral settlements in the district, the proposed focus on the main urban area of Bradford where housing need is most acute would be somewhat diluted.</p> <p>The proposal would increase the impacts on the S Pennines SPA contrary to the analysis and recommendations of the HRA. It would further increase the likelihood of impacts on key heritage assets in Baildon and Haworth contrary to the advice of English Heritage.</p>	<p>447 396, 397, 400, 402,</p>
Keighley	5100																																										
Bingley	1600																																										
Ilkley	1750																																										
Silsden	1750																																										
Steeton with Eastburn	1500																																										
Queensbury	700																																										
Thornton	1500																																										
Addingham	500																																										
Baildon	550																																										
Burley in Wharfedale	500																																										
Cottingley	275																																										
Cullingworth	500																																										
Denholme	500																																										
East Morton	150																																										
Harden	150																																										
Haworth	600																																										
Menston	900																																										
Oakworth	250																																										
Oxenhope	150																																										
Wilsden	500																																										

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	Support for the analysis carried out by Johnson Brook and the alternative housing distribution as follows is proposed:		
11. HO3 - Alternative Distribution	<p>2. We do not seek to reduce the general primacy and significance of the Regional City’s contribution.</p> <p>In our evidence we have argued that the housing requirement figures for the Regional City of Bradford should be maintained at the level proposed in the Publication Draft Core Strategy. This results in a residual housing requirement of 18,350 to be distributed across the Principal Towns, Local Growth Centres and Local Service Centres (47,000 – 28,650 = 18,350). Of this residual housing requirement figure approximately 50% (8,550) is distributed to the three Principle Towns; the remaining circa 50% requirement has been split between the Local Growth Centres and Local Service Centres (5,250 and 4,625 respectively).</p>	It is noted that the objector concurs with the housing targets assigned to the Regional City. However the premise behind the increases elsewhere are flawed as there is no justification, in the Councils view, for increasing the total district wide housing requirement.	447
12. HO3 - Population Growth & Need Focused on Bradford Not Elsewhere	<p>1. The Housing Requirement Study anticipates an increase in population to 595,799 by 2028 driven mainly by natural growth (Core Strategy 2.32). Much of this natural increase will be within the ‘City of Bradford including Shipley & Lower Baildon’ rather than within the other areas identified within the plan.</p> <p>Given this skewed distribution you would expect the Core Strategy to allocate housing in a similar manner. However the Core Strategy does not do this (Core Strategy 5.2.48):</p> <p><i>“The District wide housing requirement of 42,100 was then assigned according to the proportion of</i></p>	<p>The Council does not agree with these comments which appear not to be based on neither an accurate depiction of the Core Strategy’s approach to distribution or of the conclusions of the Housing Requirement Study.</p> <p>Nowhere in the Housing Requirement Study is there any indication that there will not be household growth and thus a need for additional housing across the district outside of the Regional City. It is not just the City of Bradford where housing is needed and it is a shame that the objector is not advocating the provision of housing to provide for the needs, particularly affordable, in all these areas.</p> <p>Secondly the housing distribution proposed within Policy HO3 is already heavily concentrated on the Regional City of</p>	157

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	<p><i>the population within each settlement.”</i></p> <p>Some adjustment is made to this distribution but too great an emphasis is given to housing development in areas of the District where rapid population growth is not anticipated (in particular the places designated as Local Growth Areas – Queensbury, Thornton, Silsden and Steeton-with-Eastburn).</p> <p>.</p>	<p>Bradford (68% of the district wide total is allocated here). Given the problems of securing developable land within a heavily built up urban area and given the challenges of delivery which the objector recognises, it is suggested that the target is challenging but entirely appropriate.</p> <p>As the objector will know, Local plans have to have regard to a range of sometimes conflicting criteria in determining their approach to meeting housing need – for example land supply, economic viability, flood risk, and requirements to maintain sufficient urban green spaces are all factors which have to be taken into account.</p>	
13. HO3 - Development In Airedale and Wharfedale Meeting Adjoining LA Needs Not Bradford's'	<p>1. The risk with the proposed approach is that development in Airedale and Wharfedale will not meet housing needs within the District but rather housing demand from the City of Leeds, North Yorkshire and Calderdale especially given current transport and travel-to-work patterns.</p>	<p>The Council disagrees with this assertion. Evidence from the SHMA suggests that even in Wharfedale the majority of new homes provided will be taken up by residents from within the district. Clearly the location of Wharfedale at the northern end of the district means that some new homes will be purchased by residents from adjoining authorities just as new homes being planned in those authorities will be providing in part for households on the Bradford side of the border.</p>	157
14. HO3 - The Baseline Distribution	<p>1. Within the CSDPD the Council have observed the requirement within each settlement based on expected population changes over the plan period, using 2011-based census and GIS software. The Council have then adjusted these figures to take into account various factors.</p> <p>The effect of this is outlined in tables HO3 - HO7 of the CSDPD where overall there is a noticeable boost in housing numbers in areas such as Bradford City Centre, Shipley and Canal Road Corridor, South East Bradford and Keighley. This appears to be at the expense of settlements such as Addingham and Ilkley, areas of Bradford outside</p>	<p>The statement and analysis is incorrect. The baseline distribution is not derived from expected population change over the plan period – no government population projections are produced down to settlement level. It is simply a distribution based on the proportion of the district's population within that settlement at the 2011 census. It therefore distributes the housing requirement based on the existing size of the settlement.</p> <p>Secondly it is misleading in implying that numbers have been boosted in parts of the Regional City at the expense of other areas. The numbers have been boosted in parts of the Regional City if anything 'at the expense' of other parts of the Regional City where there are either environmental constraints, land supply issues or where development would</p>	423, 437

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	<p>of the south east and many of the Local Service Centres where housing is proposed to be constrained to a level below the identified need based on population.</p>	<p>make less of a contribution to regeneration.</p> <p>To illustrate this point, the population based distribution for the Regional City as a whole (which includes both the City Centre and the Shipley and Canal Road Corridor) along with the other 4 city sub areas would total 28,324. The actual allocation to the Regional City in the CSPD is 28,650. The resulting percentage distribution to the Regional City in the CSPD is therefore marginally higher at 68.1% as compared to the baseline population related distribution of 67.3%. This accords both with the Settlement Hierarchy approach within the Plan and also ensures that as far as is possible future growth is concentrated on those areas likely to see most household growth i.e. the Regional City.</p> <p>As table HO4 within the CSPD illustrates, although some parts of the Regional City have seen targets well above the baseline distribution figure, others such Bradford NE, NW and SW have all received targets well below the baseline distribution figure.</p> <p>Moving on to the Local Service Centres a total of 3,350 new homes are proposed which does lie 1,501 below what baseline population based distribution would imply. This is not unreasonable as population growth is expected to be disproportionately concentrated on the Regional City both because of the age profile of the population there and established patterns of immigration. Moreover the 1500 deficit figure is itself misleading as 1200 of this deficit is accounted for by just two settlements – Baildon where there is simply no land supply to deliver the baseline figure and Burley In Wharfedale where although land is available there are specific issues such as impacts on the S Pennines SAC / SPA which require development levels to be reduced.</p>	
14. HO3 - The	2. The difficulty in distributing housing in this	The Council do not agree with this point. A key role of any	423

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Baseline Distribution	manner is that it is reliant to a large degree on future detailed / allocating development plan documents. As many of these documents are yet to exist, even in draft form, it is questionable how robust this policy is and without having gone through the process of testing allocations at examinations it is difficult to see how such a policy can be fully justified.	Core Strategy is to indicate the distribution of development across different parts of the district. In order for the chosen distribution to be considered sound it must be considered to be both justified and effective. The Council has gathered a wide range of evidence that provide a robust basis on which to formulate its proposed distribution. These are indicated within both the Core Strategy itself and within the Housing Background Paper. It is patently untrue to imply that a distribution cannot be justified without each potential site allocation being tested at an Allocations DPD EIP. This is not a view made in the submissions by the other developers who have made comments on the Core Strategy and who have taken the wide range of evidence the Council has collected, added some other arguments of their own, and come to slightly different distributions.	
Proposals for Shipley Constituency			
1. HO3 – Proposals for Shipley Constituency	<p>1. The publication draft suggests a predicted increase of 8000 houses in my constituency; many of which are suggested to be placed in rural areas and upon green belt land that should be protected. The Government’s planning guidance is for Councils not to build on green belt unless in exceptional circumstances. The reasons given in the Core Strategy fall a long way short of the exceptional circumstances required to justify building on the green belt.</p>	The Council believes that the proposals within the Core Strategy including those relating to the use of green belt land to meet the objectively assessed need for new homes are fully justified and compliant with the NPPF. There is a clear unequivocal need to release land from the green belt and a clear indication in the Growth Study that there are large areas of land where such releases would not undermine the strategic functioning of the green belt and where development would be sustainable.	361
1. HO3 – Proposals for Shipley Constituency	<p>2. The following proposals are made in Shipley constituency –</p> <p>3,200 homes - Shipley and Canal Road Corridor 1,250 homes – Shipley 1,400 homes - Bingley 450 homes – Baildon 200 homes – Cottingley 200 homes - Burley-in-Wharfedale</p>	<p>While the objector may not agree with the proposed levels of housing growth for the settlements which lie within the Parliamentary constituency of Shipley, it is a ridiculous assertion that the numbers for these areas have been chosen at random. It is recommended that the objector reads the following documents to appreciate the approach taken by the Council:</p> <ul style="list-style-type: none"> Core Strategy Publication Draft, in particular the Strategic Core Policies, and the housing chapter; 	361

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	<p>400 homes – Menston 350 homes – Cullingworth 350 homes – Denholme 100 homes – Harden 200 homes – Wilsden</p> <p>The council seem to have chosen the development sizes at random, without much consideration to the local issues facing these areas, and whether they would be able to cope with the increases.</p>	<ul style="list-style-type: none"> • The evidence base in particular the Settlement Study, the Growth Study, the SHLAA and the Housing Background Paper and. • The Sustainability Appraisal and Habitat Regulations Assessment. <p>It is noted that the objector fails to indicate what approach he would take to accommodating the district’s housing needs, what evidence this would be based on, what levels of housing he would suggest that the settlements within his constituency should accommodate if any and on how his proposals would accord with the Government’s planning policies and guidance.</p>	
1. HO3 – Proposals for Shipley Constituency	<p>3. The proposals fail to recognise that many of the villages in Shipley Constituency already suffer from stretched resources and congestion issues.</p>	<p>Stretched resources and congestion at peak hours are problems which are not unique to the Shipley constituency. The Council are required to assess and then provide for future housing need and are seeking to do so whilst identifying the investment required to support that growth within its Local Infrastructure Plan.</p>	361
1. HO3 – Proposals for Shipley Constituency	<p>4. The proposed housing development in Airedale and Wharfedale will not satisfy the current housing demand that exists in the Bradford District. The demand for housing in the Bradford district is for affordable housing in the centre of Bradford. This demand is not met by proposing expensive housing in the outskirts of the Bradford district, which is likely to be filled by people from outside of the district altogether.</p>	<p>The Council disagrees with this assertion. The Council’s SHMA suggests that based on migration and other data, Bradford can be considered a separate housing market albeit with a number of sub areas which exhibit particular and consistent characteristics.</p> <p>It is incorrect to imply that the only area where there is significant housing need is in the centre of Bradford and also incorrect to suggest that the plan is proposing the building of expensive housing to be filled by people from outside the district.</p>	361
1. HO3 – Proposals for Shipley Constituency	<p>5. The HRS states that the bulk of projected population growth will be within the City of Bradford including Shipley and Lower Baildon and yet housing increases have been allocated throughout the district proportionately to the current population counts, which do not reflect anticipated future need.</p>	<p>This is incorrect. The HRS discusses in broad terms the drivers for future population growth but nowhere does it quantify housing need on a sub area basis. The housing targets are based on a wide range of criteria as explained in both the CSPD document itself and the Housing Background Paper, neither of which the objector appears to have read.</p>	117

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	There is no evidence provided which indicates the future need for 500 houses in Haworth, 200 in Oakworth and 100 in Oxenhope and these are likely to satisfy need that actually exists elsewhere, which is not the responsibility of Bradford Council and does not contribute to the reduction of the council's overall housing need	The settlements named all lie within the Bradford District and the extremely modest levels of housing development proposed within them are geared to wards meeting both local and wider housing need and to support the vitality of these centres.	
The Targets For the Regional City of Bradford			
1. HO3 – Targets for the Regional City of Bradford	1. Countryside Properties are fully supportive of the housing distribution targets set for the borough of Bradford	Support noted and welcomed	517
1. HO3 – Targets for the Regional City of Bradford	2. Concerns are expressed about the viability of sites within the City of Bradford. Despite the carrying out of a local plan viability assessment, the inclusion of Policy ID2 and a suitably flexible approach to the management of planning applications, many sites within the City of Bradford remain unviable without subsidy.	The objector highlights the work which has been undertaken to specifically test the viability of the Local Plan's policies and proposals. In the Council's view, this work together with the SHLAA suggests that the proposed targets for the Regional City, though challenging can be met. The viability study also makes a key point – that account needs to be taken of viability across the whole of the economic cycle and the plan period. Some sites which are unlikely to be picked up now in the current economic conditions may be implemented later in the plan period. The Council are supporting housing delivery within the Regional City in a number of direct and indirect ways most notably through the development of the growth areas within the Shipley and Canal Road Corridor and at Holme Wood via regeneration and an urban extensions.	157
1. HO3 – Targets for the Regional City of Bradford	3. The proposals for 6000 new homes in Bradford SE and 4,500 new homes in Bradford NW are noted and delivery of these would be assisted by previously developed sites such as those owned by Hallmark Cards.	The comments are noted.	431
1. HO3 – Targets for the Regional City of Bradford	4. We do not seek to reduce the general primacy and significance of the Regional City's contribution. In our evidence we have argued that the housing	The comments are noted.	447

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	requirement figures for the Regional City of Bradford should be maintained at the level proposed in the Publication Draft Core Strategy.		
Target For the Shipley & Canal Road Corridor AAP			
1. HO3 – Targets for the Canal Road Corridor AAP	1. CRUVL welcome the proposed distribution of new housing development particularly the apportionment of 3,200 dwellings (8% of district total) within the Shipley and Canal Road Corridor. This accords with the approved New Bolton Woods Masterplan which proposes the delivery of up to 1,600 high quality new homes	Support noted and welcomed.	510
1. HO3 – Targets for the Canal Road Corridor AAP	2. The identified figure for the Canal Road Corridor Area Action Plan should be increased from 3,200 dwellings and whether this is or isn't taken forward the Bolton Woods Quarry site should, in any event, be identified within the subsequent Allocations DPD and associated Shipley and Canal Road Corridor Area Action Plan documents specifically as a site confirmed to deliver a significant proportion of this housing land requirement.	The target for the Shipley & Canal Rd Corridor is based on the data from the SHLAA and emerging evidence from work carried out on the AAP. The proposed figure will be challenging to meet and at present there is little to support the achievability of a higher figure.	407
Target For Bradford SE - The target is too high			
1. HO3 – The Population Proportionate Target	1. Table HO3 allocates 28,324 houses to the Regional City of Bradford. That's a higher proportion of the District's houses than would be justified by population alone	This is both incorrect and a misunderstanding of Table HO3. Table HO3 does not 'allocate' anything. It is simply a factual and mathematical calculation of the housing target which would arise if the overall district wide housing target of 42,100 were distributed according to the proportion of the district's population within that settlement area (based on 2011 census and the Core Strategy defined settlement areas). The proportion of the district's population within the Core Strategy defined Regional City is 67.3% and 67.3% of the district wide housing target is 28,324.	412
1. HO3 – The Population Proportionate	2. Table HO3 shows then shows a further distribution to Bradford SE based on the numbers at Table HO1 and solely on population of 4,878.	This is incorrect. It does not indicate a further distribution of 4,878. The 4,878 is the Bradford SE element of the overall baseline distribution to the Regional City of 28,324. Bradford	412

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Target		SE as defined in the Core Strategy contains 11.6% of the total population and 11.6% of the district wide housing requirement amounts to 4,878	
1. HO3 – The Population Proportionate Target	3. The number of houses allocated to Bradford SE which, at 6000 is disproportionately high, being 14.3% of the allocation for the District as a whole.	No justification is given for this statement. The Council does not consider that the proposed target of 6,000 is disproportionately high. The target does lie above the baseline population proportionate target however this reflects the circumstances of both this sub area as one of the most sustainable locations for growth and reflects the circumstances within the other Bradford sub areas where land supply is more constrained. The proposal therefore reflects the evidence base and is both justified and effective.	412
1. HO3 – The Population Proportionate Target	4. The proportion of the finally accepted number of houses for the District intended to be allocated to Bradford SE should be readjusted to accord to population based proportionality and based on a lower district wide requirement of 32,699	The district wide housing target advocated by the objector is not justified nor appropriate and would not meet the objectively assessed needs of the district.	412
1. HO3 – The Population Proportionate Target	5. However the Publication Draft adjusts those figures at Table HO4 upwards by 336 for the Regional City of Bradford and by 1122 for SE Bradford. The principle justification for this disproportionate adjustment or “Reality Check” as the Plan describes it is the availability of a large tract of open Green Field Land in the Holme Wood Tong area.	<p>The Core Strategy and Housing Background Paper outlines the many criteria and factors which have determined the final distribution. Bearing in mind:</p> <ul style="list-style-type: none"> • the need to reflect where population growth is likely to be greatest, • the settlement hierarchy which in turn reflects access to jobs, services and transportation, • available and deliverable land supply; • the need to regenerate SE Bradford; • and the pattern of environmental constraints across the district <p>The Council considers that it is entirely appropriate for the Bradford SE area to accommodate a slightly higher proportion of the housing requirement than would be the case if the baseline distribution were followed (14.3% vs 11.6%). This assumption is also backed up by the results of the Growth Study which highlighted Bradford SE as one of the most</p>	412

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		<p>sustainable and appropriate locations for growth and for green belt release.</p> <p>Finally it should be stated that the target does not simply reflect the availability of a large tract of open land adjoining Holme Wood. It reflects the argument and evidence that this should be a sustainable location for growth.</p>	
2. HO3 – Impact on the historic environment	<p>1. We have set out in our response to Sub Area Policy BD1 (in respect of Holme Wood) our concerns about the levels of housing growth proposed in these areas and the potential impact which this might have upon the historic environment. At present, the plan fails to demonstrate that the scale of housing proposed for these areas is consistent with its Policies for safeguarding the significance of its heritage assets or with the requirements set out in NPPF Paragraph 126 to set out a positive strategy for the conservation of the historic</p>	<p>The Council has undertaken further strategic level analysis in particular with regards to the Registered Battlefield of Adwalton Moor and consider that the broad scale of development can be accommodated within South East Bradford. The detailed scale and extent of the urban extension is to be determined in the Allocations DPD and subject to further more detailed assessment as part of the site selection process which will include consideration of historic assets.</p>	103
Target For Bradford SW			
Target Has been set too low			
1. HO3 –Targets for Bradford SW	<p>1. Bradford SW is under allocated and has a surplus of 607 SHLAA site dwellings.</p>	<p>The Council considers that the proposed target for Bradford SW is justified and reasonable. Targets do not necessarily need to follow or use up all of the theoretical capacity within the SHLAA. As is outlined in the Core Strategy and Housing Background Paper the SHLAA uses a local policy off approach and therefore the SHLAA does not guarantee that all of the sites will be considered appropriate for housing allocation. The Bradford SW area will also need land for other non residential uses such as employment, local infrastructure and open space.</p>	439
Proposals For Thornton & Allerton Ward – Housing Targets Too High			
HO3 - Proposals for Thornton and Allerton ward	<p>1.Thornton and Allerton Ward includes the Local Growth Centre of Thornton which has been assigned a housing target of 700 new homes (1.7% of district wide total) and a small pert (the SW edge) of the Bradford NW sub area, the whole of which has been assigned a housing target of 4500 new homes.</p>		

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1. HO3 – Vacant Homes	1. Empty houses across the district need to be identified and brought back into use	As the objector knows, this is indeed being done. Moreover the district wide housing target has already been reduced by 3000 to take account of the commitment within the Council's Empty Homes Strategy to reduce the number of vacant properties, particularly long term vacants. Without this, the district wide housing requirement and therefore possibly the targets within the Thornton and Allerton wards would be even higher.	409
2. HO3 – Loss of green belt and green fields	1. Objection to the targets as this means the loss of green fields and green belt. The use of such land would also undermine the regeneration of other parts of Bradford and the take up by developers of brown field sites.	The Council has proposals to regenerate a number of areas of the district including the city centre, the Canal Road Corridor and Airedale and housing growth forms part of those proposals. There is no reason to suggest that regeneration cannot take place side by side with planned and co-ordinated development on some green field and green belt sites. It is unlikely, as the objector's implies, that placing a moratorium on the development of green belt sites will force developers to develop previously developed sites. Such an approach would exacerbate existing problems of undersupply of new homes in the district. If previously developed sites are in areas where there is a demand for new homes and such sites are genuinely available for development and viable they will be taken up.	409
2. HO3 – Loss of green belt and green fields	2. There is no need to identify green field sites, let alone release further land from the Green Belt.	This simply isn't correct. The objector provides no data or evidence to make such an assertion. The SHLAA data suggests that there is no way that the objectively assessed need for new homes in the district can be met without the use of both green field and green belt land.	409
2. HO3 – Loss of green belt and green fields	3. Taking account of current permissions, existing housing schemes, the significant numbers of empty homes and already identified brownfield sites, the City has significantly in excess of the required 5 year requirement. Therefore exceptional circumstances for use of green belt has not been proven. There are enough sites in the urban areas	This is factually incorrect and a statement which lacks any justification or evidence. The objector appears unaware of the Government's guidance on calculating a 5 year land supply and appears not to have read the SHLAA. For example empty homes cannot be counted in the 5 year land supply calculation, sites with permission are already included in the supply if they are assessed to be deliverable as are brownfield	409

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	<p>which are being neglected by developers such as the derelict Seabrooks Crisp factory in Allerton and the previous Soho Works site further towards the City.</p>	<p>sites and schemes underway. In short the 5 year land supply is at present calculated to be 2.3 years however the progression to adoption of this Core Strategy will facilitate progress on the allocation of land within the Local Plan resolve this. Finally the Council can confirm that both the Seabrooks Crisp factory site and the Soho Works sites have been identified and form part of the SHLAA (ref numbers NW/035 & NW/043). They are also within the 5 year land supply contributing dwellings within years 4 and 5 of the trajectory.</p>	
2. HO3 – Loss of green belt and green fields	<p>4. The proposals for this part of the District will result in the demise of the local villages since they are currently separated by green fields and the plans will simply join them all to become what is known as “Urban Sprawl”.</p>	<p>There are absolutely no proposals that these villages will be merged, neither would the housing targets remotely necessitate this to be the case.</p>	409
2. HO3 – Loss of green belt and green fields	<p>5. Policies in HO3 do not set out the basis for any local review of the Green Belt especially in areas of environmental or historical sensitivity and specific policies are needed to meet NPPF policy on Green Belt reviews.</p>	<p>Policy HO3 is concerned with the setting of settlement specific housing targets and not the nature of green belt reviews. Green belt policy and review is dealt with in Policy SC7.</p>	409
2. HO3 – Loss of green belt and green fields	<p>6. The infrastructure within the ward - roads, schools, drainage systems, doctors surgeries and dentists, cannot cope with such a large amount of new development.</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 Thornton & Allerton and will be an issue more or less wherever the new homes are allocated.</p> <p>The district's population is growing and will continue to do so and therefore infrastructure and services will need investment and improvement across the district. The Council has produced an Local Infrastructure Plan to address these issues. It has consulted with utility providers as part of that work. The Local Infrastructure Plan indicates a number of challenges in</p>	409

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		<p>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>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, should assist it in both the planning process and its ability to bid for funding.</p>	
2. HO3 – Loss of green belt and green fields	7. The village identities of Thornton, Allerton, Sandy Lane, Wilsden, Cullingworth, Harden, Harecroft, Ryecroft, and indeed Denholme will be lost and future generations will no longer have that rich legacy of village life to enjoy.	The Council disagrees with this statement. No justification is given for such sweeping assertions. In some cases here sub areas are quoted such as Sandy Lane where the Core Strategy has not indicated a target and where the land releases, if any, will only be determined once the Allocations DPD has been produced and in others such as Harden (where just 100 homes are proposed) there is no reason to indicate that the scale of proposed development would have any affect on their identities. Finally it is also disappointing that the objector appears to have no appreciation of the positive role that modest amounts of development will have on those villages by providing affordable housing to people who want to remain in those villages and in supporting village services.	409
2. HO3 – Loss of green belt and green fields	8. A number of objections are received in relation to specific sites in the ward which are within the SHLAA.	No comments will be made on any specific sites. The Core Strategy does not contain any site specific proposals and the SHLAA does not represent policy. These are matters which will be addressed in the Allocations DPD.	409
Policy HO3 – Principal Towns - Keighley			
The Keighley Target Has Been Set Too Low			
1. HO3 – Keighley Targets have been set to low	1. The target for Keighley should be increased. The SHLAA shows that there is identifiable capacity.	The SHLAA cannot be the only information and criteria on which housing targets are set. The mere existence of additional capacity within a settlement does not in itself justify why it would be an appropriate and sustainable approach.	435

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1. HO3 – Keighley Targets have been set to low	2. Keighley has a surplus of 730 dwelling sites above the Core Strategy allocation. The allocation is 4,500 dwellings whereas the allocation in the CSFED was 5,000 dwellings. Keighley has the land supply to provide 5000 dwellings and local infrastructure and transport links to support them.	The Council considers that the proposed target for Keighley is justified and reasonable. Targets do not necessarily need to follow or use up all of the theoretical capacity within the SHLAA. As is outlined in the Core Strategy and Housing Background Paper the SHLAA uses a local policy off approach and therefore the SHLAA does not guarantee that all of the sites will be considered appropriate for housing allocation. The Keighley area will also need land for other non residential uses such as employment, local infrastructure and open space.	439
Policy HO3 – Principal Towns - Bingley			
The Bingley Target Has Been Set Too Low			
1. HO3 - Settlement Hierarchy	1. 6,700 new homes are due to delivered in the District's 3 Principal Towns. We query why some 67% of these homes are to be directed towards Keighley and only 21% is suggested for Bingley. This is unbalanced when considered within the context of the Settlement Hierarchy (Policy SC4). A larger proportion of new homes should be considered for Bingley. As a Principal Town, the Council recognises that it is a sustainable settlement for growth and it therefore follows that it should accommodate a higher number of new homes than Policy HO3 currently suggests.	It is unclear why the objector thinks that there has to be equal or even distribution of housing numbers between the 3 Principal Towns just because of this designation. The towns are different in size, and the circumstances relating to each are different. The circumstances relating to the setting of the Bingley target are set out in the Core Strategy and the Housing Background Paper. The evidence and analysis support a much lower housing target within Bingley as compared to Keighley. Bingley is a smaller settlement and is more constrained with regards to green belt and land supply.	186
2. HO3 - SHLAA / Land Supply	1. Bingley has a similar surplus to Keighley – SHLAA capacity of 796 dwellings more than its allocation. It is a sustainable location with good transport links so it should get a higher allocation than 1400 dwellings. Encroachment on the green belt is not a justification as this would be the case in many other areas.	The Council consider that the proposed target for Bingley is both justified and reasonable. It is not correct to suggest that the circumstances of Bingley and Keighley are similar. There is insufficient land supply to support a figure similar to that of Keighley. Keighley is a larger settlement. Bingley does have greater restrictions with regards to green belt. There are some areas around Bingley where green belt release would threaten the strategic functioning of the green belt. Finally the housing targets do not necessarily need to follow or use up all of the theoretical capacity within the SHLAA. As is outlined in the	439

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		Core Strategy and Housing Background Paper the SHLAA uses a local policy off approach and therefore the SHLAA does not guarantee that all of the sites will be considered appropriate for housing allocation. The Bingley area will also need land for other non residential uses such as employment, local infrastructure and open space.	
The Bingley Target Has Been Set Too High			
1. HO3 - Baseline Population Proportionate Distribution	1. The method by which 1400 was calculated as proportionate for Bingley is imprecise and to a degree hypothetical: no specification of the GIS used is provided, how it was selected and applied to arrive at numbers proposed in the Draft. In this regard the Draft is not Sound.	<p>The comments are incorrect. The method by which the baseline population proportionate distribution was calculated is explained in the Core Strategy (paragraph 5.3.48) and the Housing Background Paper (paragraphs 5.21 to 5.24). The criteria used to determine whether the final proposed targets should vary from the population proportionate figures is also explained in these documents.</p> <p>Apart from appearing to take a position of general opposition to development in the area, the Greenhill Action Group fails to indicate what alternative methods, data and approach they would advocate using, what results that would indicate, how much housing (if they are prepared to accept any) should be provided in Bingley and how their approach would accord with the Government's National Planning Policy Framework and its requirement for authorities to boost significantly the supply of new housing.</p>	483
2. HO3 - Sty Lane, Micklethwaite	1. The Draft relies on 420 houses from a site that (after a PI in 2003) was allocated for housing but is no longer so allocated because the Council omitted to 'save' its RUDP H2 schedule. In this regard the plan is not sound, not deliverable and, arguably, not legal.	The objector has a record of long standing opposition to development in the area and in particular to the granting of planning permission on the site at Sty Lane Micklethwaite. The fact that the site along with others was not saved in the RUDP in October 2008 was not because the Council had changed its view of its status as an eminently suitable and sustainable location for development but because of an administrative and legal error by the Council in the process of saving policies and allocations. The Council as a result resolved to recognise the status of formerly allocated housing sites as a material consideration in considering future	483

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		<p>planning applications.</p> <p>The latest submitted planning application for the development of the site, in the Council’s view resolves the only issue on which the Secretary of State refused permission previously – that of the emergency access arrangement. The latest planning application has however been called in by the Secretary of State. It is hoped that permission will be granted and the site will be developed during the plan period.</p> <p>However notwithstanding the above, the land supply for meeting the proposed target of 1400 dwellings in the Bingley area however is not totally dependent on the Sty Lane site and could be accommodated even if that site were not developed. SHLAA 2 capacity in Bingley amounted to nearly 2200 dwellings.</p>	
3. HO3 - Providing homes for Leeds	<p>1. The proposals in the main for Bingley and area provide commuter housing for residents who currently live in Leeds not houses to meet our needs, Bradford should not be forced by these proposals into providing homes we do not require. Let Leeds deal with its own housing demand and Bradford with its.</p>	<p>The comments are incorrect and without any recourse to evidence or justification. Bingley itself is a vibrant town lying at the heart of Bradford District and offering a range of employment opportunities. It is located within the Airedale corridor with easy access to the larger centres of Keighley and Bradford as well as to locations outside the district such as Leeds.</p> <p>To suggest that there is no housing need in the area and that any new homes would simply serve commuters to Leeds is a baseless argument. Leeds is indeed providing for its own housing need – proposing to build around 70,000 new homes – and in similar vein Bradford must accommodate its need which is estimated to be for over 40,000 new homes. Bingley is being proposed as accommodating just 1400 or just .3% of the district wide housing requirement.</p>	202
4. HO3 - Bingley is not a Principal Town	<p>1. Bingley is not a Principal Town and the Council has run down many facilities within the town.</p>	<p>The Council consider that it is entirely appropriate for Bingley to be designated as a Principal Town. If the objector wishes to see the town remain vibrant and for resources and services to</p>	152

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		be maintained or reinstated it is not logical to argue for its status as a Principal Town to be demoted and not logical to fail to provide new homes and new investment	
5. HO3 - The Area Has Already Seen A Lot of Development	1. The area has already seen a lot of development such as at Eldwick and Gilstead.	While the area has seen some development in the past this cannot be a prime criteria for the Council's future housing distribution strategy as there is no indication that Bingley cannot or shouldn't accommodate a modest proportion of the district's future housing needs.	152
6. HO3 - The HRA	1. The N of Bingley lies within the 2.5km precautionary zone re South Pennine Moors SPA.	The 2.5km zone does not preclude all development. The Council has commissioned further work to ascertain those areas within the 2.5km zone which are most sensitive by virtue of the presence of key supporting habitats or where designated species have been recorded. This work has then been cross referenced against the spread of potential deliverable sites as indicated in the SHLAA. The proposed targets for settlements such as Bingley can be met without affecting those most sensitive areas.	152
7. HO3 - Biodiversity Loss	1. Housing development is causing biodiversity decline. Economic growth is the enemy.	The Council does not agree with this view. It would also point to Policy HO7 which sets out the principles which will be followed in assessing and selecting sites for allocation. Criterion F2 states that sites will be prioritised which would enhance biodiversity or contribute to the aim of achieving no net loss of biodiversity.	152
8. HO3 - Increased car use	1. Development will bring increased car usage, an enlarged carbon footprint, and reduction in air quality which is all at odds with the key ambitions of the Draft and the NPPF	Given the scale of population growth expected within the district it is inevitable that car usage will increase. However the Council is proposing a housing distribution which, within the limits and constraints imposed by other variables such as land supply and environmental matters, reflects the existing concentrations of jobs and services and the road and public transport network. It also reflects the fact that certain settlements such as Bingley have the advantage of offering a choice of transport modes with high frequency rail and bus alternatives to the private car. The Core Strategy and subsequent plans and programmes are also bringing forward improvement to the transport network and to maximise	483

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		opportunities for modal shift to non car uses..	
9. HO3 - Infrastructure	1. The rail network particularly in the Aire valley is at capacity on the commuter run to Leeds and close to Bradford, adding thousands of journeys on a maxed out system will only add to the congestions woes on our highways, very detrimental to the economic prosperity of the district.	<p>Core Strategy Policy TR5 aims to protect and enhance all Highway, Rail and Bus Networks to provide efficient and affective travel throughout the District. The Policy supports improvements to transport provision in the more isolated and poorly serviced areas of the district.</p> <p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p> <p>The Council has confidence that any future capacity issues for both road and rail, arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>The Core Strategy will be used to inform infrastructure partners longer terms investment decisions.</p>	202, 483
Policy HO3 – Principal Towns - Ilkley			
The Ilkley Target Has Been Set Too Low			
1. HO3 - Objectively Assessed Needs	1. We object to the current approach to the distribution of housing development and the associated settlement targets as they are not seeking to deliver the objectively assessed housing need across the Borough.	There is no NPPF requirement to individually calculate an objectively assessed need for every town and village. The requirement relates to the district's needs as a whole. The objector also fails to give any indication as to what they consider the quantum of need is within Ilkley and on what they base this judgement.	484
2. HO3 - Ilkley as a Principal Town Should Have a Higher Target	1. Several representations relate to the argument that the housing target should be higher as it is claimed that it does not reflect Ilkley's role as Principal Town within the settlement hierarchy the level of services it offers, its good rail links and its sustainability as a location for housing .	The Council agree that Ilkley is a sustainable location which provides a range of facilities, services and employment opportunities to the area. This is reflected by its classification as a Principal Town within the settlement hierarchy. However the quantum of housing proposed in the area also has to reflect the pattern of key environmental constraints and also	109, 400, 484

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		the land supply. The placement of a settlement within a particular tier of the settlement hierarchy does not and should not lead to a specific minimum number of dwellings irrespective of other evidence.	
2. HO3 - Ilkley as a Principal Town Should Have a Higher Target	2. The quantum of development proposed will not support the settlement's role as a Principal Town, which should be the main local focus for development.	The Council considers that the development of 800 new homes together with additional employment allocations and investment in local services will most certainly support Ilkley's role as a Principal Town. The level of housing development proposed in Ilkley is significantly in excess of what has been planned for in previous plans, would require one or more expansion areas / green belt deletions. Together with proposed employment development and community facilities this would represent a level of growth which reflects the settlement's role and function.	400
2. HO3 - Ilkley as a Principal Town Should Have a Higher Target	3. The quantum of development proposed in Ilkley is low compared to the other two principal towns.	The quantum is different because the circumstances are different – the size, location and character of Ilkley is different, the land supply situation is different and the combination of environmental considerations is different.	400
2. HO3 - Ilkley as a Principal Town Should Have a Higher Target	4. There are two proposed Local Growth Centres (Queensbury and Silsden) where a larger quantum of new housing is proposed compared to the Principal Town of Ilkley with the distribution to the other two Local Growth Centres being just 100 dwellings per settlement lower than is proposed in Ilkley.	These differences are clearly apparent within the text of the Core Strategy and also the Housing Background Paper. Again it should be emphasised that the settlement hierarchy is defined and based on a range of factors and not tied to the amount of housing growth proposed.	400
2. HO3 - Ilkley as a Principal Town Should Have a Higher Target	5. The reductions for the Principal Town of Ilkley of 400 dwellings (based on the population baseline assignment) and 500 dwellings compared with the FEDCS are not justified by the evidence the Council are seeking to use. Ilkley as one of the Principal towns is regarded generally in the PDCS as a location for growth and enhancement of its key functions.	The Council disagrees. Despite the role and nature of the settlement, the proposed housing target also needs to reflect the environmental considerations most notably the potential impact on the SPA / SAC.	447

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	<p>Ilkley has several roles including its operation as the core service centre for all the Wharfedale settlements. Its very good range of retail and service facilities coupled with its strong public transport connections further support a higher level of growth in this location. Our detailed work to date in this settlement establishes that there is capacity for an enhanced level of growth similar to the housing figures in the FEDCS and that this can be achieved with a series of environmental enhancements. Assistance with the delivery of new infrastructure, affordable housing and jobs is further justification for the enhanced levels of development</p>	<p>The Council agrees with much of this description of the town of Ilkley however it differs in so far as it considers that the potential impacts of development on the S Pennines SPA justify a lower housing target than that set out in the CSFED. That said 800 dwellings is still a substantial target and it should also be borne in mind that the land supply around and within the town will also have to provide for other uses such as employment and educational facilities.</p>	
2. HO3 - Ilkley as a Principal Town Should Have a Higher Target	<p>6. To be sound, and to reflect the settlement's position within the settlement hierarchy, it is maintained the proposed distribution should be increased to 1,750 dwellings. This is also to assist in the delivery of houses in the early part of the plan period given land constraints in some settlements at the top of the settlement hierarchy.</p>	<p>No justification whatsoever is provided for this figure. The arguments that there are constraints and deficiencies in the land supply to meet the targets elsewhere is incorrect.</p>	400
3. HO3 - The Population Proportionate Target	<p>1. The proposed target lies substantially below the population proportionate target of 1194.</p>	<p>The Core Strategy document and the Housing Background Paper explain the reasons why the target lies below this level.</p>	109, 484
4. HO3 - Affordable homes	<p>1. Increased target would provide much needed affordable homes.</p>	<p>The SHMA indicates that the bulk of affordable housing need is within the Bradford area and not within Ilkley.</p>	109
5. HO3 - SHLAA / Land Supply	<p>1. The SHLAA has indicated that available housing land supply in Ilkley can accommodate number of dwellings greater than 1300.</p>	<p>The SHLAA cannot be the only information and criteria on which housing targets are set. The mere existence of additional capacity within a settlement does not in itself justify why it would be an appropriate and sustainable approach.</p>	109
5. HO3 - SHLAA /	<p>2. The Council's reasoning for proposing such a</p>	<p>Both the Core Strategy itself and the Housing Background</p>	400

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Land Supply	low quantum of new housing in Ilkley is not supported by evidence that clearly demonstrates that the quantum of land around Ilkley cannot be developed such that only 800 new dwellings could be delivered	Paper indicate how the proposed housing targets were set and the particular circumstances resulting in the Ilkley target. These relate in particular to environmental considerations such as the impact on the S Pennine Moors SPA. The target is therefore considered sound and justified in relation to the evidence base.	
5. HO3 - SHLAA / Land Supply	3. The Council has not presented sufficient evidence to demonstrate that a higher quantum of development cannot be delivered in and around the settlement	The Council disagrees. It is also pointed out that the issue at question is not whether further development can be accommodated (with regards to land supply etc) but whether it should be accommodated by reference to its potential impact on environmental features of international importance.	400
5. HO3 - SHLAA / Land Supply	4. As referred to in detail in the Johnson Brook representations, the proposed distribution of housing is unsound as the proposed approach cannot be justified given evidence relating to land constraints at the top of the settlement hierarchy and the ability of settlements in the Wharfedale area to accommodate a higher level of growth than is proposed.	The Council has, elsewhere in this document addressed the points on land supply at the top of the settlement hierarchy made by Johnson Brook. It should also be pointed out that Johnson Brooks submission is not proposing any change to the housing targets within the Regional City which is at odds with the idea of a supposed land supply deficiency.	400
6. HO3 - The HRA	1. There is no justifiable reason why housing development can not take place in the 2.5km buffer unless valuable habitat is being lost - which is not the case. Well landscaped schemes with new trees and hedges provide some betterment for bird populations when compared to a field used for grazing of sheep or cattle.	The Council and the HRA Report are not suggesting that some sites within the 2.5km buffer zone can not be brought forward. What the HRA did indicate was that the housing targets set within the CSFED meant that the ecological integrity of the SPA was likely to be adversely affected and that housing quantum in the area around Rommbalds Moor in particular should be reduced. This indicates a lack of understanding of the role which the area around the SPA provides for the relevant bird species. The loss of key feeding, foraging and breeding areas would be unlikely to be compensated for by the design of landscape features within development schemes.	109
6. HO3 - The HRA	2. The reason given for reducing the housing target in Ilkley is that the findings of the Habitats Regulations Assessment has led to “significant	The Council are required to have regard to the Habitats Regulations Assessment and has formulated its housing targets accordingly. The reference made by the Council is to	484

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	<p>areas of the district being effectively ruled out for accommodating significant additional development due to the impacts on the internationally important South Pennine Moors SAC/SPA”</p> <p>The accompanying Ecologist Letter submitted with this response supports our conclusion that this is not a requirement arising from the HRA and that other solutions for ensuring development does not result in unacceptable harm to the SPA, involving mitigation and improvement of alternative habitat sites, are available.</p>	<p>development over and above that made within the CSPD. The CSPD is not ruling out development either within Ilkley as a whole nor within the 2.5km buffer zone and contrary to the objectors comments is still proposing significant development and growth in this area.</p> <p>The Core Strategy is merely reducing the scale of development to a level where there is adequate confidence that development can be accommodated without undermining the ecological integrity of the SPA. Further details of the Council’s response to the HRA is given in the updated Background Paper 1 issued at submission and in responses earlier in this table.</p>	
7. HO3 - Other Issues	1. Ilkley’s housing allocation should be increased at the expense of Keighley’s which should be decreased.	The Council disagrees.	109
7. HO3 - Other Issues	2. Policy TR3 provides for improvement of the public transport interchange which will make Ilkley more accessible and sustainable;	The proposed improvements to public transport services is designed to ensure that the growth planned for the area is sustainable. It is not a justification for even more growth.	109
7. HO3 - Other Issues	3. There is strong market demand in Ilkley for new homes and development in this area would be viable, unlike some other areas.	The Council do not question that development in the Ilkley area would be viable not that there would be a significant level of demand for homes in the area. It contends however that this is not in itself sufficient to justify a higher level of development.	?
7. HO3 - Other Issues	4. The Ilkley proportion should go up, with lower density, well landscaped development which would support habitat – HO3, SC8	The Council disagrees. The target is appropriate bearing in mind the evidence and the need to avoid or mitigate impacts on the SPA. The most appropriate densities for Ilkley will be determined within the local Plan.	109
The Ilkley Target Has Been Set Too High			
1. HO3 - The target is too high	1. 800 homes in Ilkley is too high	The Council disagrees. The Council have significantly reduced the proposed amount of new housing to a level which would still support the role of Ilkley as a Principal Town and provide affordable homes but reflect the character of the area and key environmental constraints. Over a 17 year period, the envisaged growth could be planned and managed sensitively	9, 59, 74, 87, 88, 92, 111, 120, 125, 141, 143, 224, 228, 271, 276, 279, 290, 296, 297,

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		and delivered in conjunction with new infrastructure and employment opportunities. It will therefore allow the town to prosper rather than stagnate. The proposed housing target lies well below the population proportionate target which shows that the Council have reacted to both the developing evidence base, the HRA, and the concerns of local residents. The overwhelming focus of the Core Strategy in terms of development is on the Regional City of Bradford where over 68% of the district's overall housing requirement will be focused compared to just 1.9% within Ilkley.	301, 313, 315, 316, 320, 323, 324, 325, 329, 330, 331, 332, 337, 344, 363, 375, 403, 404, 406, 410, 426, 443, 453, 454, 466, 478
2. HO3 - How the Target Has Been Calculated	1. Unclear how the housing apportionment for Ilkley was calculated	The approach to determining the housing targets and the evidence on which it was based is clearly set out within the Core Strategy (paragraphs 5.3.39 to 5.3.64) and the Housing Background Paper.	7, 8, 9, 10, 12, 15, 16, 17,18, 19, 20, 23, 30, 31, 67, 72, 74, 93, 115, 118, 131, 133, 137, 149, 155, 158, 159, 197, 217, 222, 236, 268, 267, 268, 303, 309, 319, 334, 341, 352, 375, 400, 403, 405, 437, 449, 450, 466, 469, 470, 471, 472, 518
2. HO3 - How the Target Has Been Calculated	2. The Core strategy does not include specific evidence or justification as how these housing targets have been calculated.	The Council disagrees. The process, criteria and evidence on which the targets have been based is set out in both the Core Strategy and the Housing Background Paper.	170
2. HO3 - How the Target Has Been Calculated	3. The initial allocation Baseline Distribution of Housing Requirement based solely on population in Table HO3 suggests that Ilkley's allocation of 1,194 should be slightly lower than Baildon's of 1,351. So why having assessed environmental, social and	The reasoning behind the housing distribution, in particular where significant adjustments are made to the initial baseline distribution are explained within the Core Strategy itself and the Housing Background Paper together with the data within the SHLAA. Baildon's greater adjustment downwards reflects	116

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	economic factors has Ilkley been allocated 800 while Baildon’s target is reduced to 450	its position in a lower tier of the settlement hierarchy together with the lack of available and deliverable land within or adjoining Baildon. It reflects that the settlement area as defined in the Core Strategy means that it is land locked to the south so cannot expand there, has limited opportunities within the settlement and has landscape, topography and S Pennines SPA constraints to the north. Development in the Baildon area is also limited by its proximity to the Saltaire World Heritage site. Ilkley has large and deliverable land supply, and although constrained by proximity of the SPA boundary to the south it does have sustainable expansion options to both the east and west.	
2. HO3 - How the Target Has Been Calculated	4. Bradford’s plan was carried out on a purely percentage basis for where the houses are needed and is therefore incomplete.	This is incorrect.	92
3. HO3 - Windfall	1. There has been little understanding of the number of windfall sites carried out over the last 10 years. The DCLG latest comments regarding inclusion of these windfalls should be set against these figures for homes required.	<p>This is incorrect. The Council monitors both planning permissions and completions (including windfall) on a regular basis and therefore is aware of the number of homes delivered on windfall sites in recent years.</p> <p>Windfall sites are defined in the NPPF as: “Sites which have not been specifically identified as available in the Local Plan process.”</p> <p>The last plan which was put in place was the RUDP which was prepared during 2001-2, some 13 years ago, and adopted in October 2005. It is therefore not surprising that windfall sites have become the main contributor to supply by number and proportion, as the actually allocated sites have been gradually built out and there has been no new Local Plan to formally identify and allocate recycled land and sites as they become available.</p> <p>This is not the position going forward. The planning system</p>	92, 516

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		<p>now incorporates a requirement for a more rigorous analysis of potential land supply in SHLAA's which was not in place when the last RUDP was prepared and the Council is now preparing a new allocations plan based on its SHLAA. The SHLAA and Allocations process will sweep up any current and emerging sites or buildings and if sustainable and deliverable will allocate them. They will not therefore be windfalls.</p> <p>The Council does not therefore think it would be either appropriate or in line with the principle to plan positively to meet the housing needs of the district to include a windfall allowance within the plan period. It considers that bearing in mind past under delivery of housing, the current shortages of homes within the main urban areas and the projected rapid increases in households there is a strong argument that there should be certainty and confidence that an adequate land supply for the plan period is in place. Allocating less and instead relying on a windfall allowance would reduce that certainty.</p> <p>The Council would also point out that there has been no change in the National Planning Policy Framework, paragraph 48 of which states that, "Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens." The key points to take from this paragraph is that there is no actual requirement to include a windfall allowance, that if a local authority proposes to make such an allowance the evidence to underpin it must be compelling and realistic.</p>	
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		<p>The Council's view is that there is no case for an inclusion of a windfall allowance within the first 5 years of the plan period. This is in fact the period when there is most certainty over the nature and spread of sites which are likely to come forward via the information gathered within the SHLAA. As indicated above, since all sites within the SHLAA are candidates for allocation within the Local Plan none of those which are deliverable can be considered to be windfalls. Moreover the site size threshold for inclusion in the SHLAA been reduced to just 0.2ha or 5 dwellings meaning that the range of sites which would be ineligible for inclusion in the Local Plan and which would therefore deliver windfalls has been reduced (the RUDP had a site size minimum of 0.4ha).</p> <p>The Council's conclusion therefore is that while it is likely that windfall will make an ongoing contribution it is likely, for the reasons set out above, to be at a much lower level than in the recent past. It considers that any contribution made should be viewed as providing a modest level of additional supply that will provide added insurance that the required rates of housing delivery will be met.</p>	
4. HO3 - Ilkley not a Principal Town	1. Ilkley should not be considered a Principal Town	The Council disagrees. Ilkley is a sustainable location which provides a range of facilities, services and employment opportunities to the area. This is reflected by its classification as a Principal Town within the settlement hierarchy. The designation reflects the evidence base in particular the Settlement Study. The designation of Ilkley as a Principal Town has been established in successive plans such as the RSS and the RUDP and nothing has changed to suggest that Ilkley does not play the sort of role as was the case when these plans were prepared.	116, 516
5. HO3 - Impact on habitats / SPA	1. A number of objections are made to the proposed housing target based on concerns about the impacts on the S Pennines SPA and SAC. It is also suggested that 800 homes in Ilkley is at odds	The Core Strategy must bring forward proposals to meet the districts needs for new housing in a way which will not adversely affect the ecological integrity of areas such as the S Pennines SPA and SAC and the Habitat Regulations Reports	92, 116, 516 301, 302, 319, 358

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	with the approach of the plan (Para 103, Policy SC8)	have guided the development of a suite of policies and proposals to ensure that this is the case. The CSPD has reduced the levels of development in the most sensitive areas, most notably the settlements within Wharfedale, and included proposals which allow for management and mitigation of any impacts of new development. There is therefore no conflict between the proposed housing target and Policy SC8.	
5. HO3 - Impact on habitats / SPA	2. The Habitats survey showed the need to limit growth in areas in such close to the moors.	The Council has indeed reduced the amount of growth in proximity to the SPA and the revised HRA considers that adequate measures have been taken to ensure that adverse impacts on the SPA will be avoided or mitigated.	74, 317
5. HO3 - Impact on habitats / SPA	3. Assessing the impact of development within Ilkley's Bi site requires more work before decreasing apportionment to 800	<p>The Council disagrees. The Council has commissioned and carried out extensive work to identify key areas within the 2.5km buffer zone and to assess likely recreational impacts. It has reduced housing numbers to a level that will ensure that any key supporting habitats can be avoided and put in place policies and proposals to manage and mitigate impacts.</p> <p>The updated HRA Report therefore provides more clarity about the impact pathways in the HRA that have exercised an influence over settlement housing targets, including the use of bird and habitat survey work outputs to assess SHLAA 2013 sites. Assessment of the bird and habitat survey work outputs allowed the Council to have confidence that land to meet the level of development identified can be accommodated. While the HRA work that has taken place to date is considered to be sufficiently robust in relation to the level of risk and strategic decision making involved in a core strategy, it indicates that more detailed work will take place to inform the Allocations DPD.</p>	2, 8, 35, 87, 159, 180, 265, 311, 344, 358, 367, 370, 378, 452, 464, 469, 470, 506
5. HO3 - Impact on habitats / SPA	4. Housing numbers have reduced on account of the HRA but by only 38% in Ilkley compared to 56% across Wharfedale as a whole. Ilkley's reduction of apportionment due to the HRA	Firstly of all the facts are as follows – the CSPD proposes a total of 1,600 new homes in Wharfedale which is a reduction of 48% when compared to the CSFED total of 3,100. The CSPD proposes 800 new homes in Ilkley which is a reduction of 38% compared to the CSFED total of 1,300. It is illogical to	12, 15, 17, 18, 19, 20, 21, 23, 30, 67, 72, 74, 93, 131, 133, 149, 155, 158,

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	should be 56% in line with the rest of Wharfedale.	imply that the % reduction should be the same in each settlement as the evidence and the circumstances are different in each case. Within Wharfedale Ilkley is a Principal Town and should in the Council's view be the focus of new housing development in the area. The different reductions also take account of the land supply position in each case and the HRA survey data.	319, 334, 352, 363, 385, 405, 449, 450, 452, 465, 466, 469, 470, 501, 516
5. HO3 - Impact on habitats / SPA	<p>5. Although the Habitats Regulations have reduced the number of homes for Ilkley, there has been no allowance made for the many green routes through town to the River Wharfe i.e., Ben Rhydding Drive, Ben Rhydding Road, Backstone Beck, Heber's Ghyll and Abbeyfield links to the Moor.</p> <p>The plan fails to show that the number of dwellings can be justified in the light of the constraints of the designated SPA / SAC the whole town is within 2.5 Kilometres of the Habitats Protection Zone</p>	<p>The Council has discharged its responsibilities as far as the HRA is concerned and have proposed a revised distribution which would not adversely affect the S Pennines SPA / SAC. If there are other reasons to preserve green routes within the town then this can be addressed within the Allocations DPD.</p> <p>See the answers above. Also the HRA does not rule out development within or adjoining Ilkley.</p>	2, 7, 35, 311, 378, 506
5. HO3 - Impact on habitats / SPA	6. Ilkley's apportionment should be reduced further because finding development outside the 2.5km zone exerts more pressure on Green Belt to the east and west of the town.	It is unclear what the objector means. Both the east and western sides of the town also lie within the 2.5km zone. It should be pointed out that neither the HRA nor Policy SC8 seek to rule out all development within this zone.	159
6. HO3 - Localism	1. The proposal represents the imposition of a top down target contrary to localism. Neighbourhood Plans are best able to decide where any new homes should be built, not a top down approach.	This is incorrect. The Government's Localism provisions allow for the creation of local neighbourhood plans but these plans must be in conformity with the Local Plan produced by the Council. It is the Council's role to determine the strategy for the district and this involves determining the district's need for new homes and then determining the most sustainable way to distribute growth and deliver the required homes.	116, 170, 401
7. HO3 - No account of previous completions	1. Around 500 new houses since 2004 have been ignored / excluded from the plan.	It assumed that the comment is referring to development within Ilkley since 2004. The objector is wrong. Net completions across the district since 2004 have been subtracted from the district wide housing requirement. The requirement for new homes therefore already takes account of those homes built since 2004 and would be even higher if that	128

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		were not the case.	
7. HO3 - No account of previous completions	2. The 2001 Census records 6,046 dwellings in Ilkley, of which 5,736 were occupied. The Bradford Observatory notes that in the second quarter of 2013 there were 6,790 dwellings, 6,427 of which were occupied. This suggests that over 700 new dwellings had been built in Ilkley in a period of 12 years.	<p>First of all with regards to the data the objector is comparing data from two different sources. A more reliable comparison can be found by visiting the ONS Neighbourhood Statistics web pages. This indicates a dwelling stock of 6,162 in March 2001 and a dwellings stock of 6,678 in March 2011. This represents an increase of 516 over a 10 year period. New dwelling stock can arise from a number of sources such as sub-division of properties, and conversions from other uses, as well as new sites.</p> <p>Therefore while the area has seen some development in the past this cannot be a prime criteria for the Council's future housing distribution strategy as there is no indication that Ilkley cannot or shouldn't accommodate a modest proportion of the district's future housing needs.</p>	116
8. HO3 - There Is No Housing Need In Ilkley / The Need is in Bradford	1. There is no evidence that Ilkley needs more housing. It is Bradford that needs housing. Local need not used to determine Ilkley's housing target.	<p>The Council disagrees with the implication from the objector that there is no need for any new housing in Ilkley. The objector fails to indicate how they have come to such a sweeping conclusion and what evidence, if any, they have used to come to that conclusion. There are plenty of indirect indicators which suggest both demand and need for new homes, particularly affordable homes within the settlement.</p> <p>The Council's approach is to determine the district wide need for new homes and to distribute this in the most sustainable way possible focusing the majority of development on those areas where natural change and migration are expected to be greatest and in accordance with the Council's settlement hierarchy. This means that the Regional City of Bradford has been assigned around 68% of the new housing required. The Principal Town of Ilkley by contrast has been assigned just 1.9%.</p>	92, 128, 170, 440
8. HO3 - There Is No Housing Need	2. Housing should be located in Bradford and Keighley where there is more existing infrastructure,	This is precisely what the Core Strategy is proposing.	35, 51, 73, 87, 92, 96, 111,

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In Ilkley / The Need is in Bradford	predicted growth and need.	A total of 33,150 new homes or 78.7% of the district wide housing requirement is proposed for the Regional City of Bradford and the Principal Town of Keighley combined. This is approximately 41 times higher than the apportionment proposed for Ilkley which is just 800 new homes or 1.9% of the district wide total.	125, 142, 143, 144, 148, 149, 163, 171, 203, 204, 205, 211, 213, 223, 225, 236, 270, 272, 273, 277, 291, 303, 316, 358, 361, 365, 464, 465, 467, 472, 480, 500, 521
8. HO3 - There Is No Housing Need In Ilkley / The Need is in Bradford	<p>3. The plan places a disproportionate and unjustified level of housing in the highest value area of the District (Wharfedale) while neglecting to address the housing needs of the population of the Bradford MDC area.</p> <p>Housing should be built in Bradford instead where there is the infrastructure, where a shopping mall is being built and where there is space to build affordable housing.</p>	The Council disagrees. The targets are neither unjustified nor disproportionately high. The settlements which comprise Wharfedale – Addingham, Ilkley, Burley and Menston - comprise 5.6% of the district population (Core Strategy settlements and sub areas combined) while these settlements have been assigned a combined housing target of 1600 dwellings or 3.8% of the district total. The Regional City of Bradford comprises 67.3% of the district's population and been assigned a housing target of 28,650 which is 68.1% of the district wide housing requirement.	467, 488
8. HO3 - There Is No Housing Need In Ilkley / The Need is in Bradford	4. The central thrust of the plan posits an extremely high number of greenbelt deletions and disproportionate development in affluent areas with low natural population growth while leaving the vast numbers of brownfield sites that are blighting Keighley and Bradford derelict and delivering insufficient housing in poorer areas with high population growth.	The Council have clearly set out the need for and justification for the release of green belt to meet the housing needs of its rapidly expanding population. The plan, as indicated in the above answer, is not proposing disproportionate amounts of development in affluent areas such as Wharfedale. Policy HO6 is seeking to prioritise the development of brownfield sites. The Allocations DPD will allocate and utilise all brown field sites which are shown to be deliverable or developable. However there are simply not enough of such sites to deliver 42,100 new homes.	488
8. HO3 - There Is No Housing Need In Ilkley / The	5. Strategy / Ilkley apportionment should properly assess local need.	The Council has indicated quite clearly that it considers that the most appropriate approach is to assess the district's overall need for new homes, and then to focus those homes	9, 10, 17, 18, 19, 20, 21, 23, 30, 31, 51, 59,

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Need is in Bradford		<p>where need is greatest given the key drivers of population growth and to distribute housing quantum in the most sustainable way possible given the evidence base.</p> <p>This means focusing most growth and development on the main urban areas and reflecting as far as possible the settlement hierarchy defined within Policy SC4. The settlement hierarchy itself reflects the size, function, role and relative sustainability of the different settlements and thus a settlement hierarchy based housing distribution will result in a broadly sustainable distribution.</p> <p>Housing targets have been compared and appraised against a range of criteria including land availability, deliverability, the need for affordable homes, housing waiting lists and over crowding, flood risk, impacts on key environmental assets such as the S Pennines SPA & SAC, and conservation areas.</p> <p>By contrast it is not clear what the objectors would consider to be a 'proper assessment of local need', how they would calculate that or what level of new homes – assuming they are prepared to accept any - they are advocating. Indeed, despite evidence of low levels of new supply over recent years, rising house prices and a significant affordability issues in the area, these objectors have failed to acknowledge that there is a need for new homes in the area at all, and have failed to appreciate the positive benefits that sensitively planned and designed new homes co-ordinated with new infrastructure could play in maintaining the vitality of the town.</p>	<p>67,72, 119, 133, 137, 155, 158, , 179, 311, 319, 341, 358, 377, 405, 454, 459, 460, 465, 466, 469, 470</p> <p>8, 12, 15, 48, 59, 67,67, 88, 92, 96, 115, 118, 119, 120, 122, 125, 131, 133, 137, 155, 158, 236, 294, 295, 301, 319, 334, 341, 352, 375, 449, 450, 454, 518</p>
8. HO3 - There Is No Housing Need In Ilkley / The Need is in Bradford	6. Housing need should be assessed via consultation with residents	The Core Strategy has seen several stages of consultation with extensive opportunities for comment and engagement.	11, 83
9. HO3 - Housing	1. A number of comments are made on the basis	The Council disagrees with the points made. There is a clear	116, 440, 488,

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Market Issues / Homes Will Be Meeting Need In Leeds	that Ilkley and Wharfedale are not argued to be part of the same market as Bradford, that there is no need at all for homes in Ilkley and that any homes provided in Ilkley will be providing for people outside of Bradford District such as in Leeds.	need for new homes within Wharfedale and no evidence is provided by these objectors to the contrary. Furthermore the Council's SHMA does not indicate that the Wharfedale area is a separate housing market from that of Bradford. There will always be a degree of movement across local authority 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	516
9. HO3 - Housing Market Issues / Homes Will Be Meeting Need In Leeds	2. The homes will be inaccessible to people from other parts of the District. The low incomes, unemployment and levels of deprivation there means that Bradford people would not be able to afford houses in Ilkley. The differential between property prices in other parts of Bradford and Wharfedale is such that 'trading up' from elsewhere in Bradford District to Wharfedale is rare.	The point is not relevant since the Council are not arguing that the housing targets in Wharfedale are predicated on people moving directly from the poorest areas of Bradford to Wharfedale. By providing new homes in areas across the district the Council will be creating much more flexibility in the total supply and stock of new homes and providing the opportunity for moves between and within areas.	104, 107, 122, 142, 144, 147, 180, 183, 211 488
9. HO3 - Housing Market Issues / Homes Will Be Meeting Need In Leeds	3. The homes will be inaccessible to people from other parts The Bradford 2010 SHMA Table 3.2 shows that Wharfedale has the highest percentage in the District of households moving in to the area from Leeds (15.9%) and elsewhere in England (7%) suggesting that local need is significantly lower.	Clearly the Wharfedale sub area as defined within the SHMA lies at the northern geographical extremity of the district and is well connected by road and rail to Leeds. The SHMA indicates that of the people who had moved house within the previous year, 64% were from within the district. Given the low levels of new housing supply being brought forward in the Ilkley area at the time and these geographical parameters the Council would suggest that this actually shows a surprising and quite high level of containment. It suggests that the majority of new homes built in the area would be taken up by people from within the district and the proportion would probably be even higher if the new homes which are built contain a significant proportion of affordable homes.	116
10. HO3 - Flood Risk and Drainage	1. Much of the proposed building would be in the flood plain. The scale of development and its effects do not	This is incorrect. The Council has followed the sequential approach to flood risk as advocated within the NPPF. Moreover the target of 800 new homes can be met entirely from sites within the EA lowest flood zone category 1.	440 120, 184, 213, 218, 224, 225,

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	adequately address the risks of flooding	Furthermore the SHLAA has assessed the potential land supply and screened out as unsuitable any sites which lie within flood zone 3b.	241, 242, 246, 251, 252, 279, 280, 292, 294, 295, 326, 325
10. HO3 - Flood Risk and Drainage	2. The drainage systems in the area would not be able to cope with all the development.	No evidence is provided to support these claims. This is a strategic plan. Detailed drainage issues will be assessed and dealt with at Allocations DPD stage or when planning applications are submitted.	25, 48, 246, 319, 320, 325, 472, 440
11. HO3 - Infrastructure	1. The plan is to build 1600 homes in Wharfedale, 800 of which in Ilkley with little plan to increase school places other than monitor the live birth rate (per the Local Infrastructure Plan (LIP)).The LIP states that the school places position in Wharfedale is already classed as CRITICAL.	The findings from the LIP indicate that the issue in relation to school places and investment for physical improvements to existing schools are apparent across all parts of the district including Wharfedale. Recent funding problems linked to the loss of Building Schools for the Future, compounded by major population growth (especially in the under 11 profile) means that there are a number of uncertainties surrounding future educational service provision across all parts of the district. Ensuring sufficient capacity will be one of the principal challenges for the district over the next 10 years. The Council's Children's Services have also produced an Education Organisation Plan (EOP), which considers the educational needs in Wharfedale in more detail. The outputs of the EOP have informed the LIP and will continue to inform the update or revision to the LIP.	490
12. HO3 - Other Ilkley Issues	1. Housing requirement for Ilkley based on uncertain assumptions for economic & population growth	The proposal for Ilkley is not a housing requirement it is a housing apportionment. The housing requirement is assessed objectively for the district. The Council is confident that its district wide housing requirement is based on robust evidence and, in line with Government Guidance, has utilised the latest ONS population projections. It has also taken account of the modelling outputs of the Yorkshire and Humber Regional Econometric Model.	2, 518
12. HO3 - Other Ilkley Issues	2. Building 800 houses in Ilkley is contrary to the principles for achieving sustainable growth in P1	The Council disagrees. The Government's presumption in favour of sustainable development and in turn the Council's	120, 169, 180, 358, 359

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		Core Strategy is predicated on the importance of meeting the housing and economic needs of the population. Sustainability has a number of different elements including social and economic. The proposals for Ilkley are modest, appropriate and will supports the town’s role as a Principal Town	
12. HO3 - Other Ilkley Issues	3. The vast majority of the policies, grouped within separate themes, are clearly laudable and can be readily supported, particularly when viewed in isolation or within their respective themed groupings. However, overall analysis of the full suite of policies in relation to the characteristics of Ilkley, lead us to question the veracity of an allocation of 800 new homes. If all policies are adhered to delivery could not be achieved.	The plans policies should not be read in isolation. Moreover there is no evidence or reason to suggest that the extremely modest apportionment of new homes in Ilkley cannot be accommodated.	74
12. HO3 - Other Ilkley Issues	4. The Council has failed to explore alternative approaches to housing development that might address the needs of the district’s population by increasing the number of genuinely affordable or social houses. Not even basic options such as relocating the ‘affordable’ element/quota from high value areas to areas of high need has been considered (or if it has it has not appeared in the Plan or underpinning documentation).	The housing targets for the settlements have not been derived by allocating an affordable housing element to each settlement. The plan must meet the housing needs of the district and it is not clear how this would be achieved by ignoring affordable housing need in Ilkley and instead increasing social housing elsewhere over and above what might be needed.	488
12. HO3 - Other Ilkley Issues	5. The scale of development will destroy the features that qualify Ben Rhydding Conservation Area (i.e. harm the setting of the Conservation Area)	Why? No justification is given for this statement. Moreover the Core Strategy is not allocating sites and it has yet to be determined which sites will be allocated for development and whether any will be located at Ben Rhydding.	183
12. HO3 - Other Ilkley Issues	6. There is no balance of land uses – only 5Ha employment land allocated.	No indication is given by the objector as to what they would take as balance and how this would be measured and why they think the balance is wrong. It is also unclear as to whether they are advocating the allocation of more employment land. It is therefore difficult to respond. The Council considers that 5ha of employment land does indeed represent an appropriate	516

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		balance given the size and function of the town. Employment land quantum has been divided up in roughly the same proportions as housing. So Wharfedale has been allocated approximately 3.8% of the district wide housing requirement and 3.7% of the district wide employment land requirement.	
12. HO3 - Other Ilkley Issues	7. The housing distribution for Wharfedale is not in balance with the employment distribution. Whereas the employment distribution to Wharfedale is 5ha or 3.7% of the district total, the housing quantum is 1600 which is higher at 3.8% This means an additional site or around 42 houses will need to be found in Wharfedale from within the green belt which could have been assigned to a brown field site elsewhere in the district. The Wharfedale target should therefore be reduced to 1550 to be in balance with the employment target.	The Council disagrees with the comment. The distribution is in the Council's view in balance. Even if the premise behind the comment is accepted – that balance has to be achieved at a degree finer than 0.1% - then the final allocation of both employment land and housing cannot always be in perfect balance as it has to also reflect a range of factors such as environmental considerations and land supply. The objector also makes the assumption that no additional site to meet the alleged 42 house gap can be found from within Ilkley and also makes the unsubstantiated assumption that there are additional brown field sites elsewhere that are left undeveloped All currently known and assessed to be deliverable brownfield sites have already been accounted for in the SHLAA land supply calculations. It is therefore more likely that any reduction in the Ilkley target would have to be met in the green belt around another settlement.	406
12. HO3 - Other Ilkley Issues	8. Objections are raised to the potential development of a number of potential housing sites including land at Ben Rhydding Drive / Wheatley Grove, land off the Countances Way. Comments relate to agricultural land value, flood risk, drainage, infrastructure and green belt loss.	The Core Strategy does not allocate sites. The sites mentioned lie within the SHLAA. The merits or otherwise of the Wheatley Grove and Countances Way sites will be assessed as part of the Allocations DPD. The assessments will be undertaken in line with the NPPF. This will include assessments, as appropriate of the impact on green belt, flood risk, and all other relevant matters.	440, 516
12. HO3 - Other Ilkley Issues	9. The plan is not consistent with sustainable development because it is not ensuring that sufficient land of the right type is available in the right place at the right time.	These comments are neither explained nor justified.	490
12. HO3 - Other	10. Full account not taken of market signals. A	To be clear Local Plans must provide for housing need and	27, 60, 73, 74,

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Ilkley Issues	large number of large developments in Ilkley have been stalled for some time (Clifton/Bolling Rd) so this may be a signal of over development already in the area.	not ignore that need simply because of temporary fluctuations in demand. The experience of Kirklees, whose Core Strategy was rejected and severely criticised for only seeking to meet part of the need for new homes illustrates this point. Furthermore care should be taken in interpreting such data and in confusing fluctuations in demand which are based on prevailing economic conditions, mortgage availability and costs and so on and long term housing need. Progress on sites can be halted for a number of reasons unrelated to need.	87, 91, 118, 125, 131, 133, 149, 155, 180, 184, 204, 217, 218, 225, 229, 230, 253, 254, 255, 257, 258, 259, 260, 261, 262, 263, 264, 265, 268, 270, 272, 291, 294, 295, 317, 363, 426, 453, 472, 516
12. HO3 - Other Ilkley Issues	11. The balance of the distribution should provide distribution more evenly with Menston, but with contributions from Addingham and Burley. Suggested Distribution: Addingham 250 Ilkley 525 Burley 250 Menston 525	The Council's proposed housing distribution within Wharfedale results from analysis of a whole series of criteria and information. It is not clear on what basis the objector's suggested alternative distribution has been formulated other than a desire to reduce the target in Ilkley. The objector's proposed distribution would be inherently unsustainable as it makes little reference to the settlement hierarchy and the size, role, function and services offered by each settlement and the available land supply.	406
12. HO3 - Other Ilkley Issues	12. 800 new homes in Ilkley will not prevent overcrowding in Bradford.	The 800 home target is not predicated on any assumption that it will contribute directly to reducing over crowding in Bradford.	2, 96, 159, 472, 518
12. HO3 - Other Ilkley Issues	13. There is a lot of potential in Ilkley on PDL sites which ought to reduce the apportionment as well as a lot of historic windfall development in the past. The impacts of this development and its impact on infrastructure is hidden and unaccounted for.	It is not clear what point is being made. The SHLAA indicates that there is some limited PDL opportunities within Ilkley. Site choices will be made in the Allocations DPD and the policies within this Core Strategy will mean that any genuinely available and deliverable or developable brown field sites will be given priority in meeting the proposed housing target. Infrastructure needs will be planned and provided for once there is greater certainty over both the scale and location of new development sites.	2, 7, 10, 12, 15, 18, 19, 20, 21, 23, 30, 31, 41, 46, 48, 67, 72, 87, 88, 92, 104, 107, 118, 119, 120, 131, 133, 137, 141, 145, 146, 148, 153, 154, 155, 158,

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			180, 183, 204, 217, 268, 301, 302, 304, 305, 306, 311, 319, 327, 334, 341, 352, 355, 367, 368, 370, 372, 374, 385, 403, 405, 449, 450, 454, 465, 466, 469, 470, 471, 480
12. HO3 - Other Ilkley Issues	14. The scale of development in Ilkley will impact on the wider natural environment outside the district (North Yorkshire)	The Council disagrees. No evidence or examples are given to justify such a sweeping assertion.	10, 15, 18, 19, 20, 21, 30, 31, 74, 18, 125, 131, 155, 180, 217, 449, 450, 465
12. HO3 - Other Ilkley Issues	15. The scale of development will severely compromise town of Ilkley and Ilkley Moor as a tourist attraction.	Why? No evidence or justification is given for this viewpoint.	27, 60, 73, 74, 87, 91, 118, 125, 131, 133, 149, 155, 180, 184, 204, 217, 218, 225, 229, 230, 253, 254, 255, 257, 258, 259, 260, 261, 262, 263, 264, 265, 268, 270, 272, 291, 294, 295, 317, 363, 426, 453, 472
Common Issues Raised For the Principal Towns			
1. HO3 - Green belt	1. A number of objections to the housing targets are made on green belt grounds, in particular that	The concerns regarding the potential loss of green belt land are acknowledged and understood. However the NPPF	116, 128, 152, 440, 490, 516

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	<p>the housing targets would require the use of green belt land which is argued to be contrary to the NPPF.</p> <p>It is also argued that there are no exceptional circumstances as required by the NPPF to use green belt. The Councils proposals are therefore not justified.</p> <p>Other arguments include that by proposing to build on green belt land the plan for Wharfedale is not positively prepared as it fails on the 3rd dimension of sustainable development per the National Planning Policy Framework - that of protecting and enhancing the natural environment.</p>	<p>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.</p> <p>Having established that there is a need for green belt deletions it is important to establish that there are opportunities for green belt release that would still retain an adequate and properly functioning green belt at both a local and strategic level and that the locations where such land releases might occur would offer sustainable development options.</p> <p>It is also important that any green belt releases that do occur are focused where possible 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>	
<p>1. HO3 - Green belt</p>	<p>2. The Green Belt in Wharfedale is argued to be an important part of the Green Infrastructure of the District as defined by Strategic Core Policy 6 (SC6).</p>	<p>Green belt designation is primarily aimed at preventing urban sprawl and avoiding the coalescence of settlements. Green belt is not defined on the basis of greenspace, habitats or general landscape quality</p>	<p>116</p>

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1. HO3 - Green belt	<p>3. Para 5.3.62 notes in relation to the housing allocation that, “the Bingley target has been set below both the baseline number and below the total capacity within the SHLAA. This is because the majority of the SHLAA capacity for Bingley is within the green belt and although Bingley is a sustainable location for growth there is also a need to ensure that the strategic functioning of the green belt in the area is not compromised.” It is difficult to understand why such conclusions are not also applied to Ilkley where the majority of the SHLAA capacity is also within the green belt and it is equally important to ensure that the strategic functioning of the green belt in the valley is not compromised.</p>	<p>Green belt separation is far more limited in a number of areas in Bingley area e.g. with Cottingley. Not the same at all. Large separation distances between Ilkley and surrounding settlements. Check growth study.</p>	490
1. HO3 - Green belt	<p>4. The scale of development in Ilkley is too high “development on green belt land will irreversibly alter the visual appeal of the Wharfe valley and be a major factor in bringing Ilkley and Burley closer together in contravention of the NPPF</p>	<p>The Council does not agree. Sensitively designed development need not have the effects claimed. Moreover there are no proposals within the Core Strategy which would even remotely lead to any coalescence between Ilkley and Burley.</p>	27, 118, 355, 453
1. HO3 - Green belt	<p>5. If the Ilkley target were reduced to 400 it could be accommodated without Green Belt releases.</p>	<p>Even if the target were reduced to 400 there would still be a need for green belt release not least because the Local Plan will also need to cater for infrastructure, schools and new employment land releases. Moreover nothing would be gained in green belt terms even if this were not the case – the plan is using up all of the deliverable land supply options in non green belt locations across the district thus a reduction in Ilkley’s target would simply increase green belt release elsewhere, possibly in less sustainable locations.</p>	74, 163
2. HO3 - Infrastructure	<p>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</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</p>	<p>Bingley Reps: 202, 483, 583 Ilkley Reps:</p>

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	<p>development. Concerns are expressed with regards to flooding, sewers, schools capacity, and capacity on the rail network, and particular concerns regarding congestion on key road links including the A65.</p>	<p>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 Local Infrastructure Plan to address these issues. It has consulted with utility providers as part of that work. The Local Infrastructure Plan indicates a number of challenges in accommodating future growth but does not indicate any major infrastructure issues which are not capable of resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.</p> <p>In the early stages of work on the Core Strategy the Council commissioned a Transport Study. Although looking at the district at a strategic level (housing quantum were based on wider sub areas rather than individual settlements), it did confirm that there was no option for distributing development across the district which performed significantly better others and that wherever housing growth was distributed there would be issues with regards to increased traffic flows and increased pressure on certain key areas, junctions and corridors.</p> <p>The study recommended that further more detailed corridor based studies were undertaken once there was more certainty over the proposed strategy for housing. Corridor based studies will therefore be produced as part of the work on the Allocations DPD and these will be focused on the areas of greatest concern. The studies will identify measures which will help manage, mitigate or reduce such capacity and congestion</p> <p>As part of its statutory duties the Council's Education Service</p>	<p>92, 116, 128, 156, 170, 178, 440, 442, 461, 467, 490, 516</p> <p>2, 7, 10, 12, 15, 18, 19, 20, 21, 23, 30, 31, 41, 46, 48, 67, 72, 87, 88, 92, 104, 107, 118, 119, 120, 131, 133, 137, 141, 145, 146, 148, 153, 154, 155, 158, 180, 183, 204, 217, 268, 301, 302, 304, 305, 306, 311, 319, 327, 334, 341, 352, 355, 367, 368, 370, 372, 374, 385, 403, 405, 449, 450, 454, 465, 466, 469, 470, 471, 480</p>
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		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>3. HO3 - The character of the area, landscape and wildlife.</p>	<p>1. A number of objections to the housing targets relate to concerns over the potential impact on the character of the area, on landscape and wildlife.</p> <p>With regards to Ilkley a number of objectors are concerned that the amount of development and loss of green belt would affect Ilkley’s intrinsic character which strategies elsewhere in the document serve to protect.</p> <p>The scale of development in Ilkley conflicts with the aims of this policy (WD1) and the Landscape Character SPD.</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 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 the adjoining South Pennine Moors SPA.</p>	<p>Bingley – 152</p> <p>Ilkley - 9, 12, 15, 18, 19, 20, 21, 23, 30, 31, 32, 35, 38, 39, 41, 46, 48, 60, 72, 73, 74, 87, 91, 93, 116, 120, 125, 131, 133, 149, 150, 155, 158, 169, 171, 177, 180, 183, 184, 204, 205, 218, 222, 223, 225, 235, 241, 244, 247, 251, 252, 257, 258, 259, 260, 261, 262, 263, 267, 272, 288, 293, 298, 304, 315, 317, 319, 320, 323, 324, 301, 303, 325, 328, 332, 343, 344, 346, 355, 363, 367, 383, 395, 401,</p>

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			404, 405, 427, 449, 450, 453, 471
4. HO3 - Vacant homes	<p>1. There are lots of vacant houses in Bingley – use those first</p> <p>Use should be made of vacant homes rather than building new homes in Ilkley. There are over 6000 empty properties in the district</p>	The Council is taking action to reduce the number of vacant homes, particularly long term vacants, and as a result of it proactive measures is already having success. It has a delivery strategy for making further progress. The CSPD has therefore already reduced the district wide housing requirement to account for a realistic and achievable reduction in the number of vacant homes. Without this allowance the housing targets in Bingley and Ilkley would have been even higher.	Bingley – 152 Ilkley – 92,440
5. HO3 - Agricultural land	1. Loss of good quality and productive agricultural land.	The Core Strategy is not allocating sites – this is a matter for the Allocations DPD. Within that document the site appraisal and selection process will be undertaken in line with the guidance within the NPPF, paragraph 112 of which states that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land.	Bingley – 503 Ilkley - 92
6. HO3 - Use Brownfield Sites	<p>1. A number of objections relate to the argument that brownfield sites in other areas such as Bradford and Keighley should be used and the Council has paid insufficient attention to doing this. It is argued as a result that the targets for Ilkley and Bingley be reduced.:</p> <p>There are lots of mill buildings – use them.</p>	<p>No evidence is provided for this assertion. The Council has produced a SHLAA which provides a robust indication of the available and potential land supply including the number of deliverable and developable brownfield sites in Bradford and Keighley (and in the rest of the district). The Council are proposing to utilise and where possible prioritise the development of these brownfield sites. However the quantum of deliverable and developable sites is not remotely sufficient to meet housing needs.</p> <p>Mill sites are being developed where they are available and deliverable and they will continue to make a contribution to supply in the future.</p> <p>Policy HO6 sets out the Council's policy to prioritise delivery on brown field land. The housing needs of the district cannot</p>	Ilkley 128, 440, 488, 516 Bingley - 152

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		however be met via the use of brown field sites alone. Moreover the status of a site as green field or previously developed is only one aspect of its overall sustainability.	
Objections to the Proposed Level of Development In Wharfedale			
HO3	1. Unclear and unjustified reduction of dwellings in Wharfedale.	The changes are neither unclear nor unjustified. The Core Strategy document and the Housing Background Paper clearly set out the reasons for the proposed reduction in the number of new homes compared to the CSFED. The other sections of this table also deal with the issues in relation to the specific settlements of Ilkley, Burley In Wharfedale, Menston and Addingham. A number of factors have led to the proposed lower targets including a small reduction in the overall district wide housing requirement, an increase in the district wide land supply in the second SHLAA and most significantly of all, a response to the HRA and the need to avoid and mitigate the direct and indirect effects of development on the S Pennines SPA and SAC and the 2.5km buffer zone around it.	437, 447
HO3	2. Higher housing provision figures are justified in Wharfedale particularly in Ilkley.	See above and elsewhere in this table	437, 447
HO3	3. Building 1600 new homes in Wharfedale is not sustainable and contrary to the NPPF	Building 1600 new homes in Wharfedale is sustainable and is in accordance with the NPPF. It is a modest and justified apportionment which reflects the evidence base.	7, 8, 10, 15, 18, 19, 20, 21, 30, 31, 41, 46, 119, 148, 155, 232, 449, 441, 450, 453, 454, 469, 470, 472, 473, 502
HO3	4. The Wharfedale apportionment is too high	The Council disagrees.	111
HO3	5. The proposed scale of development in Wharfedale is too high and contradicts the aims of WD1/E1	The Council disagrees. The Core Strategy proposes to apportion the overwhelming majority of district's new housing development (33,150 homes, 78.7%) to the Regional City and to the Principal Town of Keighley. Within Wharfedale the much lower distribution of just 1600 new homes (3.8%) is distributed according to the settlement hierarchy with the largest concentration on Ilkley which has the largest range of	74, 87, 116, 148, 159, 223, 305, 306

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		services and jobs. Contrary to the impressions given by local objectors there are a range of job opportunities within the valley and the settlements are well connected by road and by rail to a number of other major centres.	
HO3	6. The proposed development will lead to urbanisation, merging of settlements and ribbon development	There are no proposals which would even remotely indicate any chance of merging or coalescence of settlements within Wharfedale. The levels of development proposed are modest and perfectly capable, given sensitive design, landscaping and location to be absorbed without causing 'urbanisation'.	60, 73, 74 104, 107, 115, 143, 149, 153, 154, 169, 177, 184, 203, 204, 244, 252, 254, 257, 258, 259, 260, 261, 262, 292, 294, 295, 297, 304, 309, 315, 317, 319, 323, 324, 328, 360, 363, 385, 394, 401, 453, 472, 516
HO3	7. The Plan should be reviewed to take account of employment locations, access issues and environmental value	The plan's proposals are fully justified, based on extensive research and evidence and have taken into account the factors mentioned by the objectors.	25, 73, 74, 87
HO3	8. Housing development should be located around the M62 Corridor where employment and housing can be closer and not "build urban sprawl in an area of outstanding natural beauty" like in Wharfedale	The plan is proposing to concentrate the overwhelming majority of new homes (78.7%) in the main centres of Bradford and Keighley where the largest concentrations of employment are located.	119
Policy HO3 – Local Growth Centres - Silsden			
Support For The Silsden Target			
HO3	1. Countryside Properties are fully supportive of the housing distribution targets set for the borough of Bradford and the 1,000 identified as being required within the Silsden area.	Support noted and welcomed.	517
The Silsden Target Has Been Set Too Low			
1. HO3 - Silsden Bypass	1. Silsden should meet a higher target and should not be constrained by the need to deliver a Silsden	The Council has taken into account a wide range of factors in setting the target for Silsden. It is not clear either what target	435

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	bypass.	the objector is seeking or on what evidence or criteria they have used to reach the conclusion that the target has been set too low.	
2. HO3 - HRA	<p>1. Silsden is a sustainable location with good transport links and is therefore identified as a local growth centre. Yet its allocation has been reduced from 1700 to 1000. Silsden's allocation as a centre for growth should be given more weight than the 2.5km S Pennine Moors buffer zone. There is a surplus of 809 dwellings against the SHLAA. A large area of land to the east has been earmarked for development in previous plans. A proper appraisal of the buffer zone should be carried out.</p>	<p>The reasons for the reduction in the Silsden target relate to the need to reduce the potential impacts on the SPA and the key supporting areas within the 2.5km buffer zone. This is explained in the Council's updated Background Paper 1 issued at submission and in responses earlier in this table. Silsden's designation as a centre for growth cannot, as the objector suggests, override established law and guidance relating to this area of international wildlife importance. Development is not automatically ruled out on sites within the 2.5km buffer zone and although the housing target for Silsden has been reduced it will still require a significant though probably scaled back contribution from land to the east of the settlement. A proper appraisal of the buffer zone has been carried out - work underpinning the HRA, in particular survey work relating to both birds and supporting habitats illustrates this.</p>	439
The Silsden Target Has Been Set Too High			
1. HO3 - Comparison With Other Local Growth Centres	<p>1. It is proposed in the draft document that Silsden, as a "Local Growth Centre", accommodates an additional 1700 houses. The increase would therefore be 56% of existing housing as against an average of 37% for all "Local Growth Centres</p>	<p>This is incorrect. The Core Strategy does not suggest that Silsden accommodates an additional 1700 homes, the figure is 1000. The Council suggests that any approach which seeks to allocate housing growth based purely on equalizing percentage housing stock increase on a settlement by settlement basis is flawed because it is failing to account of a range of critical factors such as the size, function and role of the settlement, land supply and environmental factors.</p> <p>For accuracy - as at April 2013 the Council's council tax data indicates that there are approximately 3515 dwellings within the Core Strategy defined settlement of Silsden. 1000 new homes would therefore indicate an increase of 28.49%. The equivalent figures for all local growth centres are 3,400 new homes, April 2013 housing stock of 11,790, and thus an</p>	68

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		increase of stock of 29.1%. Based on this it can be seen that both that the objector's figures are wrong and that the percentage increase for Silsden is fractionally lower than the average for the Local Growth Centres as a whole.	
2. HO3 - No housing need in Silsden	1. The SHMA and AHEVA present scant evidence of substantial housing need in the area – there is little need for land release in Silsden.	The SHMA and AHEVA do not assess or recommend what the housing targets should be for each settlement. The SHMA merely assesses the level of affordable housing need.	68
2. HO3 - No housing need in Silsden	2. Building large numbers of homes in the town would not address the need for affordable housing in the District. It would deliver housing at the wrong price in the wrong place	The Council disagrees. The proposals would represent a modest but sustainable contribution to meeting the district's housing needs. It would also meet the need for affordable homes in the town.	68
3. HO3 - Need is in Bradford not Silsden	1. For the LDF to be sustainable, houses required for Bradford should be provided within the city or its environs rather than over provision at the geographic extreme of the district	The Council is already focusing the majority of new housing in and around Bradford (68%) with just 2.4% in Silsden. However it would be incorrect to imply that the only place where there is any need for new housing over the next 15 years is in Bradford.	68
4. HO3 - HRA / SPA	1. SPA - The Town Council welcome and support the changes made due to the habitat policies for the South Pennine Moors causing the reduction from 1700 houses to 1000 but feel that it does not go far enough.	The Core Strategy must bring forward proposals to meet the districts needs for new housing in a way which will not adversely affect the ecological integrity of areas such as the S Pennines SPA and SAC and the Habitat Regulations Reports have guided the development of a suite of policies and proposals to ensure that this is the case. The CSPD has reduced the levels of development in the most sensitive areas, most notably the settlements within Wharfedale, including Silsden and included proposals which allow for management and mitigation of any impacts of new development. No indication is given by the objector as to why they think the reduction in target is not enough, what evidence they have based this on and what level of reduction they propose.	68
5. HO3 - Employment	1. Without the expansion of local employment opportunities it is likely that significant housing development will necessitate increasing commuting.	The Local plan will also include proposals and site allocations to increase employment opportunities in both Silsden itself and in other settlements accessible to it.	68
6. HO3 - Green Belt	1. Using green belt - impact and risks to the wider property market across Bradford and risks to the	The Core Strategy's proposed target for Silsden of 1000 new homes would not necessitate any green belt land releases	68

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	economic wellbeing of Leeds, Bradford and the Leeds City Region.	around the settlement. There is no reason why carefully planned and located green belt releases in sustainable locations within the district need adversely affect the property market and well being of Bradford and Leeds, particularly as the plans of these two authorities also envisage regeneration and the use of brown field sites where viable. In fact the opposite is true. The property market and well being of Bradford would be undermined by not providing sufficient new homes to accommodate its growing population.	
7. HO3 - Infrastructure	1. Concerns over schools places.	<p>The Council understands the concerns that are raised with regards to the capacity of services and infrastructure, including schools capacity. However these issues are not unique to single areas such as Silsden and will be an issue more or less wherever the new homes are allocated.</p> <p>The district's population is growing and will continue to do so and therefore infrastructure and services will need investment and improvement across the district. The Council has produced an Local Infrastructure Plan to address these issues. It has consulted with utility providers as part of that work. The Local Infrastructure Plan indicates a number of challenges in accommodating future growth but does not indicate any major infrastructure issues which are not capable of resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.</p>	68
8. HO3 - The character of the area, landscape and wildlife.	1. Concerns over impact on the character of the area, 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 the careful selection of sites and sympathetic and high quality design can avoid or mitigate such impacts. In the case of the Silsden, the housing target has been substantially reduced in the Publication Draft document as compared to the CSFED, in part as a result of the evidence of potential; impacts on the South Pennine	68

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		Moors SPA.	
9. HO3 - Vacant homes	1. It would appear the figures do not take full account of the empty housing stock.	The Council is taking action to reduce the number of vacant homes, particularly long term vacants, and as a result of it proactive measures is already having success. It has a delivery strategy for making further progress. The CSPD has therefore already reduced the district wide housing requirement to account for a realistic and achievable reduction in the number of vacant homes. Without this allowance the housing target in Silsden would have been even higher.	68
10. HO3 - Agricultural land	1. Loss of good quality and productive agricultural land.	The Core Strategy is not allocating sites – this is a matter for the Allocations DPD. Within that document the site appraisal and selection process will be undertaken in line with the guidance within the NPPF, paragraph 112 of which states that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land.	68
11. HO3 - Use Brownfield Sites	1. Brownfield sites in other areas such as Bradford and Keighley should be used.	<p>The Council has produced a SHLAA which provides a robust indication of the available and potential land supply including the number of deliverable and developable brownfield sites in Bradford and Keighley (and in the rest of the district). The Council are proposing to utilise and where possible prioritise the development of these brownfield sites. However the quantum of deliverable and developable sites is not remotely sufficient to meet housing needs.</p> <p>Policy HO6 sets out the Council's policy to prioritise delivery on brown field land. The housing needs of the district cannot however be met via the use of brown field sites alone. Moreover the status of a site as green field or previously developed is only one aspect of its overall sustainability.</p> <p>The housing proposals reflect and fully utilise all known and assessed to be deliverable and developable previously developed sites. Government policy means that no account can be taken of sites – whether green or brown – if they</p>	68

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		cannot be shown to be deliverable and developable.	
	Policy HO3 – Local Growth Centres – Steeton With Eastburn		
	The Steeton Target Has Been Set Too Low		
1. HO3 - Settlement Hierarchy	1. In line with the work done by Johnson Brook, the target for Steeton with Eastburn should be increased to 1,500 dwellings which will support its role and function in the settlement hierarchy as a sustainable settlement which can accommodate growth.	The proposed target of 1500 would be unsuitable given the size and nature of the settlement, and would not be sustainable. The proposed CSPD target of 700 homes is already significantly above the baseline population proportionate target of 346. The objector's proposal would represent a 83% increase in the existing housing stock within Steeton of 1802 (Council tax data April 2013) – much higher than all other Local Growth Centres some of which have a greater range of existing services, employment opportunities and infrastructure. Moreover the land supply indicates that such a target would not be deliverable. The SHLAA Update indicates a supply of just 885 units. The settlement is effectively constrained from expansion to the north due to the presence of the functional flood plain.	397
1. HO3 - Settlement Hierarchy	2. The proposed distribution of housing is unsound as the proposed approach cannot be justified given evidence relating to land constraints in some settlements in the first two tiers of the settlement hierarchy and the ability of settlements in the Wharfedale area to accommodate a higher level of growth than is proposed.	The CSPD's proposed distribution is both sound and is justified by the evidence base. Land supply is sufficient to meet the targets within first 2 tiers of the settlement hierarchy. Further land supply is available in certain areas such as Bradford City Centre over and above the SHLAA Update quantum and this is addressed elsewhere in this document. It is already proposed that Wharfedale accommodates significant growth and increasing this further would not be sustainable or justified either in relation to the main focus of future population growth and therefore need which is in the main urban areas and not Wharfedale or in relation to the potential impacts on the S Pennines SPA / SAC.	397
	Policy HO3 - Target For The Local Service Centres - Addingham		
	The Addingham Target Has Been Set Too Low		
1. HO3 - Higher Target	1. Our work at Addingham justifies a higher level of local housing provision coupled with green	The Council considers that the housing target for Addingham is a reasonable and justified one which reflects the nature and	447

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	infrastructure and habitat enhancement and limited adjustments to the Green Belt boundary.	location of the settlement, its position within the settlement hierarchy and environmental considerations such as the need to reduce or avoid direct and indirect affects on the SPA / SAC.	
2. HO3 - The Population Proportionate Target	1. The target for Addingham should be set in line with the population based distribution in table HO3. This is justified because each of the settlements listed is sustainable in relation to its own current population. Providing additional housing to each settlement in a pro rata quantity as in table HO3 will maintain that level of sustainability in each settlement.	The Council disagrees. The proposed target for Addingham is justified in relation to the evidence base and the HRA. Table HO3 provides a baseline but should not be used on its own to determine the final target since it takes no account of the critical range of factors including land supply and environmental impacts. The justification for setting a slightly lower target for Addingham when compared to the population proportionate baseline of 263 is explained in the Core Strategy and the Housing Background Paper.	166, 167, 168
3. HO3 - HRA	1. It appears that the primary evidence for making the reductions to development in Wharfedale is based upon the impact of Special Protection Areas ('SPA') and Special Areas of Conservation ('SAC') in relation to settlements in the District. The approach taken and outlined in the Council's Habitats Regulation Assessment is to create a 2.5km buffer zone around the SCA/SPA boundary, which in turn has informed Policy HO3. This is unjustified constraint on growth in these areas where there is a clear local need for housing.	The conclusions of the HRA, and the suggestion of a 2.5km buffer zone were key consideration in the reduction of the housing targets within Wharfedale although they were less of an issue specifically for Addingham. The Council considers the approach taken to minimising and mitigating potential impacts on the SPA and SAC are reasonable and justified. However it is important to stress that the HRA conclusions were not the only criteria in the adjustments made to the housing targets between the CDFED and the CSPD. For example the overall district wide housing requirement within the CSPD is slightly lower than that within the CSFED. Thus even if no other factors were relevant and the same proportionate distribution was followed then the target for Addingham would have been reduced from 400 to 370. Moreover the targets issued to the smaller settlements – in particular but not exclusively the Local Growth Centres – were raised above what they would otherwise have been in the CSFED because of constraints in supply within other settlements, most notably the Regional City. At the CSPD stage the land supply, as indicated by the updated SHLAA,	437

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		<p>was significantly greater in most parts of the district including the main urban areas which are the main focus of both population growth and therefore housing need within the district. This therefore allowed for the option of reducing the level of growth allocated to the smaller settlements if necessary.</p> <p>Finally Addingham lies within the bottom tier of the settlement hierarchy and although the Council accepts that some development will be needed to maintain and support the settlement, significant growth in these settlements would not be sustainable and in comparative terms would provide a less sustainable option than maintaining a focus on the larger higher tier settlements.</p>	
3. HO3 - HRA	<p>2. It is noted that the buffer incorporates all SHLAA sites within Addingham and if applied as an exclusion zone would remove all development opportunities. This is clearly not the purpose of the buffer zone, as demonstrated by the proposed 200 new homes. Given the 200 homes proposed and the acknowledgement that the buffer zone does not preclude development in its entirety it does not provide any tangible evidence to support a 50% reduction from 400 to 200 homes within Addingham</p>	<p>The approach clearly set out within the Core Strategy and informed by both the HRA and the comments of Natural England are that the Core Strategy should adopt a precautionary approach which reduces both direct and indirect effects on the SPA and the supporting areas within the 2.5km buffer zone and includes management and mitigation measures. Even if this were not the case there is no clear justification for assigning significantly more growth to Addingham and the objector provides no evidence of local need which would remain unmet if the 200 home target were maintained..</p>	437
3. HO3 - HRA	<p>3. The Council needs to ensure a better balance is struck between meeting the identified future needs for housing in Wharfedale and Airedale and adequately protecting the SPA and SACs that fall within the District boundaries. As it currently stands, this balance is not achieved and the imposition of a such a wide buffer zone is flawed in itself and will have the effect of constraining housing supply and investment in key areas of the District with the effect of producing an unbalanced</p>	<p>The Council does not agree with the objector’s main assertion that an incorrect and imbalanced approach has been taken between development within Wharfedale and protection of the SPA / SAC.</p> <p>The objector does not indicate what they think such a balance would be and how they come to such a conclusion other than presumably a desire to see more land allocated within or adjoining Addingham. They fail to indicate what they assess to be local housing need and how they have derived this.</p>	437

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	and unsustainable local housing market in areas of Airedale and Wharfedale.		
4. HO3 - Disproportionate reduction	1. The settlements in Wharfedale, such as Addingham, have been disproportionately reduced in their delivery levels, despite no evidence of a lesser housing need.	<p>First of all when quite small numbers are being quoted, percentage reductions give a false impression and are largely meaningless.</p> <p>Secondly the circumstances behind each target are set out in the Housing Background Paper. The resulting targets within the CSPD are considered justified and sound.</p> <p>Thirdly the objector would surely appreciate that the reductions for each settlement are not going to be of the same proportion because the circumstances within each area are different. The CSPD would have been rightly considered unsound if each settlement target had been reduced by the same proportion regardless of the updated evidence base.</p> <p>It is important to stress that a demand for housing is not the same as a local need for housing. The Council notes that although reference is made to local need the objector has made no assessment or provided evidence of what figure they are proposing would represent local need.</p> <p>The figures in the objector's table are also wrong. The target at CSFED as reflected in CSFED Policy HO3 was 45,500 not 48,481. The district wide reduction was therefore 7.5% not 14%</p>	437
The Addingham Target Is Too High			
1. HO3 - Unclear How the Target Has Been Calculated	1. Unclear how the housing apportionment for Addingham was calculated	The approach to determining the housing targets and the evidence on which it was based is clearly set out within the Core Strategy (paragraphs 5.3.39 to 5.3.64) and the Housing Background Paper.	189, 437, 464
2. HO3 - Local Need	2. How has Bradford arrived at the "local need" figure of 200 houses for Addingham.	The housing target of 200 dwellings reflects the distribution approach as set out within both the Core Strategy and Housing Background Paper. It is not a specific calculation of	179

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		local need within the village.	
2. HO3 - Local Need	3. Addingham apportionment should reflect local need.	With just 200 new homes being planned for over 17 years therefore at a rate of just 17/year it unlikely that such an apportionment will be doing much more than meeting local need.	51, 63, 83, 111, 132, 178, 213, 468
2. HO3 - Local Need	4. Development should be small scale and organic. Not another large and beautiful field system obliterated by hundreds of homes.	The Core Strategy does not allocate sites. There is no reason why the objectors suggestion of small scale and organic development cannot be achieved, however the form of development and site distribution will be for the Allocations DPD to determine.	111, 226
2. HO3 - Local Need	5. 200 is too high for Addingham	It is not clear why the objectors think that 200 new homes is too high. This is a modest number of homes to be achieved over a 17 year period and which will support and maintain the village's vitality and provide affordable homes. It can be delivered in relation to the available land supply and without need to alter the green belt. The total has been halved since the CSFED. The new proposed total of 200 lies below the population proportionate target which would be 263. 200 new homes represents just 0.5% of the district wide housing requirement. This is a reasonable and justified proposal.	175, 213
Policy HO3 - Target For The Local Service Centres - Baildon			
The Baildon Target Is Too High			
1. HO3 - Baildon Is Not Part of the Regional City	1. Baildon should not be classified as part of the Regional City. The housing development is not being spread evenly across the district but disproportionately (68%) concentrated in the Regional City. As a result of this Baildon is being asked to take more than its fair share of development.	<p>This is incorrect. Baildon is not classed as part of the Regional City within the Core Strategy and has not been given a disproportionately high housing target. Moreover neither has the Regional City been given a disproportionately high target.</p> <p>Baildon is classified within the Core Strategy as a Local Service Centre and therefore within tier 4 of the settlement hierarchy. This together with a lack of potential land supply are among the reasons why the proposed housing target for Baildon is so low and significantly below the baseline population proportionate target. The population proportionate target for Baildon would have been 1,351 whereas the proposed CSPD target is only 450.</p>	393

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2. HO3 - Meeting the needs of Leeds not Bradford	1. The proposed housing development in Baildon will have little effect in meeting Bradford's housing needs – it will be meeting the needs of Leeds	The Council disagrees with this statement. No evidence is given to substantiate it.	172, 361
3. HO3 - Conservation area / heritage impact	<p>1. We have concerns about the levels of housing growth proposed in Baildon due to the potential impact which this might have upon the historic environment.</p> <p>At present, the plan fails to demonstrate that the scale of housing proposed is consistent with its Policies for safeguarding the significance of its heritage assets or with the requirements set out in NPPF Paragraph 126 to set out a positive strategy for the conservation of the historic environment.</p>	<p>The Council accepts and appreciates the need to ensure that the proposed development quantum does not undermine key heritage assets including the Saltaire World Heritage Site. It also accepts that one way to demonstrate that the Core Strategy's proposed housing targets would not undermine these assets is to show that the land capacity exists to meet the proposed quantum without having to allocate the sites which would be most likely to detract significantly from those assets.</p> <p>The Council has determined that such an assessment would provide more reliable and up to date results if based on the land supply within the third SHLAA rather than SHLAA 2 which was available at the time of consultation on the CSPD.</p> <p>Therefore in parallel with the new SHLAA update, the Council has assessed each site within / adjoining the settlement and categorised it according to whether there are no expected impacts, potential impacts which could be mitigated or impacts which have a reasonable likelihood of rendering that site inappropriate for development.</p> <p>The Council will be calculating a revised and discounted total settlement capacity which excludes these most sensitive sites.</p> <p>Preliminary results suggest that an adjustment may not be needed to the Baildon target. SHLAA capacity for Baildon currently stands at around 855 units and this includes 1 new site which have been identified as a result of the Bradford Growth Assessment. Around 425 units <u>may</u> need discounting from this total as a result of heritage impacts. This would leave a capacity of around 430 units which lies just below the Core</p>	103

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		<p>Strategy Publication draft target of 450.</p> <p>It must be stressed that these results are provisional. The site appraisals which in turn produce settlement capacity quantums are currently being reviewed and consulted upon with the SHLAA Working Group and the Working group's comments could affect both individual site appraisals and the resultant settlement capacities. The Council will therefore present the final results to the EIP. It is therefore possible that no change will be needed to the Baildon target on these grounds and even if a small change was necessary it would not significantly alter the overall strategic approach to housing distribution within the plan.</p> <p>In the event that minor amendments to the Baildon target are required, these can be considered by the EIP in the context of other representations made and the options for making minor adjustments upwards in other settlements.</p>	
4. HO3 - PDL	<p>1. Baildon's target should be reduced because it cannot meet the target of 55% PDL for the Regional City as set out in Policy HO6.</p>	<p>The Council does not agree and the objection contains both errors of fact and interpretation.. Baildon is not classified as being within the Regional City, it is classified as a Local Service Centre. The PDL target for the group of Local Service Centres is 35%. Moreover the PDL targets set out in Policy HO6 relate to the collection of settlements within that tier as whole. There is no requirement for each settlement within the tier to meet the overall target. This is explained within paragraph 5.3.90 of the CSPD.</p>	393
5. HO3 - Otley Road Pinch Point	<p>1. A number of respondents raise the issue of problems with traffic congestion at what is claimed to be a pinch point at Otley Road. It is suggested that Baildon should be considered a special case as there is only local and suitable bridging point which is used by traffic travelling from the east towards Bradford, via Otley Road or Baildon Road, in</p>	<p>There is no reason why Baildon should be regarded as a special case. The level of population growth which Bradford is experiencing and thus the level of development required to accommodate this population will create the need for investment in a number of areas across the district. Detailed proposals for infrastructure improvements will be developed as part of the Local Plan process.</p>	212, 361, 393

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	addition to the movement of its own substantial population.	The delivery of a Shipley Eastern Relief Road, which will address the concern raised, has been identified as a Strategic Transport Infrastructure Priority for the Council and as such opportunities to access funding to deliver such a scheme will continue to be sought. The delivery of this scheme, however, is not considered a pre requisite for further development in Baildon given its relatively limited scale	
6. HO3 - Shipley Eastern Link Road	1. Road improvements such as the Shipley Eastern Link Road need putting in place first before any new housing development is allowed	<p>Proposed major improvements to the network are set out in the Local Infrastructure Plan. The Leeds City Region Strategic Economic Plan (SEP), West Yorkshire Plus Transport Fund (WY+TF) and West Yorkshire Local Transport Plan (LTP) set out programmes of strategic and local transport improvements which will support growth and development.</p> <p>The Council has confidence that any future capacity issues arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>The delivery of a Shipley Eastern Relief Road, which will address the concern raised, has been identified as a Strategic Transport Infrastructure Priority for the Council and as such opportunities to access funding to deliver such a scheme will continue to be sought. The delivery of this scheme, however, is not considered a pre requisite for further development in Baildon given its relatively limited scale</p>	212, 361, 393
7. HO3 - Public transport issues	1. Although the Council's traffic plans rely increasingly on the use of public transport, Baildon is not well served. The majority of the available land in Baildon (including green belt) is remote from the railway station and the existing bus routes. The frequency of the hourly bus service has just been reduced. The railway is single track and the station platform only four carriages long. This will severely	<p>TR1 sets out the broad principles to achieve a framework for development across the District and is compliant with National Planning Policy Guidance.</p> <p>The Transport Study provides an outline of the impact on the road network and public transport network. This will inform further work as part of the allocations process.</p>	393

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	limit any attempts to increase capacity.	<p>The proposals of the emerging Core Strategy have informed LCR and West Yorkshire Combined Authority (WYCA) work on the Strategic Economic Plan and West Yorkshire Plus Transport Fund.</p> <p>Ongoing discussions are being held with Network Rail and WYCA regarding the development strategy and future impacts on the rail network.</p> <p>The Council continues to work with WYCA and bus operators to identify options for improving bus connections – in some cases increased development facilitates the provision of new and improved services</p> <p>The Council has confidence that any future capacity issues for both road and rail, arising from development proposals contained within the Plan can be dealt with using a variety of mitigation measures.</p> <p>The Core Strategy will be used to inform infrastructure partners longer terms investment decisions</p>	
Policy HO3 - Target For The Local Service Centres – Burley In Wharfedale			
The Burley In Wharfedale Target Has Been Set Too Low			
1. HO3 - Downgrading to Local Service Centre	1. As set out in detail in relation to Policy SC4 we do not consider the downgrading of Burley in Wharfedale to a Local Service Centre and the resultant reduction in the quantum of housing development proposed from 500 dwellings to 200 dwellings cannot be justified and is not supported by the Council's evidence base.	<p>The downgrading of Burley In Wharfedale has not resulted in the reduction in the housing target – it is the other way around.</p> <p>Paragraph 3.59 of the CSPD states that the third tier of the settlement hierarchy – that of Local Growth Centres – was created for two reasons. Firstly in recognition that there are significant differences in the settlements in what would otherwise be the lowest tier with some offering more sustainable options for growth because of their role, services and location and secondly because of the land supply</p>	397, 402, 495

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		<p>constraints in the upper two tiers. The latter of these two justifications is arguably slightly less of a factor now due to the increase in land supply across the district between the first SHLAA and the SHLAA update.</p> <p>It is however acknowledged that Burley In Wharfedale would be a relatively sustainable location for some housing growth if other factors suggested that growth in the area would be an appropriate option.</p> <p>However the Council are required to propose a strategy for meeting housing need which would be acceptable in terms of the potential direct and indirect impacts on the S Pennines SPA & SAC. The Council were therefore justified in looking to reduce the scale of growth within the 2.5km buffer zone within which Burley is located. As a result of the reduction in the housing target for Burley, the Council considers that it cannot be identified as a growth area in Policy HO2 and should not be designated as a Local Growth Centre in Policy SC5</p> <p>In conclusion the reduction in the proposed housing target for Burley is justified and is supported by the evidence base. A combination of factors including the HRA, the reduced district wide housing target since the CSFED, the revised land supply position within the SHLAA and the greater capacity within the main urban areas have in combination led to the conclusion that a higher target and the designation of Burley as a growth centre would not be the most sustainable option for meeting the district’s overall housing needs.</p> <p>Furthermore the combination of factors described above means that even if Burley had remained in the third tier of the settlement hierarchy a lower housing target would still have be justified.</p>	
2. HO3 - No	1. The Council does not provide specific evidence	While the baseline population proportionate target for Burley	397, 402, 495

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justification for the low target	which justifies the low proportion of housing now proposed in this sustainable settlement and there is no evidence the settlement could not deliver the 500 dwellings previously proposed. In seeking to deliver such a low proportion of development in this settlement will result in a plan that is not effective, as it will result in too few homes being delivered in a sustainable settlement that has capacity for growth.	would be 518 this is only a reference point and this does not mean that a target around 500 dwellings would be the most sustainable option for meeting housing need. Similarly just because the land supply exists to support a higher target does not make such a target appropriate given the context of the need to preserve the ecological integrity of the SPA/SAC and the need to take a precautionary approach to development within the 2.5km buffer zone which plays a key role in supporting SPA species.	
3. HO3 - Alternative Distribution	<p>1. As referred to in detail in the Johnson Brook representations, the proposed distribution of housing is unsound as the proposed approach cannot be justified given evidence relating to land constraints in some settlements at the top of the settlement hierarchy and the ability of settlements in the Wharfedale area to accommodate a higher level of growth than is proposed.</p> <p>The distribution proposed by Johnson Brook still results in the primacy of development in high tier settlements, but distributes development to support the delivery of sites in the early part of the plan period. The distribution proposed therefore ensures the delivery of the objectively assessed need for housing while remaining in proportion with each settlement's position within the settlement hierarchy.</p> <p>To be sound, Burley in Wharfedale should be identified as a Local Growth Centre and the proportion of dwellings proposed in the settlement increased to 500 dwellings, as set out in the Further Engagement Draft</p>	<p>The Council disagrees with the objector and suggests that the Burley target is both justified and sound. It also suggests that the analysis of the objector which suggest land supply constraints in other higher order settlements is incorrect.</p> <p>The distribution proposed by Johnson Brook is inappropriate as it is based on a flawed assumption that the district wide housing requirement should be increased by some 4-5,000 units, pays insufficient attention in some cases to land supply constraints, and could lead to an adverse impact on the ecological integrity of the S Pennines SPA and SAC.</p> <p>The Council disagrees for the reasons set out above.</p>	397, 402
4. HO3 - HRA	1. There are significant and fundamental issues	The Council refers to the responses provided to similar issues	495

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Criticisms	with the HRA assessment such that the revised Habitats Regulation Assessment is neither sound, nor legally compliant. It follows, therefore, that the very restrictive mitigation measures applied to the settlement hierarchy, and distribution of development proposed in Policy HO3, is neither justified nor proportionate, and that there is no sound basis on which to discount the apportionment of housing requirement to be accommodated within Burley in Wharfedale.	earlier in this table and to the updated Background Paper 1 issued at submission.	
5. HO3 - Land Supply / SHLAA	<p>1. Land supply – the SHLAA indicates that there is land available to accommodate over 1000 new dwellings within or adjoining Burley over the plan period.</p> <p>While some sites within the green belt to the south and east may be deemed unsuitable due to potential coalescence between Burley and Menston, land to the west of Burley in Wharfedale is capable of delivering at least 500 units without undermining the Green Belt’s strategic function.</p>	There is clearly land available to deliver a housing target well in excess of the proposed figure of 200. However it should be noted that virtually all of this potential lies within the green belt not within the settlement itself. Moreover the Council are required to propose a strategy for meeting the districts housing needs which reflects the pattern of key environmental constraints such as the potential impacts on the ecological integrity of the S Pennine SPA / SAC. Thus the existence of such a potential land supply does not in itself mean that a higher housing target would be either appropriate or the most sustainable option.	495
5. HO3 - Land Supply / SHLAA	<p>2. The 2013 SHLAA indicates that there are parts of the City (notably within the City Centre and Bradford SE) where the intended allocation outstrips available supply.</p>	This is incorrect. There is sufficient capacity to deliver the targets as set out in the CSPD.	495
6. HO3 - Bradford Growth Assessment	<p>1. The entirety of Burley in Wharfedale is identified within the Growth Study as falling within the 2.5km ‘buffer zone’ around the South Pennine Moors SAC/SPA within which development is intended to be restricted on the basis of Policy SC8. On this basis, land is identified as being ‘constrained’.</p> <p>In light of the critique of the Habitats Regulation Assessment provided in Appendix 3 it is considered that the Growth Study, as drafted, should be given</p>	<p>This is incorrect. The Growth Study’s methodology for identifying strategic parcels as potential growth areas did not exclude areas within the 2.5km SPA buffer zone.</p> <p>The relevant section of the Growth Assessment Report is pages 9 and 10. The table here notes’ “The Draft Habitat Regulations Assessment of the Core Strategy identified a 2.5km buffer around the SAC/SPA as the main area within which supporting habitat is utilised by the birds. The Council have commissioned surveys to better</p>	495

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	<p>limited weight in determination of the overall housing distribution across the district.</p>	<p>understand the role of this zone in supporting SPA bird species and this data will be used to inform the most appropriate policy approach to development in such areas. It will help to determine the extent, if at all, to which development might be capable of being accommodated within parts of the buffer area. <u>As this assessment is currently ongoing, this constraint has been included within the medium category but has not been used to rule out areas from appraisal as part of Element Two.</u>” (Bold and underline, our emphasis).</p>	
<p>7. HO3 - Flood Risk</p>	<p>1. It is a requirement of NPPF to avoid development within the areas of highest flood risk, and adopt a sequential approach to direct development to areas of lowest flood risk.</p> <p>However, as clearly set out within paragraph 5.3.55 of the CSPD, the housing numbers currently proposed within Policy HO3 will necessitate the development of land in flood zone 2 and 3a in Bradford City Centre and the Shipley Canal Road Corridor.</p> <p>The main justification provided for this is the outcome of revised Habitats Regulation Assessment, with paragraph 5.3.56 stating that “With significant areas of the district effectively ruled out for accommodating significant additional development due to the impacts on the internationally important S Pennine Moors SAC / SPA, the only remaining alternative would be to allocate additional development to other parts of the regional city”, and in this case to areas of high flood risk.</p>	<p>Firstly the NPPF requires the LPA to take a sequential approach to steering new development away from areas at highest risk of flooding which the Council has been done in the case of the CSPD. The NPPF does not, as the objector will know, rule out development in higher risk areas.</p> <p>The text of paragraph 5.3.66 is also being misrepresented. The text at no point states that if the HRA constraints did not exist then the targets within the City Centre and Canal Rd would be reduced with resulting increases in Wharfedale. The text is merely reflecting that if all sites in the City Centre and Canal Rd within the higher risk flood zones were discounted from the available land supply then there would be a shortfall which would have to be accommodated elsewhere and among the options available, placing that shortfall within other settlements within Wharfedale, is an option ruled out due to the potential impacts on the S Pennines SPA. This is not the same as saying that the option of placing that deficit within Wharfedale would be the most appropriate option – clearly it would not.</p> <p>The text also points out that another option is to increase green belt releases in peripheral locations around Bradford but that this would be a far less sustainable approach than</p>	<p>495</p>

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		<p>retaining the sites in the higher flood risk areas and thus securing regeneration in the central locations of the City Centre and Canal Rd.</p> <p>The Council therefore suggests that the real choices are between a larger green belt release around Bradford or development within the City Centre and Canal Rd with some sites as necessary being brought forward with management and mitigation via the two AAP's and the phase 2 SFRA.</p>	
<p>8. HO3 - Market Signals</p>	<p>1. Market signals and other indicators of demand are a critically important reality check and NPPF para 17 states,</p> <p>“Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.”</p> <p>In the absence of such a market signals assessment in the Core Strategy the objectors have carried out such an assessment for Wharfedale – this suggests that the approach recommended within draft Policy HO3 (and subsequently Policy WD1) will fail to meet local housing needs within Wharfedale on the basis of a number of key market signals including, inter alia, high house prices and affordability ratios; low levels of historic delivery; and high levels of under occupancy. These issues can only be addressed through the provision of</p>	<p>First of all the Council considers that the main thrust of the specified part of NPPF para 17 applies to the district wide objectively assessed need. There is no NPPF based requirement to subject every settlement or sub area to an objective assessment of need incorporating market indicators of the sort of assessment carried out by NLP.</p> <p>Secondly the Council would point out that the district wide Housing Requirement Study (HRS), to which the NPPF paragraph does apply, does indeed include the required analysis. Section 3 of the February 2013 HRS report sets out the main housing market drivers in the district while section 4 assesses the main housing market indicators including completions, housing stock change, transaction levels, house prices and affordability. Moreover the SHMA reports of 2010 and the update of 2013 include detailed sub area analysis. It is therefore incorrect to state that the Core Strategy has not been informed by an analysis of market signals.</p> <p>Thirdly the Council consider that some of the most important market signals such as housing waiting lists and overcrowding actually indicate that unmet housing need is most acute in the regional city while affordability is a far bigger issue in the city (in terms of quantum of affordable homes needed – see SHMA update) than in the outer areas such as Wharfedale.</p>	<p>495</p>

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	<p>additional housing within this part of the district, thereby allowing local housing needs within Wharfedale to be adequately met.</p>	<p>Fourthly it is pointed out that care should be taken – whether it be by the Council or the objector – in trying to interpret market signals data. Such data provides useful but indirect and contextual information and there is no easy way to actually convert or quantify these indicators into an actual housing need number.</p> <p>Finally it is also pointed out that care is also needed to ensure that contextual data is measuring actual need rather than demand.</p> <p>The Council concludes that market signals have been incorporated into the evidence base which has informed the policies and proposals of the Core Strategy. The work produced by the objector does provide useful contextual information of the situation within Wharfedale but it is far from conclusive as to whether the indicators used are measuring need as opposed to demand and the extent to which such indicators are the result of other factors and not just past and current housing supply. The evidence does not therefore provide a compelling reason to increase housing targets within Wharfedale particularly given the results of the HRA.</p>	
8. HO3 - Market Signals	<p>2. The Market Signals Report included at Appendix 2 identifies Wharfedale as comprising the most viable area for housing development within Bradford. Increasing the proportion of housing development within Burley in Wharfedale therefore provides the opportunity to deliver a greater proportion of the SHMA target of 587 net new affordable houses per annum. This is an important consideration which should be included as part of the ‘reality checking’ undertaken to inform the distribution of housing growth.</p>	<p>As indicated on at page 168 / para 5.3.58 of the Core Strategy, the delivery of affordable housing was a reality checking factor included in the distribution process. However as paragraph 5.3.58 points out : “While greater quantum of affordable housing could theoretically be secured by a distribution weighted more towards the settlements of Wharfedale, such an approach would not reflect the distribution of need for such affordable housing which according to the updated SHMA is concentrated more in the urban areas of the district.”</p>	495
	<p>The Burley In Wharfedale Target Is Too High</p>		
1. HO3 -	<p>1. Under no circumstances should green belt</p>	<p>The Core Strategy does not allocate sites. However it must be</p>	445

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Coalescence of settlements	releases lead to the joining up of separate communities: our particular concern is the narrow green corridor between Burley in Wharfedale and Menston. .	stressed that none of the proposed housing targets, including that in Burley In Wharfedale, would necessitate or require the joining up or coalescence of settlements.	
2. HO3 - Employment Opportunities	1. Housing growth should not only be based on regional and district requirements but also on local needs and be supported by the expansions of small business and other local employment opportunities.	The comments are noted. The housing distribution proposed within the CSFED reflects the concentrations of existing employment opportunities across the district. The CSFED also proposed the release of land to provide for further employment and this includes a 5ha allocation within Wharfedale.	445
2. HO3 - Employment Opportunities	2. Para 3.74 warns against unbalanced development with 'over heating' of already successful areas. We would argue that the current proposals for Burley are in danger of doing this.	The Council disagrees. The housing proposed for Burley of just 200 new homes over the 17 year plan period are modest and would not have any of these effects.	445
Policy HO3 - Target For The Local Service Centres – Cullingworth			
Support for the target			
	1. We encourage the increased housing distribution to the settlement of Cullingworth since the Further Engagement Core Strategy Draft (October 2011), from 200 to 350 dwellings. The 2010 Strategic Housing Market Assessment identifies a housing need within Cullingworth, particularly in order to meet the shortfall in affordable housing within the housing market area. The proposed level of development to Cullingworth will go some way to meet the areas housing need while providing the investment opportunities to improve local services and facilities. Our client's Barratt and David Wilson Homes and GMV Thirteen Ltd find the amount of housing distributed to the settlement of Cullingworth as both reasonable and deliverable.	The comments and the support for the proposed housing target for Cullingworth are noted and welcomed.	446
Policy HO3 - Target For The Local Service Centres – Haworth			
1. HO3 - Target Should Be A	1. We concur that Haworth should accommodate 500 new houses over the plan period but this	The Council disagrees. In places such as Haworth the need to provide for new homes has to be balanced with the need to	108

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Minimum	should be a minimum given the points previously raised above in regard to the anomalies in the calculation and approach in Tables HO1 and HO2. Not consistent with national policy, not justified, not sound.	respond appropriately and sensitively to the environmental context. As the representations made by English Heritage to the Haworth housing target illustrate, the Core Strategy needs to provide clarity and confidence as to both the level of new homes being planned and that those homes can be accommodated without adversely affecting the historic environment and setting of the village. Such confidence and certainty would be lost if the target were expressed a minimum. The comments made in relation to tables HO1 and HO2 are flawed and incorrect.	
The Haworth Target Is Too High			
1. HO3 - Heritage Impacts	We have set out in our response to Sub Area Policy PN1 A (in respect of Haworth) our concerns about the levels of housing growth proposed in these areas and the potential impact which this might have upon the historic environment. At present, the plan fails to demonstrate that the scale of housing proposed for these areas is consistent with its Policies for safeguarding the significance of its heritage assets or with the requirements set out in NPPF Paragraph 126 to set out a positive strategy for the conservation of the historic environment.	The Council accepts and appreciates the need to ensure that the proposed development quantum do not undermine key heritage assets. It also accepts that one way to demonstrate that the Core Strategy's proposed housing targets would not undermine these assets is to show that the land capacity exists to meet the proposed quantum without having to allocate the sites which would be most likely to detract significantly from those assets. The Council has determined that such an assessment would provide more reliable and up to date results if based on the land supply within the third SHLAA rather than SHLAA 2 which was available at the time of consultation on the CSPD. Therefore in parallel with the new SHLAA update, the Council has assessed each site within the settlement and categorised it according to whether there are no expected impacts, potential impacts which could be mitigated or impacts which have a reasonable likelihood of rendering that site inappropriate for development. The Council will be calculating a revised and discounted total	103

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		<p>settlement capacity which excludes these most sensitive sites.</p> <p>Preliminary results suggest that an adjustment is unlikely to be needed to the Haworth target. SHLAA capacity for Haworth currently stands at around 1,050 units and this includes 2 new sites which have been identified as a result of the Bradford Growth Assessment. Around 350 units <u>may</u> need discounting from this total as a result of impacts on the conservation area. However this would still leave sites capable of accommodating around 710 units which provided a significant buffer over the CSPD Haworth target of 500 units.</p> <p>It must be stressed that these results are provisional. The site appraisals which in turn produce settlement capacity quantum are currently being reviewed and consulted upon with the SHLAA Working Group and the Working group's comments could affect both individual site appraisals and the resultant settlement capacities. The Council will therefore present the final results to the EIP. It is therefore likely that no change will be needed to the Haworth target on these grounds and even if a small change was necessary it would not significantly alter the overall strategic approach to housing distribution within the plan.</p> <p>In the event that minor amendments to the Haworth target are required, these can be considered by the EIP in the context of other representations made and the options for making minor adjustments upwards in other settlements.</p>	
2. HO3 - Landscape & Topography	1. Concerns are expressed about the potential impact on the landscape setting of the settlement.	The Council does not consider that there is any landscape related reason to lower the Haworth target. Each potential housing site will be assessed in terms of its impacts as part of the work on the Allocations DPD and this will include a landscape appraisal. There is no reason to suggest in the case of Haworth, given the limited nature of the proposed development, that the site selection process at Allocations	103

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		DPD stage and sensitive design will not avoid or mitigate significant landscape impact.	
2. HO3 - Landscape & Topography	2. Para 5.3.36 – this paragraph suggests landscape and topographic constraints mean limited growth for Haworth yet as already identified in the Strategic Core policies Haworth is identified as a LSC and additionally is one of the City Council’s main tourist destinations suited to accommodating 500 new dwellings over the plan period.	It is unclear what point the objector is trying to make. There is no inconsistency in the CSPD. Haworth is designated as a Local Service Centre which is the lowest tier of the settlement hierarchy and the housing target has been set accordingly and in relation to a range of evidence including potential land supply and environmental constraints.	108
Policy HO3 - Target For The Local Service Centres –Menston			
Support for the Target			
1. HO3 – Support target for Menston	1. We support the level of housing growth (400) identified for Menston as a Local Service Centre behind the principal town of Ilkley. This policy highlights the importance of Menston in contributing to the Wharfedale sub areas housing need, particularly given the cautious growth approach adopted for Ilkley, as the principal town given the Council’s desire to direct growth away from sensitive designated areas.	Support noted.	415
The Menston Target Is Too High			
1. HO3 – The Menston target is too high	1. No account taken for the 600+ housing development at High Royds within the Leeds area boundary.	This is incorrect. There is no reason why Menston cannot and should not accommodate the very modest apportionment of just 400 new homes just because of other developments in the area. The development at High Royds falls within the Leeds Local Authority area and are contributing to the meeting of Leeds’s own requirement for new homes. The Council has taken into account all key strategic cross boundary issues in discussion with its partner authorities in the Leeds City Region. The Council will continue to consult with and work with adjoining authorities as it prepares its new local plan. Its plans and proposals, including any necessary service and infrastructure improvements, will take full account of current and planned developments across LA boundaries.	25

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1. HO3 – The Menston target is too high	2. The general population of Menston is declining.	The population of Menston, as defined by the Core Strategy has seen a v small drop between the 2001 and 2011 census. However if anything this shows how little new development the village has seen in recent years, how insufficient housing choices at the right price are available to those young people who want to purchase a home and remain in the area. It demonstrates the need for a modest level of development and this is exactly what is proposed within the Core Strategy.	25
Policy HO3 - Target For The Local Service Centres - Wilsden			
The Wilsden Target is too high			
1. HO3 – The Wilsden target is too high	1. Wilsden has already seen a 15% increase in dwellings over the last 10 years – significantly higher than across the rest of the district. (and has largely retained its village character by a focus on PDL and infill). A further increase of 200 dwellings is unsustainable.	While Wilsden has seen some development in the recent past this cannot be a prime criteria for the Council's future housing distribution strategy as there is no indication that Wilsden cannot or shouldn't accommodate a very modest proportion of the district's future housing needs. Wilsden is being asked to accommodate just 200 new homes over the 17 year plan period which represents just 0.48% of the district wide housing requirement.	79
1. HO3 – The Wilsden target is too high	2. There is contradiction in allocating housing to the South Pennine Villages which are the lowest hierarchy and (5.3.56) remote from the areas of greatest need and hence least suitable.	The Council disagrees. The distribution of new homes to meet the district wide requirement reflects the settlement hierarchy along with a range of other factors as set out in the Housing Background Paper.	79
Common Issues Raised For the Local Service Centres			
1. HO3 – Green Belt	1. A number of objections to the housing targets are made on green belt grounds,	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	Baildon – 393 Burley – 445 Oakworth – 117 Oxenhope – 117 Wilsden - 79

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		<p>deletions it is important to establish that there are opportunities for green belt release that would still retain an adequate and properly functioning green belt at both a local and strategic level and that the locations where such land releases might occur would offer sustainable development options.</p> <p>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>	
2. HO3 – Infrastructure	<p>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. Particular concerns are expressed with regards to schools capacity, and congestion on key road links.</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 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 Local Infrastructure Plan to address these issues. It has consulted with utility providers as part of that work. The Local Infrastructure Plan indicates a number of challenges in accommodating future growth but does not indicate any major infrastructure issues which are not capable of resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.</p>	<p>Baildon - 1, 4, 172, 212, 361, 393</p> <p>Burley – 445</p> <p>Oxenhope - 117</p> <p>Menston – 70. 71</p> <p>Baildon - 172, 212</p>

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		<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 (housing quantum were based on wider sub areas rather than individual settlements), it did confirm that there was no option for distributing development across the district which performed significantly better others and that wherever housing growth was distributed there would be issues with regards to increased traffic flows and increased pressure on certain key areas, junctions and corridors.</p> <p>The study recommended that further more detailed corridor based studies were undertaken once there was more certainty over the proposed strategy for housing. Corridor based studies will therefore be produced as part of the work on the Allocations DPD and these will be focused on the areas of greatest concern. The studies will identify measures which will help manage, mitigate or reduce such capacity and congestion</p> <p>As part of its statutory duties the Council's Education Service will continue to plan for future educational service needs and the Council's new statutory development plan, by providing more certainty over the levels of growth planned in each area, will actually assist it in both the planning process and its ability to bid for funding</p>	
<p>3. HO3 – The character of the area, landscape and wildlife.</p>	<p>1. A number of objections to the housing targets relate to concerns over the potential impact on the character of the area, 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 the careful selection of sites and sympathetic and high quality design can avoid or mitigate such impacts. In the case of the Local Service Centres, many of the targets have been slightly reduced in the Publication Draft document as compared to the CSFED. In the case of Burley, the target has been significantly reduced in part as a result of the evidence of potential impacts on the</p>	<p>Burley - 445</p>

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		adjoining South Pennine Moors SPA.	
POLICY HO4 – PHASING THE RELEASE OF HOUSING SITES			
HO4	Support for the policy		
HO4	<p>1. Network Rail consider that phasing / programme for the new housing would be useful to help inform our Route Studies and plan timely transport infrastructure interventions</p>	Support noted.	14
HO4	<p>2. Yorkshire Water strongly supports Policy HO4, particularly with regard to Part C 4 and 6. It concurs with the principle of the phasing of new housing, placing “a focus on the early release of deliverable and sustainable sites which are not dependent on significant new infrastructure and will place a focus ensuring that the timing of both housing and infrastructure are aligned” (para. 5.3.68).</p> <p>Para 5.3.69 of the plan notes that the use of phasing policies will lead to some sites being held back until the second half of the Plan period. We agree with this principle but it should be noted that phasing may be required not just with respect to the overall housing delivery strategy but also to large individual sites, particularly in the north and northwest of the district where waste water infrastructure is at capacity in places. The approach will contribute significantly to flood risk mitigation and protection of water quality.</p>	The Council agrees with the comments made. Support noted.	123
HO4	<p>3. Yorkshire Greenspace Alliance strongly support Policy HO4 on the basis that a clear phasing mechanism is absolutely critical to the effectiveness and soundness of the plan.</p> <p>1) It enables the local authority to focus</p>	Comments are noted.	394

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	development on the available sites that are most suited to implementing spatial objectives; 2) It enables the local authority to allocate development sites that are less suited to the spatial objectives on the basis that they need only be released for development if the more suitable sites are becoming fully developed; 3) It avoids development being spread thinly across too many sites at any given time, such that provision of infrastructure and amenities can be better delivered and more suitable sites are delivered more quickly; 4) It enables the overall supply of housing land to be monitored and managed effectively to adjust for changes in the market and to bring forward alternative sites (e.g. windfall sites) that offer better sustainability than some of the later phase allocated sites.		
HO4	4. BRAiD strongly supports the need for phasing and sees this as absolutely essential if the developers are to be kept under control.	Support noted.	393
HO4	5. The flexibility to provide by a phased approach to development as suggested in Policy HO4 is also welcomed especially in light of the prevailing uncertain economic conditions	The comments are noted.	510
HO4	6. Agree with the need to meet targets for development on brownfield land.	The comments are noted.	507
HO4	7. Support for emphasis on village growth being smaller scale developments meeting local needs and slower paced delivery	The comments are noted.	111
Objections to Policy HO4			
1. HO4 - NPPF Does Not Advocate /	1. Several objections are made on the basis that the NPPF does not specifically require or advocate that Local Plans should include a phasing policy.	Just because the NPPF does not specifically state that Local Plan should include a particular policy approach such as phasing, this does not mean that a LPA cannot adopt such an	129, 105, 444, 512

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Mention Phasing	<p>The HBF suggest that the NPPF does not provide any justification towards phasing.</p> <p>It is suggested that the Council’s proposal to phase the release of sites has the potential to constrain the development of deliverable sites.</p>	<p>approach.</p> <p>The key therefore is whether the phasing policy accords with the general principles and goals of the NPPF – the Council consider it does. The proposed policy would actually support and not hinder delivery and growth, would secure sustainable development, and foster strategic working with utility companies and statutory consultees in line with principles of the duty to co-operate.</p>	
1. HO4 - NPPF Does Not Advocate / Mention Phasing	2. It could undermine the requirement for a 5 year land supply	By incorporating an 8 year initial phase, the policy has been written and designed to ensure that the supply is front loaded, to ensure early delivery, to ensure a 5 year land supply. The text of the policy also makes clear the need to ensure that there is a range and choice of sites. The supporting text makes it clear that the policy does not prevent any particular type of site being placed within the first phase of land release.	
1. HO4 - NPPF Does Not Advocate / Mention Phasing	3. As the Council suggest in the supporting text to the policy that there would be no bar on a particular type of site being placed within the first phase, it is maintained the delivery of sites is best considered on a site by site basis, rather than arbitrarily splitting the allocations into two phases which may result in otherwise deliverable sites being unnecessarily held back from being developed.	The plan sets out the criteria by which sites would be phased – in no way is this an ‘arbitrary process’.	396, 397, 400, 402, 447
2. HO4 - Would Fail to Boost Housing Supply	1. The phasing policy is contrary to the requirement within the NPPF paragraph 47 to significantly boost the supply of housing. It is contrary to the principle that Plans should be positively prepared. It could undermine the 5 year land supply.	The objectors fails to identify why the phasing policy proposed would prevent housing delivery being boosted. Housing delivery in recent years has averaged around 700 units per annum. Even with a phasing policy, 8 years housing land will be released at day one of the plan with no restrictions on the pace at which that that supply is brought forward. This would allow for development rates way in excess of both what has recently been delivered and in excess of the average 2,200	423, 435, 437, 444

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		<p>per annum housing target.</p> <p>The key issue is not whether a particular housing site is released straight away or held back to a later date but whether the Council's plans are ensuring that the district's need for new homes can be met. The total housing requirement reflects household growth which will occur year on year as the plan period progresses. Clearly the full housing requirement and thus full land supply is not needed on day one of the Plan period.</p> <p>Finally though the Council considers that Policy HO4 would in no way undermine housing delivery it must be pointed out that a positively prepared plan is not just, as the objectors appear to believe, measured by the number of homes delivered. Positive preparation means ensuring that development and growth is planned and delivered in a sustainable way and reflects and aligns with infrastructure planning and supports regeneration.</p>	
3. HO4 - 5 Year Land Supply	<p>1. Policy HO4 is unsound as its inclusion could result in a plan which is ineffective in delivering the quantum of housing to meet the objectively assessed needs for the District as it could unnecessarily hold back deliverable sites whilst in contrast there may be sites in the first phase which are not deliverable in the first half of the plan period</p>	<p>This is incorrect. The plan would not be frustrating the delivery of the required quantum of new homes to meet need. The plan would be releasing more than half the land supply immediately. The whole of the land supply is not needed on day one of the new plan. The second point is also unjustified. The criteria for allocating land within the 2 proposed phases includes reference to the need maintain a 5 year land supply therefore there would be no undeliverable sites within the first phase. At any future EIP into the Allocations DPD it would be open to anyone to make representations to see sites swapped or changed if they felt a given site was no deliverable within the first phase and substitute it for an alternative site.</p>	396, 397, 400, 402
3. HO4 - 5 Year Land Supply	<p>2. The policy would conflict with the requirement to maintain a 5 year land supply of deliverable sites and would not rectify the current deficiency in the supply.</p>	<p>This is a unjustified narrative which shows that the objectors have ignored important criteria within the Policy. Firstly the policy is in no way seeking to promote sites which are unviable or undeliverable, nor is the policy solely aimed at</p>	105, 129, 423, 444, 495

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	<p>This is particularly as the Council are seeking the phasing requirement to promote sites in regeneration areas and on previously developed land which are likely to have significant economic viability issues</p>	<p>promoting particular types of sites or sites in specific areas. If the objector were to actually read policy criteria C1, C2, and C3 this would be self evident.</p> <p>While the Council will be attempting to encourage and prioritise sites which would help secure regeneration it is a fundamental requirement that all sites which are proposed for allocation within the Local Plan are deliverable in the short term or developable in the medium to longer term. If a site is found not to be developable at all it will not be allocated in the Local Plan. If a site is developable but cannot be brought forward in the first phase of the plan period then it will not be placed in the first phase i.e. it will only be considered for allocation in the second phase.</p> <p>There are a number of measures within the policy to ensure both that a 5 year land supply is maintained and that additional supply capable of addressing current deficiency can be met.</p> <p>Firstly the supply is heavily front loaded. Under the phasing policy proposed, 8/15 of the land supply to meet 42,100 new homes would be made immediately available – this amounts to capacity for 22,453 homes. This would be well in excess of the 5 year requirement.</p> <p>To indicate the scale of flexibility, the calculated 5 year land supply requirement in the SHLAA update was 18,241. This was made up of a basic 5 year requirement of 13,500 plus 4,741 for past under delivery. Thus this figure included in full, in line with the Sedgefield approach, the previous under delivery. No objections were made by the SHLAA Working group to this calculated figure.</p> <p>A Core Strategy first phase land release for 22,453 new</p>	
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		<p>homes would therefore represent a flexibility surplus of 66% if based on the basic 5 year requirement or 23% surplus based on the overall 5 year requirement.</p> <p>Secondly, the Council would point to the heavy emphasis on ensuring overall delivery and maintaining a 5 year land supply within the criteria that Policy HO4 proposes to guide the placement of sites within the two phases.</p> <p>Criteria C/2 indicates that the allocation of sites within the phases must reflect the need to maintain a 5 year land supply and this is one of the reasons why the supporting text also states clearly that there is no bar to any particular type of site being placed in first phase. These points are further underlined by criteria C/3 which emphasises the need to provide a range and choice of dwellings in each phase.</p> <p>There is therefore no reason to suggest that the phasing policy will have the effect claimed. Within the Allocations DPD it will be open for anyone to argue that the placement of sites within the phases should be altered to ensure a 5 year land supply.</p>	
<p>4. HO4 - Phasing Policies Have Caused Under Delivery In the Past</p>	<p>1. This type of managed (phased) release policies were used in the production of the reviews of the West Yorkshire authorities UDP's and they proved to be a prime contributor to under-delivery against annual housing requirement targets.</p>	<p>There is no evidence that the phased approach to land release was a key factor which resulted in under delivery in Bradford. The single biggest factor has been the state of the economy and the housing market.</p> <p>The RUDP was adopted in 2005 and the phase 2 housing sites were released in the second half of 2008. Delivery during the period in which phase 2 sites were held back was actually in excess of the annual housing delivery targets applicable.</p> <p>Delivery against target went into the red after the phase 2 housing sites were released. There was no significant take up of phase 2 housing sites in the years following their release.</p>	<p>447</p>

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		<p>Total delivery was 188 above target in the period were phase 1 sites were held back and delivery was 8991 below target in the 5 years following phase 2 site release. Even if the development plan housing target had stayed at the same level of 1560 / year, performance would still have gone from over delivery to under delivery.</p> <p>All this points to the economy and housing market being the key drivers affecting rates of delivery not the Bradford RUDP phasing policy. Delivery was no more held back by the phasing policy before 2008 than it was boosted by the release post 2008.</p> <p>.Delivery vs target was as flows:</p> <table border="1" data-bbox="1088 743 1839 1166"> <thead> <tr> <th>YEAR</th> <th>TARGET</th> <th>DELIVERY</th> <th>DIFFERENCE</th> </tr> </thead> <tbody> <tr> <td>2004/5</td> <td>1560</td> <td>1361</td> <td>- 199</td> </tr> <tr> <td>2005/6</td> <td>1560</td> <td>1369</td> <td>- 191</td> </tr> <tr> <td>2006/7</td> <td>1560</td> <td>1578</td> <td>+ 18</td> </tr> <tr> <td>2007/8</td> <td>1560</td> <td>2156</td> <td>+ 596</td> </tr> <tr> <td colspan="4">Phase 2 sites released 2008</td> </tr> <tr> <td>2008/9</td> <td>2700</td> <td>1440</td> <td>- 1260</td> </tr> <tr> <td>2009/10</td> <td>2700</td> <td>999</td> <td>- 1701</td> </tr> <tr> <td>2010/11</td> <td>2700</td> <td>696</td> <td>- 2004</td> </tr> <tr> <td>2011/12</td> <td>2700</td> <td>733</td> <td>- 1967</td> </tr> <tr> <td>2012/13</td> <td>2700</td> <td>721</td> <td>- 1979</td> </tr> </tbody> </table> <p>Source : Targets – Yorks & Humber RSS / Net Completions – Bradford AMR</p>	YEAR	TARGET	DELIVERY	DIFFERENCE	2004/5	1560	1361	- 199	2005/6	1560	1369	- 191	2006/7	1560	1578	+ 18	2007/8	1560	2156	+ 596	Phase 2 sites released 2008				2008/9	2700	1440	- 1260	2009/10	2700	999	- 1701	2010/11	2700	696	- 2004	2011/12	2700	733	- 1967	2012/13	2700	721	- 1979	
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5. HO4 - CIL	1. The Council also seek to justify constraining the release of housing sites to allow infrastructure to come forward to support development, however with the inevitable	The is a simplistic and incorrect argument. There will be some occasions where the delivery of infrastructure is dependent on national and regional investment decisions and programmes. It would be foolish to rely solely, as the objector implies, on	423, 444																																												

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	introduction of the Community Infrastructure Levy (CIL) and the continuing use of S106 contributions (be it individual or pooled contributions) it should be possible to deliver the necessary infrastructure alongside the delivery of any housing development without the need to constrain housing delivery.	the possible future introduction of CIL. It ignores the fact that CIL has to be tied to viability levels and if introduced by the Council CIL contributions are likely to be limited and oversubscribed.	
6. HO4 - Other Plans and EIP's have Rejected Phasing Policies	<p>1. Objectors claim that phasing policies have been rejected by Inspectors dealing with the Leeds and Rotherham Plans.</p> <p>In the case of Leeds' Core Strategy, the Inspector rejected a similar phasing arrangement and in his Main Modifications has advised Leeds City Council to move away from a policy which restricts house building earlier on in the plan period.</p> <p>Reference is also made to the South Worcestershire Local Plan.</p>	Care should be taken in drawing direct parallels between plans as the policies and the evidence will vary in each case. The Council considers that its phasing policy is fully justified. It should also be pointed out that in actual fact the Leeds Core Strategy EIP has not, as claimed, rejected the Leeds phasing policy .	105, 444
6. HO4 - Other Plans and EIP's have Rejected Phasing Policies	<p>2. The phasing policy is contrary to the recent Hunston case in which Sir David Keane noted that the correct approach is to first identify the objectively assessed need and then to consider whether that need is consistent with the policies set out in the framework. It is not appropriate to introduce phasing policies which are determined by the extent to which supply can come forward. Such an approach flies in the face of the Hunston Judgement.</p>	It is unclear how the judgement as expressed by the objector is relevant to the phasing policy in Bradford's Core Strategy. The judgement as described relates to the objective assessment of need and the decision on then whether that need can be provided for. The Council has both objectively assessed the need for new homes and then adopted that quantum in its Core Strategy. The phasing approach does not conflict with this principle unless the objector is making the ridiculous assertion that the district's population requires all 42,00 new homes on day one of the plan period.	435, 437
7. HO4 Criterion C/4 - PDL	<p>1. Whilst the NPPF (paragraph 111) enables the Council to set a target for previously developed land this must be based upon evidence including deliverability of such sites. The NPPG is also clear that whilst previously developed land is sometimes desirable to deliver the local authority</p>	It is not clear what this has to do with the phasing policy particularly as the policy and supporting text make it clear that phasing will not be based on a site's previously developed status alone. The wording and supporting text makes clear that there will be no bar on any type of site being placed within the first phase and that in each phase sites will need to deliver	105

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	must have regard to their deliverability and the risks this will pose to the delivery of the whole plan.	a range and choice of house types, sizes and tenures to meet local need. The reference to meeting PDL targets will not impair delivery - sites will be drawn from the SHLAA which has already assessed the deliverability of sites and the Allocations DPD and the site selection process within it will also be subject to viability and deliverability assessments. The PDL targets reflect the SHLAA evidence.	
7. HO4 Criterion C/4	2. The PDL targets should be seen as a whole plan requirements and not a year on year target as this will simply stall sustainable and viable developments from coming forward. The impact of this will be to thwart the Council's attempts of achieving a 5 year housing land supply.	Criterion 4 indicates that phasing of sites will be based on "The need to meet the targets for development on brownfield land as set out in this document". It is incorrect to imply that the policy requires the PDL target to be met on a year by year basis. PDL targets are to be met over the plan period as whole.	105
7. HO4 Criterion C/4	3. Some sites will have long gestation and delivery periods which necessitates their early release to ensure full delivery outcomes within the plan period.	If this is the case then there is nothing within the policy which prevents their placement within phase 1.	447
7. HO4 Criterion C/4	4. The policy should also tackle the thorny issue of brown field sites standing fallow and prevent green fields being developed while brown field sites are untouched.	The approach to previously developed land is a matter covered in Policy HO6 and in any case the approach proposed would be in conflict with the NPPF and would frustrate the provision of new homes.	342
8. HO4 - Cross boundary infrastructure	1. In the Wharfedale area we do not see how the current core policy is sound, particularly in relation to adjoining areas and more specifically Aireborough. We see development in both areas in isolation from each other. We do not think this is compliant, sound or that there is sufficient evidence within the core strategy to demonstrate a duty of care between Bradford and Leeds District Councils.	Policy HO4 allows for a phased release of sites with one of the criteria being infrastructure. There is nothing in the policy which prevents that phasing to be based on infrastructure issues beyond and cross boundary – assessment of which will in nay case take place under the duty to co-operate.	70, 71
9. HO4 - NPPF timescales	1. A second matter of question on this policy is the mismatch to NPPF timeframes. Generally NPPF identifies three 5 year time periods (0-5; 6-10; 11-15 years) yet this policy proposes 2 phases one of 8	The Council disagrees. The quoted NPPF text is not relevant to the specific matter of phasing. It is instead related to the choice between preparing a plan which only seeks to identify specific sites for delivery over 10 years and preparing a plan	108

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	years and the other of 7 years.	with 15 years of site allocations. The objector will note that the Council are proposing to plan positively to allocate sites for the full 15 years.	
10. HO4 - Objection to the detail of the policy	1. In order to ensure its soundness, Policy HO4 should remove reference to the two distinct phases, and instead apply a flexible approach to promote sustainable patterns of development whilst retaining a five year supply of housing land in those areas of demand to ensure that objectively assessed housing needs can be delivered when and where they are needed.	It is difficult to understand this suggestion as the removal of the 2 phases would mean that the policy was not a phasing policy anymore.	495
11. HO4 - Trigger Mechanisms	1. The policy does not specify the trigger mechanisms but devolves this to the subsequent plans. This is considered inappropriate.	The Council disagrees.	129
12. HO4 - Infrastructure should be delivered before housing	1. No new housing should be allowed before the necessary infrastructure is in place or existing infrastructure deficiencies are remedied. Para 6 should be amended to include "the timing of new development can only proceed when new infrastructure is in place to avoid unacceptable pressure on both community and strategic infrastructure".	Such an approach would be impracticable, would frustrate and would be contrary to the NPPF. In most cases new local infrastructure such as schools provision will have to be planned and provided in tandem with the new development	135, 342

POLICY HO5 – DENSITY OF HOUSING SCHEMES

	Support for the policy		
HO5	1. Policy HO5 as presently drafted requiring developers to make the best and most efficient use of land is supported by CEG Land Promotions Ltd, as is the recognition that density targets must related to individual sites and their surroundings in order to achieve a workable and sustainable layout, as well as local circumstances including the type	The comments are noted.	495

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	and size of housing required to meet local needs and market demand. This approach is largely in accordance with paragraph 47 of NPPF.		
HO5	2. Support the average density of 30dph minimum and that developers should make best and most efficient use of land to ensure sustainable development and growth	Support is noted.	108
HO5	3. We welcome the need for densities to take account of their surroundings and those areas where local character would warrant lower densities. This will ensure that the densities of new residential developments reflect the character of the area in which they are located.	Support noted and welcomed.	103
Objections to the policy			
1. HO5 - The Policy should set targets not standards	1. The flexibility which policy HO5 appears to suggest is welcomed, and should be strengthened in order to confirm that minimum densities comprise targets, rather than standards, and formalise the ability to deviate from target densities to allow for, and accommodate, local circumstances, housing need, and site constraints.	The comments are noted however the Policy is clear that the minimum density of 30dph is a target and is subject to a range of qualifying factors which allow if necessary a departure from the target. It is therefore a suitably flexible policy. There is no indication within this section of the CSPD that the policy is setting standards – the word standards does not appear at all whereas the word target appears in the policy title, the policy itself and the supporting text. It is therefore not clear why an amendment to specify that these targets are not standards is necessary nor how it would improve the clarity of the policy.	495
2. HO5 - Potential for lower densities in lower tier settlements	1. Barratt David Wilson Homes and CKK broadly support the wording of Policy HO5 which allows some flexibility to ensure the most efficient use of land is made whilst ensuring an appropriate layout is achieved reflecting the nature of a site. Density targets are only set out for Bradford and the Principal Towns, with densities in lower tiers of the settlement hierarchy to be set out in the Allocations DPD.	Support is noted. To be clear this incorrect and not what Policy HO5 says or intends. The 30dph density minimum applies across the district to all settlements and not just to the Regional City and Principal Towns. However the policy goes on to make 2 assertions – firstly that higher densities (than 30dph) may be possible in areas well served by public transport and within or close to the city centre and town centres and secondly that	396, 397, 400, 402

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		specific density targets for sub areas (or for settlements) may be set within the Allocations DPD or the Area Action Plans and it also acknowledges that this may include the setting lower density targets where justified by local circumstances. It is not wise to second guess what the Allocations DPD will include, however it would not be surprising if lower densities, when compared to the larger urban areas, were considered more appropriate in some of the lower tier settlements in order to maintain their character and identity.	
3. HO5 - Setting of any density targets is contrary to the NPPF	1. Efficient use of land is one of the core principles of sustainable development alongside creating well designed high quality places. However, the NPPF does not prescribe housing densities targets. As a consequence any approach which does so is not consistent with the Framework and should be deleted. It may be appropriate to utilise 30 dwellings per hectare as a measure to gauge the efficient use of land but it should not be an explicit policy objective. We would suggest that provisions B and C of HO5 should be deleted.	The objector’s argument is erroneous and vexatious. The Framework does not prescribe housing density targets merely because this is a matter for LPA’s to consider. Government guidance has trended away from setting indicative targets on such matters preferring instead that these matters are left to local decision based on local circumstance. Paragraph 47 of the NPPF clearly allows for LPA’s to include density targets or guidelines within their Local Plans. It states: “To boost significantly the supply of housing, local planning authorities should: <ul style="list-style-type: none"> • set out their own approach to housing density to reflect local circumstances. This is precisely what Policy HO5 does.	512
4. HO5 - Policy needs Qualifying as 30dph Not Always Achievable	1. On a number of sites in Bradford it has not proved possible due to access, topography and other constraints to achieve the minimum net density target of 30dwgs / hectare also contained in the current development plan. This target, if it is to remain as a statement of policy requires more clarification and qualification.	The comments are not justified. The supporting text already allows for flexibility in the application of the 30dph minimum for the sort of reasons mentioned.	447
5. HO5 - Object to ‘at least’	1. We object to the requirement to achieve “at least a minimum of 30 dwellings per hectare”. It is our recent experience that house builders are building at densities between 20 and 35 dwellings per	The policy requires no modification as it already a degree of flexibility as indicated by the text within paragraph 5.3.80 and the inclusion of the word ‘normally’ in criterion B of the policy.	129

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	<p>hectare. Furthermore there will be situation, often in smaller settlements, when the character of an area dictates a particular density of development or there is an overriding need to provide open space or surface attention of water which means that achieving the minimum density would be inappropriate or it simply cannot be achieved. In order to provide flexibility the policy should be modified to allow for these situations.</p>	<p>What this objection indicates is that if land is to be used efficiently the Local Plan needs to give a clear steer to developers as to the importance of using land efficiently and to set a benchmark minimum so that this is built in to the site appraisal and scheme design process at the outset. Having undertaken this process, the particular circumstances of the site and the scheme can then be discussed with the Council's Development Management Team either at pre-app or application stage where, if justified, the policy will allow for all parties to agree on a lower density where access, topography, local character or other factors warrant it.</p>	
<p>5. HO5 - Object to 'at least'</p>	<p>2. Policy HO5 criterion B should be amended to read "sites should normally be built at a density of 30 dwellings per hectare but there will be circumstance, such as in locations close to a major public transport corridor or in a town or the city centre when higher densities would be appropriate and similarly in smaller settlement and where the character of the adjoining area dictates a low density would be appropriate".</p>	<p>The wording as suggested is not consistent with the principle that developments should normally achieve a density of <u>at least</u> 30dph and that land should be used efficiently. It would lead to schemes which achieve lower yields which in turn would lead to the need for even greater green belt releases, more dispersal of development, more pressure on local transport networks and greater costs in the provision of local services.</p> <p>The suggested amendment is also unnecessary as the supporting text already allows for variations in density in certain circumstances</p>	<p>129</p>
<p>6. HO5 - The text within paragraph 5.3.80 is too prescriptive</p>	<p>1. The supporting text refers to the delivery of higher densities in areas well served by public transport as set out in the policy. However, the supporting text of paragraph 5.3.80 is extremely prescriptive and this contradicts the flexibility suggested in the wording of the policy. In addition, the accessibility of the site should not be the sole determining factor in assessing whether higher densities will be required, as this should be determined on a site by site basis taking into account the surrounding density of development and other site specific factors</p>	<p>The text is not prescriptive – it is merely seeking to define what is meant by areas well served by public transport and where densities higher than 30dph minimum might be required. It therefore does not conflict with the flexibility within the policy to take account of other factors such site specific factors, including the character of surrounding areas.</p>	<p>396, 397, 400, 402</p>

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<p>7. HO5 - Objection to the density targets chosen</p>	<p>1. We consider that Para A needs strengthening to allow new development perhaps at a significantly lower density than 30 houses per an hectare providing it provides the highest possible density while still appropriate to their surroundings. For example in Menston and Burley.</p>	<p>This would not be appropriate. The policy would be weakened, land would be wasted and more land would be needed in the green belt as a consequence. Moreover the change is not required as there is flexibility in the policy already by inclusion of the word normally and also recognition in the policy that factors such as the nature of the site and surrounding character can be taken into account. This flexibility is further re-inforced by the text within paragraph 5.3.80. Moreover the policy also allows for locally specific targets to be set in places such as Menston and Burley where justified. This could be either within the Local Plan or within Neighbourhood Plans as long as those targets can be justified by evidence and local circumstance.</p>	<p>135, 342</p>
<p>8. HO5 - The density targets are too low.</p>	<p>1. Several objections as detailed below suggest that the density targets have been set too low:</p> <p>The plan is unsound - the minimum density target of 30 dwellings per hectare (dph) is far too low and thereby unnecessarily increases the pressure on green space and green belt. See 5.3.77.</p> <p>Anything below 60 dpha does not support public transport and is therefore unsustainable. Most traditional developments, both in towns and villages, have housing densities in the range 50-100 dpha</p> <p>If the minimum density was increased to just 40 dph then the land requirement reduces by 25%. This is exactly the amount of green belt that the Council intends to destroy.</p>	<p>The Council considers that the minimum density target has been set at the right level. If higher densities can be justified they can still be either negotiated at the planning application stage or alternatively if such higher densities are appropriate across a certain sub area of settlement then they can be established in policy within the Allocations DPD or within Neighbourhood Plans.</p> <p>Densities of 60dph would not however be either achievable or desirable in many parts of the district and could either lead to development which does not reflect the character of surrounding areas or does not reflect the type of housing needed.</p> <p>The assumption about removal of the need for green belt if the minimum density requirement is raised to 40dph is mistaken and incorrect. This is because the land supply requirement and thus need for green belt has not been based on a simple assumption that all sites will only achieve 30dph.</p> <p>The need for green belt is based on an analysis of what the</p>	<p>393, 394</p>

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		land supply, as analysed and assessed within the SHLAA, can deliver. The SHLAA places sites within a range of density bandings and in some cases it is therefore already assumed that sites will deliver more than 30dph. The objection is also ignoring the fact that the policy specifically requires all sites to make the best and most efficient use of land which in some cases will mean higher densities (though the policy also allows for lower densities in some circumstances).	
8. HO5 - The density targets are too low.	2. The targets and indicators are effectively meaningless, because developers will prefer to build sites are around 30 dwellings per hectare in any case	This is incorrect. The fact that some developers have objected to the 30dph minimum indicates that this is not the case. Moreover some schemes are currently delivering less than 30dph, some schemes have their densities increased as a result of the efforts of the planning service to secure better designs at planning application stage.	394
9. HO5 - No evidence in support of the policy	1. Whilst paragraph 47 of the Framework permits the Council to set out its approach to housing density to reflect local circumstances our Client has not seen any substantive evidence to support the Council's position. On this basis the policy is unsound as it cannot be justified.	The Council disagrees. The policy justification is set out within paragraphs 5.3.78 to 5.3.81 of the plan. It is noted that the objector fails to provide any indication as to why the proposed target does not reflect local circumstances and what alternative target is proposed.	105, 423, 444, 437
10. HO5 - Conflicts with Policy HO8	2. The policy requirements may create conflict with other policies particularly Policy HO8, which seeks larger homes and need for accessible homes both of which need larger floor areas and therefore will reduce densities, and Policy DS3 which seeks development to be within the context of its urban character.	The Council does not agree that there needs be any conflict between these different policy objectives but more significantly if there are good design reasons for reduced densities then the wording of Policy HO5 and the supporting text give sufficient flexibility to allow for this.	105, 444, 437
11. HO5 - Net vs Gross Densities	3. Policy HO5 seeks a minimum density of 30dph across all sites. It is unclear whether such a requirement relates to net or gross site areas. Given other requirements within the plan, such as open space and Policy DS3 it is important that any requirement should relate	The policy is intended to apply to net site areas and this is standards practice in most similar policies and indeed in the current RUDP. The absence of this detailed definition does not in itself make the policy and the principles behind it unsound however a minor addition could if necessary be made to the supporting text to make this clear.	105, 423, 437, 444

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	solely to the net developable area.		
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POLICY HO6 – MAXIMISING THE USE OF PREVIOUSLY DEVELOPED LAND			
	Support for the policy		
HO6	1. The use of an indicative and aspirational target for brownfield development of around 50% is supported	Support noted although it should be pointed out that the PDL target is based on evidence of what can be delivered.	447
HO6	2. The policy sets a District wide target of 50% which is considered to be appropriate and supported by evidence within the Council's SHLAA. In Local Growth Centres a lower target of 15% has been set to reflect the nature of the land supply in those settlements. We support this lower target in the Local Growth Centres.	Support is noted.	396, 397, 400, 402
HO6	3. We support the intention to give priority to development which will involve the re-use of previously developed land and buildings.	Support noted.	103
HO6	4. We support this policy which suggests that 50% of new housing within Principal Towns should be delivered on Previously Developed Land.	Support noted.	186
HO6	5. Policy HO6 of the Core Strategy advocates maximising the use of previously developed land with a clear priority given to the development of previously developed land and buildings. The policy emphasises the need for a minimum of 55% of the total number of dwellings to be subsequently allocated within the Allocations DPD on previously developed land. My clients sites could provide a significant element towards the achievement of this total.	The comments are noted.	431
HO6	6. We would be broadly in agreement (Policies HO6, HO7).	Support noted	445
HO6	7. We would emphasise strongly that only brown	The comments are noted. However any process which	445

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	field sites which lie within the green belt in the Burley Parish should be considered for development with no further release of green belt land; as the impact on conservation areas, the overall environment of communities which make them attractive places and provide 'Quality environment critical to social/economic wellbeing of the district' .	determined which sites to allocate for development or which green belt land to release for development solely on the basis of its green field status would be fundamentally flawed for two reasons – firstly because a site's status as previously developed or green field is only one of a number of factors which must be assessed in determining a site's suitability and sustainability for development and secondly because where alternative green belt releases are being assessed the impacts on the functions and purpose of green belt have to be considered and a site's status as green field or previously developed is largely irrelevant to that assessment.	
Objections to the policy			
1. HO6 - The NPPF Does Not Refer to PDL targets	1. There is no reference to policy targets for previously developed land in the NPPF. Consequently we consider that the draft policy is not consistent with Government guidance and should be deleted.	This is incorrect. Paragraph 111 of the NPPF states that: " Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land."	512
2. HO6 - Conflict With the NPPF as NPPF Uses the Term Encourage Not Prioritise	1. Policy HO6 supports the development of PDL. Whilst we broadly support the general approach of the policy, the wording of the policy is deemed to be inconsistent with NPPF which refers to encouraging the development of PDL – the policy seeks to give priority to the development of PDL.	It is not considered that the policy is inconsistent with the NPPF either in its detail or in terms of the principle underpinning it. It is quite correct to say that the wording used in the NPPF is encouraging the use of PDL. However such encouragement cannot be realised unless the Council and other public agencies take action via their plans, policies or programmes to stimulate such development. This can include prioritising the use of such development opportunities. Taking the plan's housing policies as a whole, the Council has made it clear that the application of its policies such as on phasing and PDL will not be on a simplistic brownfield first basis and must maintain an adequate and varied supply of sites to meet need. Taking the NPPF as a whole it is clear that the Government is	396, 397, 400, 402, 129, 447

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		placing great emphasis on the provision of increased supply of housing to meet local needs but at the same time also wishes to see that development delivered in a sustainable way which includes the re-use of previously developed land. Thus as long as the Council's policies and targets for the use of such land are achievable and justified by evidence - which they are - there is no reason why <u>prioritising</u> development on PDL need be in conflict with the NPPF.	
3. HO6 - Prioritising PDL at the Expense of a % Year Land Supply Is Contrary to NPPF	1. In order to ensure the soundness of the plan, the development of brownfield land cannot be prioritised at the expense of ensuring a five year supply of deliverable housing sites, as a clear requirement of NPPF	The development of previously developed land is not being prioritised at the expense of ensuring a 5 year supply of deliverable sites. Point 2 within part A of Policy HO6 clearly indicates that prioritisation of brownfield sites must be done in a way which maintains a 5 year land supply. Moreover the PDL targets have been set at a level which can be delivered reflecting the land supply within the SHLAA. Also there is nothing in the plan to stop green field sites being moved into the early part of the plan period to ensure a 5 year supply is maintained if some previously developed sites need a longer lead time before they can be delivered.	105, 495
3. HO6 - Prioritising PDL at the Expense of a % Year Land Supply Is Contrary to NPPF	2. The HBF suggest that they be flexible targets to ensure a 5 year supply can be maintained and that the targets are for the whole of the plan period, not a year on year target.	The PDL targets are – as is indicated in the wording of criterion B of Policy HO6 – set for the whole plan period. The policy does not intend and does not indicate that the proposed targets have to be met on a year by year basis.	105
4. HO6 - Consistency and Relationship to Policy SC5	1. Whilst suggesting in para 5.3.91 that no moratorium is being proposed and that a site's status will not be the only factor in determining which sites will be allocated, Policy SC5 which sets out a sequential approach to site selection and therefore does prioritise the development of brownfield sites. This policy therefore results in brownfield sites	The first point to make is that there is a very significant difference between an approach which prioritises brownfield sites and one which includes a moratorium on other i.e. green field sites. There is no such moratorium proposed within either policy. The second point is that the prioritisation of brownfield sites within the Core Strategy is a heavily qualified one and those specific qualifications have been designed to ensure that	396, 397, 400, 402

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	<p>being afforded more weight in the allocation process than is suggested in paragraph 5.3.91. As previously set out, we do not consider Policy SC5 to be sound and do not support the sequential approach to site selection supported by that policy.</p>	<p>delivery is at the heart of the site selection process. The second section of part A of Policy HO6 clearly suggests that the prioritisation has to be consistent with:</p> <ol style="list-style-type: none"> 1. the deliverable and developable land supply; 2. the need to maintain a 5 year land supply of deliverable sites; 3. the need to coordinate development with infrastructure provision; and 4. the need to maintain delivery of the scale and type of homes required throughout the plan period; <p>So to be clear - in the selection of sites to meet the need for housing, any prioritising of the allocation of brown field sites will only happen where those sites are deliverable or developable and where such prioritisation would not result in an absence of a 5 year land supply and would not undermine overall delivery of the scale and type of homes needed. There are thus safeguards and caveats which relate to the timing of delivery and to ensuring a range of the right type of homes.</p> <p>Policy SC5 makes a very direct link to Policy HO6 and therefore confirms that the principles of Policy SC5 are subject to the same caveats as set out in part A of Policy HO6. If necessary this could be made clearer by virtue of minor amendments to the supporting text of Policy SC5.</p> <p>In conclusion, if all the caveats and safeguards set out above are met then yes the Plan will give more weight to the allocation of a brown field site and quite rightly so. In many cases the development of brown field sites will provide more added and cumulative benefits to an area by virtue of clearing and improving those sites, improving the appearance and outlook of an area and increasing confidence and prospects for further future investment. Put simply if the Council, having established that such sites are developable and will provide</p>	
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		the right type of housing needed in an area, are not allowed to prioritise them how on earth are they going to give effect to the Government policy and exhortation to encourage their development?	
5. HO6 - PDL Targets Should Not Stifle Development Rates or Undermine Meeting of Need	<p>1. As explicitly referred to within NPPF, the development rate and the achievement of meeting objectively assessed housing needs should not be stifled or prejudiced on the basis of target rates for the development of previously developed land.</p> <p>It is therefore recommended that reference is made within this policy to the need for brownfield development targets to be regularly reviewed to ensure timely delivery of housing needs in the places where they are needed.</p>	<p>The PDL target reflects the land supply and wider evidence base and is not stifling the meeting of housing needs.</p> <p>Brownfield targets are set within the statutory development plan. All elements of the statutory development will be reviewed using the normal processes and as appropriate via the Council's Annual Monitoring Report. No such reference is therefore required.</p>	495
6. HO6 - PDL Targets Are Too High - Should Be Justified By Evidence – SHLAA / Land Supply	<p>1. A detailed review of the 2013 SHLAA is very likely to demonstrate that a number of those sites being relied upon to meet the targets set out within Policy HO6 will not be deliverable or viable. The district wide target of 50% of all development being delivered on brownfield sites is therefore not considered to provide a realistic or deliverable baseline which will guarantee the delivery of objectively assessed housing needs.</p>	<p>The Council disagrees. The SHLAA provides a sound basis for deriving what are both modest and achievable PDL targets. Moreover the fact that the objector states that ' a detailed review of the 2013 SHLAA is very likely to indicate..' suggests that the objector has reached their conclusion without any actual analysis or evidence to back it up. It is also interesting to note that other developers including Barratt David Wilson Homes – who were part of the SHLAA Working Group - have made representations supporting the targets as justified and reasonable.</p>	495
6. HO6 - PDL Targets Are Too High - Should Be Justified By Evidence – SHLAA / Land Supply	<p>2. We note that the Core Strategy suggests that they have interrogated the SHLAA to arrive at the settlement hierarchy derived targets. This is a good starting point but given the importance of this policy we would have expected to see a more robust evidence base such as a report which tests the viability of delivery against certain assumptions and bench marks.</p>	<p>Policy HO6 has been assessed within the Viability Assessment produced by consultants DTZ.</p> <p>It should also be stressed that the actual assessment and selection of sites will take place within the Allocations DPD and this will itself be subject to further more detailed viability testing.</p>	129
7. HO6 - Viability	<p>1. Such targets must, be justified by evidence and ensure delivery of the overall housing requirement.</p>	<p>The Council has based the targets on the evidence within the SHLAA. The SHLAA has considered deliverability and</p>	105

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	<p>The Council's own evidence (Local Plan Viability Assessment) identifies viability issues across much of the Bradford area. This policy will simply exacerbate existing viability issues and perpetuate the current under-supply of dwellings against current and future housing requirements.</p>	<p>developability of sites while the Local Plan Viability Study has not recommended that Policy HO6 be amended or deleted.</p> <p>The Viability Study has identified generic viability problems in specific parts of the district under current market conditions but also identified the significantly changed picture which will result as the economy improves. The viability problems in parts of the district are not necessarily a function of a site's brownfield status but based on the development values that can be secured given the nature of the area, local incomes and the current state of the economy and housing market. It should also be pointed out that even within the Regional City of Bradford the Council are proposing that 45% of housing development will take place on green field sites.</p> <p>The HBF therefore provides no evidence or justification as to why the PDL targets chosen will undermine delivery of the housing requirement.</p> <p>Finally the HBF views appear to be in conflict with developers some of which have been part of the SHLAA process in Bradford and who consider the PDL targets to be reasonable and justified by the evidence base.</p>	
<p>8. HO6 - The previously developed land targets should be higher.</p>	<p>1. The plan is unsound because it does not take into sufficient account the new powers to turn empty commercial and retail premises into dwellings. See 5.3.88. For most cities the number of commercial property conversions would provide a small but welcome boost to the housing stock. In Bradford, as a largely unregenerated city, the potential number of converted dwellings is large enough to be strategically significant. The plan needs to be redone taking these conversions fully into account and a target percentage needs to be presented. Until it</p>	<p>The Council disagrees. The PDL targets for the Regional City have been set a little above the level which the SHLAA alone would indicate precisely because there will be further sources of sites such as those mentioned by the objector. Moreover any such sites which do become available for development, can if above the minimum size threshold, be included as allocations within the Local Plan. However all such sites will need to be proven to be deliverable. Finally it is not possible at this stage to project and estimate the number of dwellings that will come forward from such sources given that the changes are very recent, their impact unknown.</p>	<p>393</p>

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	is, the plan will remain unsound.		
8. HO6 - The previously developed land targets should be higher.	2. We welcome and support the inclusion of a target for previously using developed land. In the light of our comments on Policy HO5 on increasing densities, we would wish to see an increase in the PDL target achievable through increased densities, especially in the most sustainable locations.	The general support for the policy is welcomed. However it is not thought that higher targets could be set given the nature of the land supply. The PDL targets have been informed by the SHLAA data. SHLAA sites are assigned a range of densities, some higher than the 30dph district minima target within Policy HO4. Higher density targets (than 30dph) may be capable of being achieved in some areas but not across the board.	394
8. HO6 - The previously developed land targets should be higher.	3. Support for achieving at least 50% of housing on brownfield sites, but the percentage should be increased. Other councils use higher figures.	The targets set by the Council have to reflect the evidence base, most notably the land supply and deliverability. The targets proposed by the Council reflect the evidence. It is nonsensical to imply that Bradford's targets should be higher just because targets are higher in other local authority areas.	507
8. HO6 - The previously developed land targets should be higher.	4. Sufficient brown field sites exist to prevent need for green field development	This is incorrect. The area would be unable to meet much more than half of its objectively assessed housing need if no green field sites were brought forward.	409
8. HO6 - The previously developed land targets should be higher.	5. No account taken of thousands of redevelopment schemes or planning permissions on PDL which would significantly reduce the overall housing target.	It is not clear whether the comment is referring to past completions or future development opportunities. It is also clear that the objectors have not actually read the plan or the evidence base. If the comment is referring to past completions then there is no scope for reducing the overall housing target as all completions between 2004 and 2013 have already been accounted for. If the objection is referring to future development opportunities then the Council has thoroughly assessed potential development sites within the SHLAA.	25, 119, 454, 480, 518
8. HO6 - The previously developed land targets should be higher.	6. More emphasis on brownfield land / PDL needed for housing development	It is not clear what the objectors are asking for or what policy change they are suggesting. Policies HO6 and SC5 are seeking to prioritise development on previously developed sites subject to those sites being deliverable or developable and subject to maintaining the required overall housing delivery rates. The Council are working with partners to deliver housing in the urban areas and in particular on brown field	2, 17, 22, 23, 25, 27, 41, 46, 48, 59, 60, 74, 92, 97, 104, 107, 110, 119, 122, 131, 150, 155, 171, 177,

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		sites for example in the City Centre and in the Canal Road Corridor. The PDL targets within Policy HO6 reflect the evidence on the amount of land available and what is deliverable.	180, 183, 184, 197, 203, 211, 213, 214, 222, 225, 226, 235, 241, 250, 251, 252, 254, 269, 270, 272, 282, 287, 291, 294, 295, 296, 310, 312, 314, 318, 329, 335, 352, 360, 365, 367, 370, 378, 391, 392, 403, 405, 453, 454, 492, 506, 516
8. HO6 - The previously developed land targets should be higher.	7. More emphasis on brownfield land / PDL in Bradford – not Ilkley	Policy HO6 contains targets for the delivery of new homes on previously developed land which reflect the evidence base in particular the type, distribution and extent of the deliverable and developable land supply. There is simply insufficient deliverable brown field land within Bradford or Ilkley to warrant higher PDL targets. The Regional City is proposed for over 28,000 new homes or 68% of the district’s overall housing requirement compared to just 800 new homes or 1.9% in Ilkley. Even the Bradford target cannot be met without substantial contributions from green filed sites and from green belt.	141, 147, 149, 153, 154, 171, 177, 180, 204, 214, 230, 232, 233, 257, 258, 259, 260, 261, 262, 264, 265, 268, 269, 272, 293, 300, 302, 307, 315, 317, 319, 323, 324, 325, 336, 341, 349, 372, 374, 385, 398, 405, 411, 418, 425, 426, 459, 460, 464, 469, 470, 472, 474
8. HO6 - The	8. Paragraph 5.3.86 - This paragraph states that	No this is incorrect. There is sufficient deliverable and	507

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previously developed land targets should be higher.	there is not enough brownfield land to meet the housing targets. This should not be the attitude; the Council should be aiming to recycle as much land as possible.	developable land to meet the targets as set out in Policy HO6. What the paragraph is saying is that there is insufficient deliverable and developable land to maintain the PDL percentages which have been achieved in recent years at very low overall delivery quantum. The targets within the Core Strategy therefore reflect the evidence.	
9. HO6 - The Policy is meaningless	1. This policy and figure are both unsound and without meaning unless developers have committed to these sites and can be guaranteed not to abandon them as we move through the plan period. Whatever the Council's wishes, if a site is deemed insufficiently profitable it will not be developed.	The Council considers that the PDL targets are reasonable and deliverable and are informed by and justified by the evidence base. If those targets are not achievable then the plan would need to lower them and allocate more green field sites as the Council are required to ensure that the objectively assessed needs for new homes are met. It is not clear whether the objector understands this and is therefore advocating the release of more green field land? The Council cannot compel developers to develop specific sites and government policy does not allow a moratorium on the development of green field sites until PDL sites are taken up.	393
9. HO6 - The Policy is meaningless	2. The draft includes yet more targets and percentages for take up of PDL but there is little evidence in the Draft to offer reassurance that performance will improve.	Firstly the policy is not based on take up of PDL but on actual housing completions. Policy HO6 is fully justified in relation to the realities of the potential land supply as set out within the SHLAA. It is recommended that the objector avails themselves of the facts as set out in the AMR which show very good recent performance re PDL albeit at very low overall completion volumes.	483
10. HO6 - Moratorium on Green Field Sites Development Until Brown Field	1. Suggests that the policy should be more draconian by preventing any development on green field sites before brown field sites are all developed	This would be in conflict with the NPPF and would undermine housing delivery. It would result in a failure to meet the objectively assessed housing needs of the district population.	409

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Sites Have Been Developed			
11. HO6 - Objections relating to the detail of the policy and its wording	1. This policy does not explicitly confirm that it includes previously developed buildings and we consider that it should do. The title of the policy should therefore be amended to read “Maximising the Use of Previously Developed Land and Buildings”;	The proposed change is not necessary. Part A of the policy specifically refers to both land and buildings.	188
11. HO6 - Objections relating to the detail of the policy and its wording	2. This seeks to maximise use of PDL and suggests 35% of sites in LSCs be on PDL. We assume this is not per LSC but generally across all LSCs in order to be flexible.	Paragraph 5.3.90 states that, “For purposes of clarity with regard to monitoring, the targets set out in Policy HO6 are for actual delivery of housing completions. Also the 4 targets which refer to the Regional City, The Principal Towns, The Local Growth Centres, The Local Service Centres are for the delivery across each tier of the settlement hierarchy as whole. This therefore allows flexibility for individual settlements to achieve higher or lower proportions according to the circumstances in each case”.	108
11. HO6 - Objections relating to the detail of the policy and its wording	3. Having considered the SHLAA sites promoted in Addingham, no previously developed sites exist. Providing for a minimum of 35% of new homes in Local Service Centres is provided on previously developed land could lead to an inadvertent moratorium upon development should insufficient sites exist.	See above.	437
12. HO6 - Monitoring / how the policy would be applied	1. It is unclear how the policy fits into the overall monitor position e.g. it is unclear what action would occur if failure to comply with this policy, on any of its limbs, happened.	See Core Strategy Appendix 6	129
12. HO6 - Monitoring / how the policy would be applied	2. Policy HO6 states that 'the Council will monitor performance against the targets [for use of PDL] and will take action if performance slips outside of the ranges. What action will be taken?	This will depend on the issues raised and the reasons behind under delivery against the targets. See Core Strategy Appendix 6	79
13. HO6 - Other Comments	1. The supporting text refers to Policy SC4 in error, as it is clear the text should be cross-referencing Policy SC5.	Noted. Change to supporting text required to correct the mistake.	396, 397, 400, 402

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13. HO6 - Other Comments	2. Support the use of previously developed land for development.	It is not clear whether this comment is referring to Policy HO6 or whether it is a support or objection. However the sentiment underlying the comment is noted. Policy HO6 seeks to prioritise development on brown field sites where those sites are genuinely deliverable or developable.	36
13. HO6 - Other Comments	3. Only suitable brownfield site in Ilkley is the old Spooner site / acquired by Tesco – but never developed. This site should be used for housing	The most appropriate use for specific sites will be considered within the Allocations DPD. Green field sites will need to make a significant contribution to meeting the Ilkley housing target however it should be noted that 12 of the Ilkley sites within the SHLAA Update were either PDL or mixed PDL / greenfield.	148, 150, 155, 391, 392, 403, 410, 453
13. HO6 - Other Comments	4. Allow infill developments in Wharfedale to meet the requirements of a “relatively static population”	This is a detailed policy matter which will be considered within the Allocations DPD.	25, 41, 46
13. HO6 - Other Comments	5. Facilitate development of social and affordable housing on PDL sites.	There is nothing within the plan to prevent this happening subject to available funding and suitable deliverable sites in the right locations.	2, 336
13. HO6 - Other Comments	6. Urban apartment living in Bradford should be considered before building in the countryside	The Council are required to provide both the quantum and types of housing which the district’s population needs. It has to promote an approach to delivering these homes which is deliverable and reflects the market, land supply and deliverability. Apartments will be appropriate and deliverable in some instances but in many cases will not. The Core Strategy is already proposing 3,500 new homes in Bradford City Centre some of which are likely to be apartments and over 28,000 in the Regional City as a whole again some of which in locations close to services and public transport may be apartments. The Core Strategy also includes a policy, Policy HO5, designed to ensure that land is used efficiently.	337
13. HO6 - Other Comments	7. Development of brownfield sites should be the first priority	See policies HO6 and SC5.	13, 201
13. HO6 - Other Comments	8. Use of brownfield sites for housing and industry as a priority before Greenfield or greenbelt	See policies HO6, HO7 and SC5	26, 409, 507
13. HO6 - Other Comments	9. Development of greenfield sites mitigates against the presumption in favour of brownfield development	There is no policy within the plan or within the NPPF which refers to ‘a presumption in favour of brownfield development’. The Council disagrees with the assertion made by this objector. The Council cannot force developers to develop	498

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		particular sites and there is no evidence that placing a moratorium on green field sites will assist delivery on brown field sites, it will simply frustrate the overall delivery of much needed new homes contrary to the principles of sustainable development. Sites, whether green field or brown field will be developed if they are genuinely available, deliverable and developable and there is a demand for new homes in those areas.	
13. HO6 - Other Comments	10. Derelict urban sites which are undesignated should be examined carefully and designated for housing employment or education. They should not be left with no planned usage because an owner is waiting for the land value to increase	There is nothing in the plan to suggest that derelict urban sites will not be assessed. The Allocations DPD will consider all options. But, in line with the requirements of the Government, such sites will only be allocated for development if it can be shown that they are available for development and there is a reasonable probability that they will be developed during the plan period.	159

POLICY HO7 – HOUSING SITE ALLOCATION PRINCIPLES			
	Support for the Policy.		
HO7	1. We welcome the inclusion of a detailed policy to guide the allocation of sites.	Support noted and welcomed.	129
HO7	2. We support this policy on the basis that it includes prioritising allocations which would assist in regeneration and it reiterates that the use of previously developed land/ buildings should be maximised;	Support noted and welcomed.	188
HO7	3. The Environment Agency are pleased to see that our previous comments have been taken on board and included within the latest iteration of the Core Strategy and we offer our full support to these, in particular: Policy HO7 – Housing Site Allocation Principles: inclusion of flood risk sequential test	Support noted and welcomed.	493
HO7	4. We support the requirement that potential housing sites should relate well to the settlement's	Support noted	103

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	form and landscape setting. This will assist in safeguarding the distinctive character of the towns and villages in the plan area.		
HO7	5. Yorkshire Water supports the policy particularly with regard to Parts C and D which promote maximising the use of previously developed land and prioritising sites which would remedy deficiencies in local infrastructure.	Support noted	123
HO7	6. Policy HO7 sets out the housing site allocation principles. My clients sites would meet these various identified principles which would support their specific allocation as part of the subsequent Allocations DPD exercise.	Support noted	431
HO7	7. We would be broadly in agreement (Policies HO6, HO7).	Support noted.	445
HO7	8. We support the general approach of the policy which seeks to indicate the key considerations that will shape the allocation process	Support noted	396, 397, 400, 402
HO7	9. Countryside Properties are supportive of the wording of Policy HO7 and the need to allocate sufficient deliverable and developable sites to meet the targets set out in Policies HO1 and HO3	Support noted.	517
HO7	10. Natural England supports the general approach within policy HO7	Support noted and welcomed.	513
Objections to the Policy			
1. HO7 General Objections	1. This policy draws upon many of the principles established in other policies to which we have objected, including prioritising previously developed land and the phasing of future sites.	The Council disagrees with the views of the objector on the other policies and therefore does not consider the criticisms of Policy HO7 are valid.	437
1. HO7 General Objections	2. The policy content in the PDCS does not constitute clear policy criteria for the site selection process. There are some contradictions arising from the selected principles. For example greenfield and	The Council disagrees. There are no such contradictions – regardless of the ability of green belt sites to deliver CIL, the approach to green belt release has to follow national planning guidance and the	447

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	<p>Green Belt sites will have the greatest ability to provide funding through CIL or section 106 agreements for necessary supporting Infrastructure.</p> <p>Selecting sites accessible to quality public transport services should be supported but this runs counter to the earlier statements regarding the avoidance of the use of transport as a key determinant of development location in the Bradford context.</p> <p>This policy is also contrary to the content of the phasing policy HO4.</p>	<p>criteria in Policy HO7 relating to green belt do just that.</p> <p>No it does not – the earlier statement related to strategic planning at a much higher level and to traffic modelling – it had nothing to do with individual site selection. It should also be pointed out that Policy SC5 already includes taking an accessibility based approach which incorporates transportation factors.</p> <p>In what way?</p>	
1. HO7 General Objections	3. A number of the provisions repeat other elements of the Core Strategy, are not consistent with Government or do not provide certainty.	The objector fails to be specify which elements of the policy are being referred to and why they are contrary to government policy so it is not possible to respond.	512
1. HO7 General Objections	4. Housing Site Allocation Principles as set out in table HO7 are at variance with other policies in the Draft, are imprecise and are still a work in progress: none of this gives reassurance to the public that this important policy will be executed equitably and proportionally: in this latter respect the draft is incomplete.	There is no conflict between Policy HO7 and the rest of the Core Strategy. No detail is given by the objector as to what is missing from the policy or what might be done to improve it.	483
1. HO7 General Objections	5. The general thrust of policy HO7 is supported but it needs to recognise the need to balance the distribution of housing with jobs as an important guiding principle.	This would not be appropriate. Any requirement to balance housing and employment distribution has been dealt with in Policy HO3. It is not clear how such as criteria would apply to the comparison and selection of sites among all the candidates.	406
2. HO7 Criterion A	1. Part (A) should be amended to include the provision to undertake a Green Belt review. Part (A) should therefore read: “The need to allocate sufficient deliverable and developable sites, including from Local Green Belt releases, to meet the targets set out in the Core	This is not relevant to the main purpose of the policy which is to set out site allocation principles and is unnecessary as the need for green belt land to meet housing need has already been set out in policy HO2 and the need for a green belt review is set out in Policy SC7.	186, 415

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	Strategy Policies HO1 and HO3”.		
3. HO7 Criterion B - Regeneration	2. We object to criterion B and C. Criteria B and C implies that that a range and choice of housing sites to meet the districts housing needs will not be provided. This would result in unmet demand.	There is nothing within criterion B or C which would have this effect.	129
4. HO7 Criterion C – Phasing & Maximising Use of PDL	3. Criterion C seeks to prioritise the development of previously developed land, which as we have mentioned before, would be contrary to the NPPF. The criteria could undermine delivery of the required housing.	The Council disagrees and its position with regard to this matter are set out in its response to representations made to Policy HO6.	105, 129
4. HO7 Criterion C – Phasing & Maximising Use of PDL	4. The explicit use of phasing policies within the site allocation principles is contrary to the NPPF.	The Council disagrees. See Policy HO4 section of this table.	435
5. HO7 Criterion E – Minimising Use of Green Belt	1. Part (E) of Draft Policy HO7 should be amended to reflect that Green Belt land will be released to deliver some 11,000 homes across the Plan Period.	This proposed change is unnecessary as the need for a local green belt review is already established within Policy SC7 and HO2, and would also undermine the clarity of the policy.	186, 415
5. HO7 Criterion E – Minimising Use of Green Belt	2. Part E of the Policy HO7 makes reference to minimising the use of Green Belt within the plan area. It is considered that this should be expanded to acknowledge that there may be occasions where the allocation of Green Belt land represents the most sustainable and deliverable approach to meeting future housing needs.	The proposed change is not necessary. It is a given that the site appraisal process will need to assess what would be the most sustainable options to meet housing targets. The change would also be misleading as green belt deletions and change are subject to very specific considerations which include an overriding need to show that there are exceptional circumstances for that change.	186, 415, 495
5. HO7 Criterion E – Minimising Use of Green Belt	3. Part C of the policy states that the Council will seek to maximise the use of previously developed land whilst part E seeks to minimise the use of green belt land. In seeking to maximise the use of previously developed land it is stated that this is subject to the maintenance of a range of sites which meet local need and provision of a 5 year supply of deliverable sites. In seeking to minimise the use of Green Belt land there is no such reference to the maintenance of a range of sites to meet local need	It is debatable whether this change would add anything to or improve the policy. The need to allocate sufficient deliverable sites – and deliverable means sites which can be implemented within the first 5 years of the plan period and which therefore help maintain a 5 year land supply – is already established as a key principle in criterion A. Moreover green belt release are subject to specific provisions and justification within the NPPF which do not apply to other types of site.	396, 397, 400, 402

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	or a 5 year housing land supply	A specific reference is made to maintaining a 5 year land supply in point C simply because there are more likely to be conflicts between the two objectives where brown field sites are being considered for allocation as many will lie in the main urban areas where development values are lower and where delivery may be more likely in the middle and latter part of the plan period when economic and housing market conditions have improved.	
5. HO7 Criterion E – Minimising Use of Green Belt	4. New development in the Green Belt should be well screened	This is a matter which will be considered in the Allocations DPD.	278
6. HO7 Criterion F – Maximising Positive Environmental Benefits	1. Part F2 (maximising environmental benefits) should go beyond ensuring there is no net loss in biodiversity. It should ensure that developments achieve net gains in bio-diversity and enhancements to the ecological network. This accords with paragraphs 6, 109 and 152 of the NPPF. Part F2 should therefore read: “Would achieve net-gains in biodiversity and enhancements to biodiversity networks”	<p>Paragraphs 6 and 152 of the NPPF makes no reference to a requirement that development should achieve net gains in bio-diversity. The NPPF does not include a requirement for all development to provide enhancements to the ecological network.</p> <p>Paragraph 109 refers to a number of ways in which the planning system should contribute to and enhance the natural and local environment. This includes: “minimising impacts on biodiversity and providing net gains in biodiversity where possible,”</p> <p>The NPPF therefore does not support an amendment to Policy HO7 which would require all housing developments to achieve net gains in bio-diversity.</p>	513
7. HO7 Criterion G – Minimising Adverse Environmental Impacts	1. Development in Addingham should be small scale and organic	This is a matter to be determined within the Allocations DPD.	111, 226
8. HO7 / Para 5.3.93	1. Disagree with this paragraph as it suggests NPPF states sustainable development is at the	The NPPF contains no such specific statement. The point being made in the plan is that sustainable development is	507

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	heart of the growth and economic transformation of the Plan. NPPF states sustainability does not mean development at any cost.	defined not only in terms of how the policies and proposals might affect the environment but also on how they will assist in providing for the social and economic needs of the district. This is entirely in line with the NPPF.	
HO7 General comments	1. All proposed development allocations should be appraised as to their contribution to the green infrastructure or support of adjacent green infrastructure and the allocation selection criteria (HO7) shall seek to minimise adverse impacts to positively appraised sites.	It is unclear what this objection is referring to.	406
HO7 General comments	2. Policy HO7 has the aims of 'maximising the use of PDL and prioritising their development in phasing policies' and 'minimising the use of Green Belt land within the plan area' but the Core strategy is weak in how this will be achieved and we consider that these aims are undeliverable.	The Council disagrees.	79
HO7 General comments	3. The policy seems unduly prescriptive and surely this is for the SHLAA allocations and Allocations DPD.	The Council disagrees. The SHLAA is not a policy document and does not select sites for allocations. Policy HO7 provides a clear strategic framework for the assessment of sites within the Local Plan.	108
HO7 General comments	4. An analysis of Policy HO7: Housing Site Allocation Principles reveals the contradiction between these principles and their application in Wharfedale.	The role of the policy is to guide site selection as part of the Allocations DPD and not to determine housing quantum within settlements. There is therefore no contradiction. Policy HO7 includes a range of principles which should be used within the site allocations DPD to make choices over which sites should be allocated. The principles are not absolutes. For example having a principle which includes prioritising brown field land where shown to be deliverable does not mean that green field sites cannot be allocated. Clearly if brown field site options are limited or absent this then justifies the use of green field sites.	116
HO7 General comments	5. There should be no development north of the river in Ilkley as it would be unsustainable.	Policy HO7 sets out generic principles to guide the appraisal and allocation of sites within the Local Plan. Where development and sites should be allocated geographically in and around Ilkley is a matter for the Allocations DPD.	57

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POLICY HO8 – HOUSING MIX			
HO8	1. Delivering housing which meets the needs of older people		
HO8	1A. Commend the Council for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population within <i>Policy HO8</i> , specifically bullet point 6.	Noted.	58
HO8	1B. The wording of sub-clause 6 could be improved to read more positively with the substitution of the word 'greatest' with 'sufficient'	Noted. The policy as drafted is considered sound and the change proposed is not in itself required to make the plan sound. The change proposed may make the policy more positive however it is important that specialist housing is not located in areas of low demand	58
HO8	1C. Local authorities must consider the aging population when granting planning permissions and ensure sufficient bungalows, flats and sheltered accommodation to meet the growing demand for homes for older people. Question whether the Core Strategy is sufficiently robust to provide such accommodation through the planning process.	The council considers the Core Strategy is sound and sufficiently robust in meeting the needs of an ageing population and planning for the needs of older people in accordance with NPPF paragraph 50. Supporting the provision of specialist accommodation for older people is identified as a strategic housing priority in Policy HO8. Under Policy HO8 Part B larger sites will be expected to include a proportion of accessible homes as part of the overall housing mix.	113
HO8	1D. Welcome references in Policy HO8 Part D for more family housing and support to specialist accommodation for the elderly	Noted	135 342
HO8	1E. No specific mention is made of the need in parts of the District, and especially in Wharfedale, for smaller more manageable housing for pensioners who wish to downsize. Without such a policy statement a significant and	The council considers that Policy HO8 as drafted is sound and will deliver a range of housing which meets the needs of the district, including older people in accordance with NPPF paragraph 50. Supporting the provision of specialist accommodation for older	25, 118, 135, 236, 342

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	<p>growing elderly population will continue to live in unsatisfactory housing and thereby limit opportunities for inward relocation of families. Adding such emphasis to Policy HO8 will result in more houses coming on the market which are suitable for families.</p> <p>Policy HO8 should therefore include a policy statement with a particular emphasis on “increasing the necessary supply of suitable homes at suitable locations for older people to ‘down size into’”.</p>	<p>people is identified as a strategic housing priority in Policy HO8. Under Policy HO8 Part B larger sites will be expected to include a proportion of accessible homes as part of the overall housing mix.</p> <p>It is therefore considered that the proposed change is unnecessary and is not in itself required to make the plan sound.</p>	
HO8	2. Delivering an appropriate mix of housing		
HO8	2A. Policy HO8 requires a strategic emphasis on delivering housing of the type required. The Core Strategy does not demonstrate how this will be achieved or what measures will be taken if monitoring shows that it is not being achieved. This will be undeliverable.	<p>The Core Strategy clearly sets out how a housing mix will be achieved.</p> <p>Policy HO8 sets out the strategic housing priorities for the district and requires large sites to provide an appropriate mix of housing. The proposed housing mix on sites should be justified based on market demand and local evidence, including the SHMA. The housing mix will also be assessed through Building for Life¹² assessment as set out in Policy H09.</p> <p>Policy HO8 is to be delivered through the development management process. This approach will allow the housing mix proposed to be assessed on a site by site basis in relation to local need and demand. Specific guidance on a site/area basis may also be set out in the Allocation DPD, AAPs and Neighbourhood Plans.</p> <p>The approach to monitoring the plan is set out in section 7.</p> <p>It is considered that this approach will deliver an appropriate</p>	79

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		range of housing, in accordance with NPPF paragraphs 50 and 159	
HO8	2B. The plan is insufficiently precise about the types of housing that are needed in the various locations. Without this detail it is impossible to guarantee that Bradford's housing supply will be brought into balance. Leaving the developer to determine the types of houses will not guarantee the optimum mix .	<p>The council considers that the plan as drafted is sound. It is not considered appropriate to set out details of housing mix on an area or site basis in the Core Strategy as this approach is considered too prescriptive for a strategic Development Plan Document.</p> <p>NPPF paragraph 50 requires planning authorities to plan for a mix of housing. Policy HO8 sets out the strategic housing priorities for the District and requires large sites to provide an appropriate mix of housing. The housing mix should be justified based on market demand and local evidence, including the SHMA. Housing mix is also assessed through the Building for Life assessment as set out in Policy H09.</p> <p>This approach allows housing mix to be assessed on a site by site basis in relation to local need and demand. Specific guidance on a site/area basis may also be set out in the Allocation DPD and AAPs where appropriate.</p> <p>It is considered that this approach will deliver an appropriate range of housing in accordance with NPPF paragraphs 50 and 159.</p>	393
HO8	2C. There is no evidence to confirm that 20-25% affordable housing would meet HO8 D2 'Delivering sufficient affordable housing and meeting the needs of low income and first time buyers'	The evidence for the affordable housing target is derived from the SHMA 2013 in accordance with NPPF paragraph 159 and in line with the Planning Practice Guidance approach to assessing housing need. The approach is set out in detail under Policy HO11 Affordable housing.	79
HO8	2D. Housing mix is generally supported but the level of market demand for city centre flats is questioned.	<p>Comment of support noted.</p> <p>The demand for different types of housing and potential residential sites is considered through the SHMA and SHLAA respectively.</p>	108

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		It is appropriate to support the delivery of flats in appropriate locations such as the City Centre as part of the overall mix of housing. The city centre is a key regeneration area where intensification of uses is appropriate. Residential development is a key element of this. The City Centre AAP specifically will consider this in more detail.	
HO8	2E. Policy HO8 is ineffective as it is not considered a genuine mix of houses can be delivered on sites as small as 10 dwellings / 0.4 hectares. The site size threshold should therefore be increased for the policy to be effective and sound.	<p>NPPF paragraph 50 requires planning authorities to plan for a mix of housing. The approach to housing mix in policy HO8 is flexible and requires the mix of housing proposed to be justified based on evidence in the SHMA, local market demand and housing need. This approach allows the housing mix proposed to be assessed on a site by site basis in relation to local need and demand.</p> <p>Housing developments of 10 or more dwellings are considered as major applications by the council. A site size threshold of 10 dwellings is therefore considered an appropriate and sound basis for assessing housing mix.</p>	396 397 400 402
HO8 / Wharfedale	3. New family and executive homes in Ilkley will not fully satisfy housing need arising from Bradford due to low wages and unemployment	<p>Comment noted. The council considers that the plan as drafted is sound.</p> <p>NPPF paragraph 50 requires planning authorities to plan for a mix of housing. Policy HO8 sets out the strategic housing priorities for the district and requires large sites to provide an appropriate mix of housing. The housing mix should be justified based on market demand and local evidence, including the SHMA. Housing mix is also assessed through the Building for Life assessment as set out in Policy H09.</p> <p>This approach allows the housing mix proposed to be assessed on a site by site basis in relation to local need and demand.</p> <p>In addition affordable housing will be sought on sites as set out in Policy HO11.</p>	104, 107, 122, 142, 144, 147, 180, 183, 211

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		It is considered that this approach is likely to deliver an appropriate range of market and affordable housing in accordance with NPPF paragraphs 47, 50 and 159	
HO8 - Figure HO1	4. The Bradford SHMA sub areas do not correspond to the Core Strategy sub areas making like for like assessments of housing need in the areas impossible.	<p>Comment noted. The SHMA sub areas and Core Strategy sub areas are not intended to be directly comparable.</p> <p>The SHMA identifies sub areas within the district which exhibit similar housing market characteristics. The Core Strategy sub areas are based on a range of factors and are not limited by the Bradford District administrative boundaries.</p>	79
Policy HO9 – HOUSING QUALITY			
HO9	1. Policy HO9 will place substantial additional burdens upon housing development which is not justified by the evidence.		
HO9	1A. The Council’s viability evidence suggests that the implications of this policy combined with others will render the plan undeliverable. The policy is therefore contrary to NPPF paragraphs 173-177	<p>The standards in Policy HO9 have been subject to viability testing in accordance with NPPF paragraphs 173-174.</p> <p>It is considered that Policy HO9 achieves an appropriate balance of setting local sustainability and design standards which support good design, climate change mitigation and the Council’s carbon reduction targets, while taking into account economic viability and deliverability.</p> <p>The requirements in Policy HO9 are subject to feasibility and viability to ensure the policy does not impact on delivery in accordance with recommendations in the Local Plan Viability Assessment.</p> <p>The council therefore considers Policy HO9 to be justified and in conformity to the NPPF.</p>	105
HO9	1B. Whilst Policy HO9 is worded in a flexible manner the requirement to meet Code Level 4 from	The need to mitigate the impacts of climate change, the District’s challenging carbon reduction target and large	396 397 400 402

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	<p>the date of adoption cannot be justified given the viability issues identified in current market conditions.</p>	<p>population growth justify setting a local requirement for sustainable housing in Policy HO9 in accordance with NPPF paragraphs 93-95.</p> <p>The Viability Assessment indicates that requiring Code Level 4 has an impact in terms of uplift in build costs but is likely to be viable in the majority of the District when tested against higher value sensitivities. The requirement to meet CfSH Level 4 is subject to feasibility and/or viability to ensure it does not impact on delivery in accordance with recommendations in the Local Plan Viability Assessment.</p> <p>The council therefore considers that Criteria B is fully justified and achieves an appropriate balance of setting a local sustainability standard that supports climate change mitigation and the Council’s carbon reduction targets, while taking into account economic viability and deliverability.</p>	
HO9	<p>1c. It is important that the Council take account of the likely additional costs associated with both the CfSH and zero carbon. The Local Plan Viability Assessment (Sept 13) illustrates the viability issues once additional sustainable construction standards are applied. All but the two highest housing market value areas are incapable of withstanding CfSH level 4 under current economic conditions and only the very highest value area is capable of sustaining CfSH level 6</p> <p>Recommend Part B and associated text be deleted.</p>	<p>The council considers the policy as drafted is sound.</p> <p>The Local Plan Viability Assessment (Sept 2013) reviewed the policies in the Core Strategy Further Engagement Draft. In light of the Viability Assessment certain policies in the Core Strategy Publication Draft, including HO9 were revised. This included removing the requirement for CfSH level 6 and Lifetime Homes.</p> <p>The Viability Assessment indicates that requiring Code Level 4 has an impact in terms of uplift in build costs but is likely to be viable in the majority of the District when tested against higher value sensitivities. The requirement to meet CfSH Level 4 is subject to feasibility and/or viability to ensure it does not impact on delivery in accordance with recommendations in the Local Plan Viability Assessment.</p> <p>The costs of the Zero carbon are included in the Local Plan</p>	105

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		<p>Viability Assessment update.</p> <p>It is considered that Policy HO9 achieves an appropriate balance of setting local sustainability and design standards that will ensure good design and support climate change mitigation and the Council's carbon reduction targets, while taking into account economic viability and deliverability.</p>	
HO9	2. Building standards are best addressed through the building regulations		
HO9	2A. The requirement to meet building quality standards is best addressed through Building Regulations, rather than the planning process and such an approach is supported by the Council's own Local Plan Viability Assessment. It is maintained this policy is unnecessary in this regard.	<p>NPPF paragraph 95 requires any local requirement for a building's sustainability, to be consistent with the Government's zero carbon buildings policy and adopt nationally described standards.</p> <p>The need to mitigate the impacts of climate change, the district's challenging carbon reduction target and large population growth justify setting a local requirement for sustainable housing in Policy HO9 in accordance to NPPF paragraphs 93-95.</p> <p>The council recognise the government housing standards review may introduce new national standards for housing. Therefore to take account of future Government decisions on the Housing Standards Review, Policy HO9 also refers to any subsequent national standard to ensure the policy is flexible.</p> <p>The council therefore consider policy HO9 to be consistent with the Governments zero carbon buildings policy and sufficiently flexible to accommodate any changes through the housing standards review.</p>	397
HO9	2B. The government are considering the withdrawal of the CfSH through its standards review. Also given Zero Carbon Homes is likely to be a mandatory requirement through the Building	<p>NPPF paragraph 95 requires any local requirement for a building's sustainability, to be consistent with the Government's zero carbon buildings policy and adopt nationally described standards. Therefore the council disagree</p>	105, 443, 444, 512

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	<p>Regulations there is no need for the policy to repeat this issue.</p> <p>Recommend Part B and associated text be deleted.</p>	<p>that there is no need for the policy to refer to Zero Carbon Homes.</p> <p>The council recognise the government housing standards review may introduce new national standards for housing. However, at the time of writing the results of the Housing Standard review have not yet been decided.</p> <p>Therefore, to take account of any future Government decisions on the Housing Standards Review Policy HO9 also refers to any subsequent national standard to ensure the policy is flexible.</p> <p>The council therefore considers Policy HO9 to be consistent with the Governments zero carbon buildings policy and sufficiently flexible to accommodate any changes through the housing standards review.</p>	
H09	3. The requirement for Building for Life ¹² assessment should not be mandatory		

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HO9	<p>3A. The council should not seek to make Building for Life12 a mandatory requirement for all developments.</p> <p>The proposal will create additional costs and burdens upon the development industry. Recommend Part A and paragraph 5.3.16 be amended to encourage rather than require BfL12 standards</p>	<p>Good design is a key aspect of sustainable development and Local Plans should develop policies that set out the quality of development that will be expected for the area in accordance with NPPF paragraphs 56-58.</p> <p>BfL12 is the industry design standard for new housing developments, which is based on the NPPF requirements for good design and provides a consistent basis for assessing the design quality of housing schemes.</p> <p>The council does not consider this requirement to be a burden or unduly onerous and disagree that this requirement should be deleted or changed to encourage rather than require.</p>	105
	<p>3b. The requirement for schemes of over 10 dwellings to have to provide a building for life assessment is considered to be unduly onerous and is not justified.</p> <p>It is overly onerous to require developments to formally submit such assessments as they will simply create additional costs and burdens.</p> <p>As the evidence required to justify the mandatory requirement for such an assessment has not been made this element of the policy is unsound as it is unjustified. To make this part of the policy sound the Council should withdraw or make optional the requirement for such an assessment.</p>	See response to 3a	396 397 400 402 423 444
HO9	4. Part C. Lifetime Homes should be encouraged rather than required		

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HO9	<p>4A. Recommend the wording of Part C and the supporting text be amended to encourage rather than require adaptable homes to ensure viability can be maintained. The following wording is recommended; <i>The Council will encourage and support new homes which are designed to be accessible and easily adaptable to support the changing needs of families and individuals over their lifetime, including people with disabilities</i></p>	<p>Paragraph 5.3.140 in the supporting text clarifies that where feasible and viable the council will encourage new housing to achieve the Lifetime Homes Standard (or any subsequent revised national standard). This is not a requirement; however larger sites of 10 dwellings or more will be expected to include a proportion of accessible homes as part of the overall housing mix.</p> <p>The change proposed is not in itself required to make the plan sound.</p>	105
HO9	<p>4B. The policy should seek to encourage rather than require a specific standard. The additional costs per dwelling for implementing the standard is not an insignificant figure considering much of the plan area is unviable or marginal even with no additional burdens placed upon it.</p> <p>In addition, Lifetime Homes generally require a larger footprint but do not provide additional revenue, the costs on site of providing Lifetime Homes are often multiplied. This issue does not appear to have been considered within the viability study. On this basis Part C of the policy is unsound given that it is not justified against the evidence base provided by the Council. Part C should be adapted to ensure that such standards are optional/aspirational and not mandatory.</p>	<p>Paragraph 5.3.140 in the supporting text clarifies that where feasible and viable the council will encourage new housing to achieve the Lifetime Homes Standard (or any subsequent revised national standard). This is not a requirement; however larger sites of 10 dwellings or more will be expected to include a proportion of accessible homes as part of the overall housing mix.</p> <p>The additional cost of Lifetime homes has been tested in the Local Plan Viability Assessment. The additional cost is recognised by the council and the requirement in the further engagement draft for all homes to meet this standard has been removed. However it is still considered important for new homes designed to be accessible and easily adaptable</p> <p>The change proposed is not considered necessary as paragraph 5.3.140 clarifies these standards will be encouraged but are not mandatory.</p>	423 444
HO9	5. The Space Standards in Part E are unsound		105

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<p>HO9</p>	<p>5A. The Council has not provided any evidence to substantiate its choice of standards or why the Bradford area is sufficiently different to the rest of the country to apply such specific standards.</p> <p>Recommend Part E and associated references in the plan be deleted.</p>	<p>The council considers the policy as drafted is justified.</p> <p>In accordance with NPPF paragraph 50, the council should identify the size of housing that is required in particular locations reflecting local demand.</p> <p>The council considers the inclusion of a space standard to be justified by robust evidence of need and demand of specific groups in the district including older people, BME households and families identified in the SHMA as set out in Background Paper: 2. Housing.</p> <p>The standard has been tested in the Local Plan Viability Assessment in accordance with NPPF paragraphs 173-174.</p> <p>The council recognise the government housing standards review may introduce new national standards for housing. Therefore Policy HO9 also refers to any subsequent national standard to ensure the policy is flexible.</p> <p>It is therefore considered these standards are justified.</p>	<p>105</p>
<p>HO9</p>	<p>5B. The space standards listed don't take into account whether a home is built over 1, 2 or 3 storeys.</p> <p>The Council should look to amend these figures to take in account the differing space requirements for 1, 2 and 3 storey dwellings. The London Housing Design Guide gives Space Standards. Recommend that these figures be adopted as a minimum.</p>	<p>The council considers the policy as drafted is sound.</p> <p>The standards set out in the supporting text to Policy HO9 are considered an appropriate basis for assessing if homes provide minimum sufficient space. The standards chosen were developed and reviewed in 2007 by English Partnerships to ensure they were challenging but also viable and adjusted to the market. The standards are also broadly equivalent to the standards set out in the London Plan, which RIBA consider the best benchmark available for assessing if a home is large enough.</p> <p>The change proposed by the objector is not required to make the plan sound and the government housing standards review</p>	<p>390</p>

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		may introduce a new national space standard for housing. The Plan therefore also refers to any subsequent national standard to ensure the policy is flexible.	
HO9	<p>5C. The implications of requiring space standards will be to increase house prices to ensure that the additional costs of development are covered. The Council note in its background housing paper that the standards may not be feasible or viable. It is therefore queried how the Council can justify the inclusion of the standards</p> <p>Recommend Part E and associated references in the plan be deleted.</p>	<p>The cost implications of achieving space standards on financial viability have been tested in accordance with NPPF paragraphs 173-174, when setting the standards.</p> <p>The council do not consider the standards unjustified or too onerous as the standard is subject to viability/feasibility and if space standards are below those set out the onus is be on applicant to justify why development to these standards cannot be achieved. It is therefore considered these standards are justified and deliverable.</p>	105
HO9	<p>5D. Part E is unsound as it is unjustified; especially as Government has signalled the introduction of national space standards. There is little evidence to support this locally based standard and its introduction will be to detriment of house building in the area as the requirement to build larger homes will mean more expensive homes which will price individuals and families out of mainstream housing.</p> <p>The Council in fact note within its Housing Background Paper that these standards may indeed not be feasible or viable. It is therefore queried how</p>	<p>The council considers the inclusion of a space standard consistent with the approach in the Government's housing standards review</p> <p>The council recognise the government housing standards review may introduce new national standard for housing. Therefore Policy Ho9 also refers to any subsequent national standard to ensure the policy is flexible.</p> <p>In considering suitable space standards, the cost implications of achieving space standards on financial viability have been tested in accordance with NPPF paragraph 173-174.</p>	423 444

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	<p>the Council can justify the inclusion of such standards and as such they should be removed.</p>	<p>The council do not consider the standards unjustified or too onerous as the standard is subject to viability/feasibility and if space standards are below those set out the onus is be on applicant to justify why development to these standards cannot be achieved. It is therefore considered these standards are justified and deliverable.</p>	
HO9	<p>5E. Through the housing standards review government are considering the need or otherwise for national space standards. If such standards are required and justified these should be set at the national level and not on the whim of individual authorities.</p> <p>Recommend Part E and associated references in the plan be deleted.</p>	<p>The council considers the policy as drafted is sound.</p> <p>In accordance with NPPF paragraph 50, the council should identify the size type, tenure and range of housing that is required in particular locations reflecting local demand.</p> <p>The council considers the inclusion of a space standard consistent with the approach in the Government's housing standards review</p> <p>The council recognise the government housing standards review may introduce new national standard for housing. Therefore Policy Ho9 also refers to any subsequent national standard to ensure the policy is flexible.</p>	105
HO9	<p>6. Consider the plan unsound as paragraph B of policy H09 is contradictory. The Council will encourage all new housing to meet the highest possible sustainable design and construction standards but requires a standard that is not the highest and is subject to feasibility and/or viability'.</p> <p>Amend policy HO9 paragraph B to read: B The Council will encourage all new housing developments to meet the highest possible sustainable design and construction standards. The minimum acceptable standards with reference to the Code For Sustainable Homes or any national equivalent will be:</p>	<p>Policy HO9 states the council will encourage all development to achieve the highest possible sustainable construction standards which exceed the minimum. This is an aspiration and where it can be achieved the Council will encourage it. However, any minimum standard required must be viable under in accordance with NPPF paragraphs 173-174.</p> <p>It is considered that Criteria B achieves an appropriate balance of setting a local sustainability standard that supports climate change mitigation and the Council's carbon reduction targets, while taking into account economic viability and deliverability. This requirement is subject to feasibility and / or viability to ensure it does not impact on delivery.</p>	192

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	<p><input type="checkbox"/> Code Level 6 from the date of adoption, and <input type="checkbox"/> Zero Carbon Housing from 1st April 2016</p> <p>This amendment will eradicate the contradictory nature of the proposed plan.</p>	<p>It is considered the proposed change would be undeliverable based NPPF paragraphs 173-174 and the council’s viability evidence and the objector has not provided evidence justifying their comment.</p>	
<p>HO9</p>	<p>7. Welcome Policy HO9, but too many sections of the policy are open to subjective argument. Part B which appears to be binding and quantifiable but is “subject to feasibility and viability”,</p> <p>The scale of new development proposed over the plan period offers scope to transform the quality and energy performance of the building stock. But this that can only be achieved if Policy HO9 is implemented rigorously, quantifiably and without exception. As it stands it cannot be enforced or adequately monitored, and therefore it will be ineffective</p> <p>All sections of the policy should be modified to give references to national and international benchmark indicators, supported by District-wide targets.</p> <p>The ‘feasibility and viability’ let-out clause should be deleted from HO9(B).</p> <p>The policy should be reworded to require full conformity with all aspects of the policy, except in exceptional circumstances.</p>	<p>Comment of support for policy noted. It is considered that Policy HO9 provides a justified and effective approach to ensuring the quality of the future housing stock in line with NPPF.</p> <p>The council considers that Criteria B achieves an appropriate balance of setting a local sustainability standard that supports climate change mitigation and the Council’s carbon reduction targets, while taking into account economic viability and deliverability.</p> <p>Policy HO9 refers to standards based on National standards and refers to any subsequent national standards in accordance with NPPF paragraph 95.</p> <p>The standards identified in Policy HO9 are considered viable in the context of the district wide viability assessment. However there maybe some sites/circumstances where these standards cannot be achieved. Therefore, the requirements are subject to feasibility and / or viability to ensure the policy does not impact on delivery.</p> <p>It is considered the proposed change would be unsound and undeliverable based NPPF paragraphs 173-174 and the council’s viability evidence.</p> <p>The feasibility and viability clause is critical to ensure appropriate flexibility in line with NPPF.</p>	<p>393</p>

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<p>HO9</p>	<p>8. There is no reference to the need to provide renewable energy generation technology in new housing developments.</p> <p>Amend policy HO9 to include two new paragraphs: All new homes need to have south-facing or close to south-facing roofs wherever achievable in order to maximise solar gain and facilitate solar PV. All new homes need to have on-site renewable energy generation facilities to provide a minimum of 10% and a target of 30% of the properties needs. This can be provided within individual homes or on a development-wide basis and there should be an onus on the applicant to justify why a 30% target cannot be achieved.</p>	<p>NPPF paragraph 95 requires any local requirement for a building’s sustainability to be consistent with the Government’s zero carbon buildings policy and adopt nationally described standards.</p> <p>Renewable energy is covered by Code for Sustainable Homes/Zero Carbon housing part of the policy. It is considered that this approach is consistent with the Government’s zero carbon buildings policy and NPPF requirement to adopt nationally described standards in the NPPF.</p> <p>Under Criterion A all residential schemes are expected to be high quality and achieve good design. This is to be assessed though Building for Life 12, which includes site orientation and the potential for solar gain as part of BfL12 site assessment.</p> <p>Design Policy DS2 also requires schemes to work with the landscape to reduce the environmental impact of development. These policies are to be supported by the Residential Design Guide SPD, which is likely to provide further detailed guidance on this issue.</p> <p>It is considered the proposed change specifying all new homes need to have south facing rooms where achievable is unnecessary as this already covered by policy HO9 and DS2 and would result in unnecessary duplication.</p> <p>It is considered the proposed change requiring all new homes to have on site renewable energy generation facilities to provide a minimum 10% of the properties is unsound as it is not considered to be consistent with the Governments zero carbon buildings policy.</p>	<p>192</p>
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HO9	<p>9. The plan will lead to substandard housing being allowed, especially where developments are of less than 10 dwellings.</p> <p>Amend paragraph 5.2.141 to read: All new housing developments will be expected to meet Code for Sustainable Homes Level 6, and from 1st April 2016 all new housing must meet the Zero Carbon Homes standard or any national equivalent. If the proposed standards are below those set out in Policy HO9 then the onus will be on applicant to justify why development to these standards cannot be achieved.</p> <p>This amendment will ensure that all new developments are treated equally, irrespective of size, and that the highest possible standards are achieved.</p>	<p>It is considered that Policy HO9 provides a justified and effective approach to ensuring the quality of the future housing stock. The council considers that the policy achieves an appropriate balance of setting a local sustainability standard that supports climate change mitigation and the Council's carbon reduction targets, while taking into account economic viability and deliverability.</p> <p>Code Level 4 is proposed to only apply to major development in the district (10 dwellings or more) due to viability and deliverability issues, as the additional costs of attaining improved sustainable construction outcomes are best met by economies of scale. Larger developments can more easily meet the additional costs of attaining improved sustainable construction outcomes through economies of scale. Smaller developments are also more sensitive to variations</p> <p>Smaller scale developments will be encouraged to achieve the highest possible standards of sustainable design and construction and all homes will need to be built in line with the national sustainable housing requirements, as required through building regulations.</p> <p>It is considered the proposed change would be unsound in relation to NPPF paragraphs 173 and 174 and undeliverable based on the council's viability evidence.</p>	192
HO9	<p>10. Part G of Policy HO9 is ambiguously worded and gives no certainty to developers as to when this part of the policy will be applied. This part of the policy is deemed to be unjustified and ineffective.</p>	<p>Criterion G allows for further guidance on housing quality and design on an area or site basis to be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAP's and Neighbourhood Plans.</p> <p>It is considered this approach is justified and necessary for setting the approach in a strategic Development Plan Document for future site specific Development Plan</p>	396 397 400 402

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		Documents and Neighbourhood Plans.	
POLICY HO10 – OVERCROWDING			
HO10	1. Empty property in inner city areas in close proximity to employment sites should be dealt with as a matter of urgency. Private owners who cannot afford to bring property into adequate condition should be required to sell their property to others who have the wherewithal to create homes.	The comments are noted however there is no consequent need to amend Policy HO10. The Policy and supporting text set out the extensive measures which the Council are taking to tackle the problem of empty homes.	159
POLICY HO11 – AFFORDABLE HOUSING			
HO11	1. Delivery of sufficient affordable housing to meet identified need		
HO11	1A. The Core Strategy cites only up to 15% affordable housing in inner Bradford and Keighley, up to 20% in towns suburbs and villages and up to 30% in Wharfedale. The total housing allocation for Wharfedale is not a big enough proportion to bring the plan area's figure to anywhere near the 20-25% target	<p>Paragraph 47 states local authorities should use their evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with other policies set out in the NPPF. Policy HO1 sets out the Local Plan Housing requirement. The housing distribution has been arrived at based on a range of general principles as set out in Policy HO3 in section 5.3 of the Core Strategy.</p> <p>The overall affordable target of 20-25% is to be achieved by range of measures, which includes but is not limited to, developer contributions as set in paragraph 5.3.171 and Policy HO11.</p> <p>The council considers the affordable housing target and requirements to be justified in regards to meeting identified housing need and economic viability in accordance with NPPF paragraphs 47, 50, 173 and 174.</p>	79
HO11	1B. What proof can be put forward that the aim of	Policy HO11 has been informed by the evidence of housing	79

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	<p>Policy HO11 to 'ensure that there is a sufficient supply of good quality affordable housing throughout the district' can be met?</p>	<p>need in the SHMA and Local Plan Viability Assessment in accordance with evidence requirements as set out in NPPF paragraphs 50, 159, 173, 174.</p> <p>As set in paragraph 5.3.171 and Policy HO11. the overall affordable target is likely to be achieved through a range of measures including utilising funding sources to support the delivery of affordable homes, maximising opportunities offered by council owned land and through developer contributions.</p> <p>Section 6 of the Core Strategy sets out the approach to support the implementation and delivery of the Core Strategy policies. Policy ID1 states the Council will prepare an Annual Monitoring Report on a regular basis to report on the effectiveness of local plan policies and performance of Development Management. Annual affordable housing completions will be monitored through indicator IND5(H)</p> <p>It is therefore considered that Policy HO11 is fully justified and robust in delivering a sufficient supply of affordable housing throughout the district in line with NPPF.</p>	
HO11	<p>1C. The plan conflicts with NPPF paragraph 47 as there as there is no mechanism to enforce the affordable housing requirement</p>	<p>In accordance with NPPF paragraph 50, the council can set policies to meet identified affordable housing need on site. Policy HO11 requires an affordable housing contribution on housing schemes over a certain size threshold. The affordable housing requirements in different parts of the District are set out in Part B of Policy HO11.</p> <p>The council will seek affordable housing from residential developments in accordance with Policy HO11. In accordance with NPPF paragraph 50 affordable housing policies should be sufficiently flexible to take account of changing market conditions over time. Therefore the policy is subject to viability and the exact amount of affordable housing, or financial contribution, to be delivered will be determined</p>	<p>122, 142, 183, 336, 367, 370, 378 516</p>

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		<p>having regard to individual site and current market conditions. In such cases the council will expect a full development appraisal to be submitted as set out in Policy ID2.</p> <p>The main delivery mechanisms are set out in Policy HO11. The approach to Developer Contributions is set out in Policy ID3. Section 106 agreements are an established mechanism for securing affordable housing through development proposals.</p>	
HO11	<p>1D. There is concern, that affordable housing is often lost when dwellings are sold on. The need for affordable housing in Burley is a continuing one but achieving a 30% level within Wharfedale will pose major challenge as against a 15% target in inner Bradford and Keighley.</p>	<p>Comment noted. 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.</p> <p>Affordable housing targets and thresholds in Policy HO11 have been tested through the AHEVA (2010) and Local Plan viability Assessment (2013) in accordance with NPPF paragraph 173.</p> <p>It is considered that the affordable housing requirement for Wharfedale in Policy HO11 Part B is achievable and deliverable.</p>	445
HO11	<p>1E. Setting ‘up to’ targets are meaningless, because any rate of affordable housing delivery from zero upwards could be considered to comply.</p> <p>This problem is made worse by the ‘subject to viability’ clause. It is therefore impossible to see how the 20-25% district-wide target is to be achieved. The policy will be ineffective and should therefore be considered unsound</p> <p>‘Up to’ targets in HO11(B) should be replaced with ‘at least’.</p>	<p>The overall affordable target is to be achieved through a range of measures including utilising funding sources to support the delivery of affordable homes, maximising opportunities offered by council owned land and through developer contributions.</p> <p>In accordance with NPPF paragraph 50 the council can set policies to meet identified housing need on site. However, affordable housing targets should be set at a level which is viable, in accordance with the NPPF paragraph 173.</p> <p>It is not considered justified to set affordable housing requirements in Part B to ‘at least’ as this could exceed the identified housing need and potentially render the requirement</p>	394

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	<p>The 'subject to viability' in HO11(B) should be deleted, and replaced by a statement along the lines that 'Provision of affordable housing at less than the target rate will only be permitted in exceptional circumstances where a development proposal otherwise considered to offer excellent contribution to sustainable development would be compromised by the financial implications of meeting the target.'</p> <p>HO11(E) should be reworded to reflect the suggested amendment to HO11</p>	<p>unviable as there would be no upper limit on the policy.</p> <p>NPPF paragraph 50 requires affordable housing policies to be sufficiently flexible to take account of changing market conditions over time. In accordance with the NPPF the affordable housing requirement is subject to viability to ensure it does not restrict deliverability as recommended in the Local Plan viability Assessment (2013).</p> <p>As set out in paragraph 5.3.176 where there is evidence that a site would be unviable if affordable housing targets are required then the exact amount of affordable housing, or financial contribution, to be delivered will be determined by economic viability having regard to individual site and current market conditions. In such cases the council will expect a full development appraisal to be submitted for validation as set out in Policy ID2.</p> <p>It is considered the proposed change would be unsound in terms of compliance with NPPF paragraphs 50, 173- and undeliverable based upon the council's viability evidence.</p>	
HO11	<p>1F. The Policy will not provide the number of affordable dwellings that the Bradford district needs.</p> <p>Amend Policy HO11 Affordable Housing section B to read: The council will negotiate for up to the following proportions of affordable housing on residential developments: <input type="checkbox"/> Up to 30% in Wharfedale <input type="checkbox"/> Up to 25% elsewhere</p> <p>This amendment gives the Council the right to expect developers to provide the sort of housing that the district requires.</p>	<p>It is considered that Policy HO11 is robust in delivering a sufficient supply of affordable housing throughout the district and the affordable housing requirements are set at a viable level in accordance with NPPF paragraphs 50 and 173.</p> <p>The overall affordable target will be achieved by range of measures including utilising funding sources to support the delivery of affordable homes, maximising opportunities offered by council owned land and through developer contributions.</p> <p>In accordance with NPPF paragraph 50 the council can set policies to meet identified housing need on site. Affordable housing targets must be set at a level which is viable, in</p>	192

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		<p>accordance with the NPPF paragraph 173. The affordable housing requirements in Part B have been informed the Local Plan Economic Viability Assessment.</p> <p>It is considered the proposed change would be unsound and undeliverable based NPPF as it is not supported by viability evidence as required by NPPF paragraphs 173/174</p>	
HO11	<p>1G. There is a shortfall of suitably sized accommodation in Bradford for tenants of social housing, so that under current government rules, some people are under occupying their accommodation.</p> <p>Councils are able to bid for funding from Central Government to support the shortfall of appropriate housing to help people to downsize where appropriate. The Draft Core Strategy should identify and account for the possibility of applying for such funding to meet housing shortage in this sector.</p>	<p>Policy HO11 identifies that the council will work with partners to ensure that there is a sufficient supply of good quality affordable housing distributed throughout the district, particularly in the areas of highest need</p> <p>Para 5.3.172 states grant funding and any other forms of subsidy and funding for affordable housing should be directed towards development in the areas of highest need.</p> <p>It is considered the Core Strategy provides sufficient scope for applying for future funding to meet identified housing needs as appropriate for a strategic Development Plan Document.</p>	113
HO11	<p>1H. There is a history of not delivering of new and affordable homes preventing a choice in the market place</p>	<p>The council will seek affordable housing from residential developments in accordance with the stated thresholds and percentages as set out in Policy HO11. The threshold has been reduced to 5 dwellings in Wharfedale which is likely to support the delivery of more affordable homes in this area.</p> <p>The main delivery mechanisms for Policy HO11 are set out on page 198 of the Core Strategy. The approach to Developer Contributions is set out in Policy ID3</p> <p>It is considered that the policy is sound and approach is likely to deliver an appropriate range of housing in accordance with NPPF paragraphs 50 and 159.</p> <p>The District's published AMRs sets out the past delivery of both market and affordable housing.</p>	437

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HO11	11. “There seems to be no requirement for the building of affordable housing in the plan”	<p>It is considered that the plan as drafted is sound and the approach to affordable housing is in accordance with NPPF paragraphs 47, 50 and 159.</p> <p>Policy HO11 requires an affordable housing contribution on housing schemes over a certain size thresholds. The affordable housing requirement in different parts of the district are set out in Part B.</p> <p>It is considered that the plan as drafted is sound and the approach to affordable housing is in accordance with NPPF paragraphs 47, 50 and 159.</p>	104, 107, 480
HO11	2. The levels of affordable housing are not justified by the Council's own evidence and will render the plan undeliverable.		
HO11	<p>2A. Support a variable affordable housing target across the plan area to take account of variable economic viability. However, the percentages suggested are not supported by the viability evidence in the Local Plan Viability Assessment (2013) and are therefore considered unsound.</p> <p>The plan must, deliver from the date of its adoption. Therefore that the targets are unsound and will have a detrimental impact upon the delivery of the plan.</p> <p>Once the cumulative impact of all plan policies and obligations are considered a significant proportion of development within the area will be compromised.</p> <p>This is a significant issue which the Core Strategy must address as failure to do so will render the plan undeliverable. To accord with NPPF paragraphs</p>	<p>In accordance with NPPF paragraph 47 the council should use their evidence base to ensure that their Local Plan meets needs for affordable housing in the housing market area, as far as is consistent with other NPPF policies.</p> <p>Affordable housing targets and thresholds in Policy HO11 have been tested through the AHEVA (2010) and Local Plan viability Assessment (2013) in accordance with NPPF paragraph 173.</p> <p>The SHMA identifies that the greatest housing need is from the city of Bradford. However the council recognise that there are viability issues within this area. The requirement is therefore set below the overall target of 20-25% in inner Bradford and Keighley to reflect the viability issues identified in the AHEVA 2010 and Local Plan Viability Assessment.</p> <p>The council recognise in Core Strategy Paragraph 5.3.172 that given pressures upon development viability in parts of the main urban areas, in order to meet the overall district wide</p>	105

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	<p>173 to 177 the Council should review all of its policy requirements to ensure that they do not unduly burden development.</p> <p>The majority of sites will require a viability negotiation process which will ultimately slow down development. Support of Part E but it should not be used to retain an unsustainable policy. The Council must ensure that its policies are viable in the majority of cases with 'open-book' assessments retained for special cases only.</p> <p>Recommend the affordable housing contributions be lowered to accord with the Council's own evidence. This will need to include a zero requirement within inner Bradford and Keighley. If the market improves sufficiently for the Council to justify the affordable housing contributions currently sought, it can seek a full or partial review of the plan at that time.</p>	<p>affordable housing target, grant funding and any other forms of subsidy and funding for affordable housing should be directed towards development in the areas of highest need.</p> <p>The policy is subject to viability to ensure it does not restrict deliverability and is sufficiently flexible to take account of changing market conditions over time in accordance with NPPF paragraph 50.</p> <p>It is considered the proposed change would not comply with NPPF given the scale of housing need, as evidenced in the SHMA. A zero target in these areas will result in the Local Plan not meeting the identified affordable housing need in the areas it is most needed.</p> <p>It is considered that Policy HO11 achieves an appropriate balance of setting affordable housing policy requirements at a level which will help meet the overall need for affordable housing across the district, while taking into account economic viability and the need to be sufficiently flexible to take account of changing market conditions over time.</p> <p>The council therefore consider the targets in policy HO11 to be fully justified and in conformity to the NPPF paragraphs 47, 50 and 173-174.</p>	
HO11	<p>2B. Policy HO11 is unsound as the Local Plan Viability Assessment clearly demonstrates the targets are unviable when assessed alongside other plan requirements.</p> <p>Including targets which can only be met in peak market conditions cannot be justified and places an onerous burden for applicant's to prepare viability assessments when it is known the targets cannot be met.</p>	<p>See previous response to 2A.</p> <p>In addition despite viability evidence indicating the highest value areas, such as Wharfedale are able to withstand higher affordable housing impacts, the target for Wharfedale has been reduced from the Core Strategy FED to 30% to reflect the latest evidence of housing need.</p> <p>Given the scale of need it is not considered justified to reduce affordable housing targets that are considered viable. The</p>	396 397 400 402

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	<p>Support the flexible approach proposed within the policy, it is maintained the figures should be reduced in Wharfedale and inner Bradford and Keighley to reflect the Council's evidence base which demonstrates the targets proposed in these areas are unviable.</p>	<p>council therefore consider the proposed change to reduce the figure for Wharfedale is not justified by evidence.</p>	
HO11	<p>2C. Based on the Local Plan Viability assessment 2013 the current proposals for affordable housing render developments in all areas apart highest value market areas as unviable even in the event of a significant pick-up in the market.</p> <p>This situation deteriorates further when the cumulative impact of the Core Strategy policies are taken into account with the Local Plan Viability Assessment stating: This further reinforces that the policy as drafted is unsound.</p> <p>Whilst the policy allows for negotiation on the amount of affordable housing to be provided on a case by case basis, as it currently stands, this would require the majority of schemes to go through this process which will further delay the delivery of housing.</p> <p>The Council should seek to reduce affordable housing levels to align with the viability assessment and to introduce</p>	<p>See previous response to 2a</p> <p>In addition the council consider the proposed change to introduce further flexibility and allow for the payment of commuted sums towards affordable housing is considered unnecessary as Part B of Policy HO11 already includes reference to off-site provision or a financial contribution where robustly justified.</p>	423 437 444
HO11	<p>2D. The proposal to locate affordable housing in Wharfedale is unrealistic and unjustifiable. The difference between property prices in Wharfedale and those in the rest of the District is such that it is not feasible or justifiable to locate affordable housing in the area.</p>	<p>It is considered the plan as drafted is justified</p> <p>In accordance with NPPF paragraph 47 the Local Plan must meet the full needs for market and affordable housing within the housing market area. NPPF paragraph 50 states the council can set policies to meet affordable housing need on</p>	88, 488

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		<p>site.</p> <p>Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Affordable rent is up to 80% of the market rent. Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels.</p> <p>The council will seek to ensure an appropriate mix of affordable housing in terms of size, type and tenure having regard to robust evidence of local need, site suitability and viability. As stated in paragraph 5.3.175 the final mix should have regard to the evidence of the SHMA, site suitability and any other relevant, robust and up to date evidence of local needs and/or economic viability. This approach allows for tenure to be determined on a site by site basis with regard to local evidence.</p> <p>It is considered that Policy HO11 achieves an appropriate balance of setting affordable housing requirements at a level which will help meet the overall need for affordable housing across the district, while taking into account economic viability, affordability and overall housing distribution.</p> <p>The council therefore consider the targets in policy HO11 to be justified and in conformity to the NPPF paragraphs 47, 50 and 173-174.</p>	
HO11	2E. Due to higher land values, affordable housing will only be viable in Bradford	<p>The council disagree with the comment.</p> <p>The targets in Policy HO11 have been tested through the AHVEA and Local plan Viability Assessment.</p> <p>The viability evidence indicates the highest value areas, such</p>	205, 254, 289, 329, 335, 336

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		<p>as Wharfedale are able to withstand higher affordable housing impacts.</p> <p>The council therefore consider the target for Wharfedale is deliverable and viable in accordance with NPPF paragraphs 173-174.</p>	
HO11	<p>3A. Concern that provision of affordable applying to sites of 5 dwellings in Haworth will have viability and thus deliverability implications even if that is provided by off-site contributions. Especially as South Pennines area is not identified in the highest values in terms of market housing.</p>	<p>Affordable housing targets and thresholds in Policy HO11 have been tested through the AHEVA (2010) and Local Plan viability Assessment (2013) in accordance with NPPF paragraph 173. The AHEVA (2010) identified a threshold of 5 dwellings was deliverable in values areas 1-4</p> <p>Paragraph 5.3.174 states on smaller sites a commuted sum may be appropriate where this is justified by viability issues. The commuted sum is also subject to viability in order to ensure it does not impact on deliverability and is sufficiently flexible to take account of changing market conditions over time in accordance with NPPF paragraph 50.</p> <p>The council therefore do not consider the affordable housing threshold in Haworth to be unjustified and undeliverable.</p>	108
HO11	<p>3B. The general proportions set out in part B of the draft policy are supported on the basis that these are treated as maxima and allowance is made for viability appraisal where these targets cannot be met.</p> <p>The reduction of the affordable housing dwelling numbers threshold in Wharfedale and certain other villages from 15 dwellings to 5 dwellings is unrealistic and will act as a major deterrent to the delivery of smaller site by small builders.</p> <p>It is important following the recession to encourage</p>	<p>Support for Part B noted.</p> <p>Affordable housing targets and thresholds in Policy HO11 have been tested through the AHEVA (2010) and Local Plan viability Assessment (2013) in accordance with NPPF paragraph 173. The AHEVA (2010) identified a threshold of 5 dwellings was deliverable in values areas 1-4</p> <p>Paragraph 5.3.174 states on smaller sites a commuted sum may be appropriate where this is justified by viability issues. The commuted sum is subject to viability to ensure it does not impact on deliverability and is sufficiently flexible to take account of changing market conditions over time in accordance with NPPF paragraph 50.</p>	447

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	small house builder performance to deliver on these small and often difficult sites .	The affordable housing threshold is considered to be deliverable and appropriate checks and balances are included within the policy to ensure development is not prevented.	
HO11	3c. what happens in regards to tenure mix on sites where only 1 affordable unit would be required e.g in Haworth on a site of 5 units only 1 would be affordable and the type of affordable could impact on the value of the market properties undermining overall site viability.	<p>It is recognised that on small sites the preferred tenure mix may not be deliverable. As stated in core strategy paragraph 5.3.175 the final mix should have regard to the evidence of the SHMA, site suitability and any other relevant, robust and up to date evidence of local needs and/or economic viability.</p> <p>In addition paragraph 5.3.174 states on smaller sites a commuted sum may be appropriate where this is justified by viability issues. The commuted sum is subject to viability to ensure it does not impact on deliverability and is sufficiently flexible to take account of changing market conditions over time in accordance with NPPF paragraph 50.</p> <p>The council consider this approach to be appropriate as it provides flexibility to negotiate the tenure mix on a site by site basis and takes into account site suitability and viability in line with NPPF.</p>	108
HO11	4. Policy HO11 does not take into account local affordable housing need.		
HO11	<p>4A. Welcome the building of Affordable Housing to meet local needs of the area, however Policy HO11 does not meet actual local area need but rather the financial contribution to provide for the District's need. The result of this policy, is that new Affordable Housing is likely to not go where it is needed but where it can be best funded.</p> <p>Policy HO11, unless in balance with local need, will unsustainably entice people out of Bradford, or elsewhere who have no family, no work or no other connection in within Wharfedale. The consequence</p>	<p>Support for building affordable housing to meet local needs noted.</p> <p>The council consider the policy as drafted is sound.</p> <p>In accordance with NPPF paragraph 47 the council should use their evidence base to ensure that their Local Plan meets needs for affordable housing in the housing market area, as far as is consistent with other NPPF policies. Based on the housing requirement the SHMA identifies an overall affordable target of 20-25% across the District.</p>	135, 342

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	<p>is that these residents will be heavily subsidised to live on an estate many miles from their employment, families or adequate social facilities. This is unsustainable.</p> <p>Unless these residents travel to work by the ever increasing cost of trains, they will be forced to use carbon unfriendly cars on already over congested roads.</p>	<p>The affordable housing proportions in Policy HO11 Part B are based on evidence of housing need as identified in the SHMA and economic viability, in accordance with NPPF paragraphs 50, 159, 173 and 174.</p> <p>The justification for the 30% affordable housing requirement in Wharfedale reflects two further factors, firstly affordability and secondly housing distribution and the likely number of opportunities to secure affordable housing contributions.</p> <p>The relatively more acute affordability issues in Wharfedale, together with the strategic emphasis in the plan to limit the level of allocations for housing development there for sustainability reasons, means that the level of affordable housing required is only likely to be delivered if a higher percentage target than other parts of the District is applied.</p> <p>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.</p> <p>The majority of new homes proposed in the Core Strategy housing distribution (Policy H03) are in the Regional City of Bradford and the principle town of Keighley. Therefore, even though in percentage terms the affordable housing requirement is lower in these areas, the potential total number of affordable homes delivered through developer contributions will be much greater in these areas.</p> <p>Policy HO11 has not been driven solely by economic viability. Despite viability evidence indicating the highest value areas such as Wharfedale are able to withstand higher affordable housing impacts, the target for Wharfedale has been reduced to 30% to reflect the latest evidence of housing need across</p>	
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		<p>the district.</p> <p>It is considered the affordable housing requirements are justified and based on robust evidence in accordance with the NPPF.</p>	
HO11	<p>4B. The cost of rent or equity purchase in Wharfedale is in excess of the market prices elsewhere in the District. Thus if there is not a clearly defined local need Bradford Council will be using critical funding to move other District residents to Wharfedale with at best no financial benefit to themselves.</p> <p>A 30% requirement for Menston is arguably well in excess of local requirements. If the council through their own research's confirmed Menston and Wharfedale would be overprovided by affordable houses if Part B is applied then the excess could be translated into affordable dwellings or funding elsewhere in the District.</p> <p>As the funds released for each un-required dwelling in Wharfedale may be up to twice that elsewhere in the District, Bradford District would benefit from having up to twice as many such dwellings being built in areas of actual need and sustainability, a win-win situation.</p> <p>Policy HO11 and in particular part B needs rewording to reflect the essential point that the presumption is that new developments need to contribute to robustly evidenced local need and surplus requirements to Affordable Housing Targets used to fund similar housing elsewhere in the District.</p>	<p>Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Social 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>In accordance with NPPF paragraph 47 the council must use their evidence base to ensure that their Local Plan meets needs for affordable housing in the housing market area, as far as is consistent with other NPPF policies. Based on the housing requirement the SHMA identifies an overall affordable target of 20-25% across the district. The SHMA identifies a need for affordable housing across all sub areas of the Bradford district. Menston is located in the Wharfedale subarea.</p> <p>To support mixed and sustainable communities Affordable housing should be provided on-site unless off-site provision or a financial contribution can be robustly justified and would support the creation of inclusive and mixed communities in accordance with NPPF paragraph 50.</p> <p>The council do not consider the proposed approach to using offsite contributions from Wharfedale to fund affordable housing in other areas of the district sound as this approach is unlikely to support mixed communities or meet tests for seeking planning obligations set out in NPPF paragraph 204</p>	135, 488

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		<p>which require planning obligations to be directly related to the development proposed.</p> <p>It is considered that Policy HO11 achieves an appropriate balance of setting affordable housing requirements at a level which will help meet the overall need for affordable housing across the district, while taking into account economic viability, affordability and overall housing distribution. The council therefore consider the targets in policy HO11 to be justified and in conformity to the NPPF paragraphs 47, 50 and 173-174.</p>	
HO11	<p>4C. Concern that preferred tenure mix, of 70:30 social/affordable rent: has no drafted guidelines on the criteria which would influence the flexibility to the proposed tenure. This is needed to ensure local housing demands are met with more certainty than currently the case.</p> <p>The statement in para 5.3.175 of one size fits all should be redrafted to recognise more definitively that different presumptive ratios may be appropriate based on local housing and employment circumstances together with some indicative guidelines supporting how these changes may be justified. Without such redrafting the flexible presumptions in Para D are undermined by the content of para 5.3.175</p>	<p>The council will seek to ensure an appropriate mix of affordable housing in terms of size, type and tenure having regard to robust evidence of local need, site suitability and viability.</p> <p>The preferred tenure mix of 70:30 social/affordable rent: intermediate is the starting point for all affordable housing negotiations. As stated in paragraph 5.3.175 the final mix should have regard to the evidence of the SHMA, site suitability and any other relevant, robust and up to date evidence of local needs and/or economic viability.</p> <p>The proposed change is not considered to be required and would not make the plan clearer. It is considered that the policy is flexible and allows for evidence of viability and local need to be taken account of in the determination of the final tenure split to be delivered. This approach allows for tenure to be determined on a site by site basis with regard to local evidence.</p>	135 342
HO11	<p>4D. Employment (and land for employment) in Ilkley is limited since the Railway Road (new Tesco site) was lost from employment to retail. Consequently there is a minimal need and demand (as opposed to desire) for affordable housing in Ilkley</p>	<p>The objector has provided no evidence to support their comment regarding the level of affordable housing need.</p> <p>The SHMA identifies a need for affordable housing across all sub areas of the Bradford district.</p>	170

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		<p>Ilkley is considered a principle town in the Core Strategy settlement hierarchy. Principle towns fulfil a District wide role as service, employment and transport hubs. In addition Retail is considered as economic development under the NPPF (annex 2 Glossary).</p> <p>It is therefore considered there is an identified need for affordable housing in Wharfedale and that there will be a range of employment opportunities which will be accessible to future residents in Ilkley, including those living in affordable housing.</p>	
HO11	4E. The supply and provision of affordable homes should be dependent on demand for such homes which will vary throughout the district.	<p>It is considered the affordable housing requirements are justified and based on robust evidence in accordance with the NPPF.</p> <p>Based on the housing requirement the SHMA identifies an overall affordable target of 20-25% across the district. The SHMA identifies a need for affordable housing across all sub areas of the Bradford district.</p> <p>The affordable housing requirements in Policy Ho11 Part B are based on evidence of housing need as identified in the SHMA and economic viability, in accordance with NPPF paragraphs 50, 159, 173 and 174.</p> <p>Viability evidence indicates that the highest value areas, such as Wharfedale, are able to withstand higher affordable housing impacts; however the target for Wharfedale has been reduced to 30% to reflect the latest evidence of housing need.</p>	170
HO11	4F. The policy suggests of up to 30% of affordable housing on residential developments in Wharfedale without any evidence of demand or need as to how this figure is arrived at.	<p>In accordance with NPPF paragraph 47 the Local Plan must meet the full needs for market and affordable housing within the housing market area. Based on the housing requirement the SHMA (2013) identifies an overall affordable target of 20-25% across the district. The SHMA identifies a need for</p>	3, 6, 51, 73, 132 119,, 170171, 177, 184, 213 239, 292, 336, 365,

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	<p>The Strategic Housing Market Assessment suggests a district wide target of 20%-25% and Policy HO11 B sets a target of up to 20% in towns, suburbs and villages. Yet Inner Bradford and Keighley where there is greater demand for larger family homes have a target of 15% for affordable housing.</p> <p>100 ha employment expansion is projected in Bradford (Policy EC3) thus creating a demand for affordable housing.</p> <p>Statistics would seem to show a greater need for affordable housing in Inner Bradford, Shipley and Keighley where employment is to be focussed.</p> <p>The affordable housing requirement for Wharfedale therefore conflicts with paragraph 88 of the NPPF emphasising the policy to minimise the need to travel.</p>	<p>affordable housing across all sub areas of the Bradford district.</p> <p>The affordable targets in Policy HO11 are based on evidence of housing need and economic viability in accordance with NPPF paragraphs 47, 50 173 and 174. The justification for 30% requirement in Wharfedale reflects two further factors, firstly affordability and secondly likely levels of land supply and therefore the likely number of opportunities to secure affordable housing contributions.</p> <p>The relatively more acute affordability issues in Wharfedale together with the strategic emphasis in the plan to limit the level of allocations for housing development there for sustainability reasons, means that the level of affordable housing required is only likely to be delivered if a higher percentage target than other parts of the District is applied.</p> <p>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.</p> <p>The majority of new homes proposed in the Core Strategy housing distribution (Policy H03) are in the Regional City of Bradford and the principle town of Keighley. Therefore, even though in percentage terms the affordable housing requirement is lower in these areas, the total number of affordable homes delivered through developer contributions will be much greater in these areas.</p>	372
HO11	4G. Where does the ratio of 30% affordable housing come from? Where is the evidence to support this figure? Addingham’s demographic is an ageing population. So who needs the affordable housing?	In accordance with NPPF paragraph 47 the Local Plan must meet the full needs for market and affordable housing within the housing market area. Evidence of housing need has been assessed by the SHMA in accordance with NPPF paragraph 159.	179

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		<p>The affordable requirement in Policy HO11 are based on evidence of housing need and economic viability in accordance with NPPF paragraphs 47, 50 173 and 174</p> <p>The justification for the 30% target in Wharfedale reflects two factors, firstly affordability and secondly likely levels of land supply and therefore the likely number of opportunities to secure affordable housing contributions.</p> <p>The relatively more acute affordability issues in Wharfedale together with the strategic emphasis in the plan to limit the level of allocations for housing development there for sustainability reasons, means that the level of affordable housing required is only likely to be delivered if a higher percentage target than other parts of the District is applied.</p> <p>It is considered the affordable housing requirements are justified and based on robust evidence in accordance with the NPPF.</p>	
HO11	4H. Building subsidised housing in Wharfedale cannot be justified on the grounds that it meets a highly localised need in the immediate area. Silsden, which is only 3.2 miles from Addingham and 6 miles from Ilkley, falls into Area 3 in terms of the property values described in the AHEVA and has lower priced properties available for sale.	See previous comment (4g)	488
HO11 / Wharfedale sub area	4I. Affordable homes are needed in Ilkley as new homes will be very expensive and out of reach of the majority of people.	<p>Comment noted.</p> <p>The council agree there is a need for affordable homes across the district as identified within the SHMA and set out in Policy HO11.</p>	270, 275, 296, 314, 368, 384, 398, 410, 418
HO11 (B) / Wharfedale sub area	4J. Affordable housing should be 40-50% in line with Harrogate	<p>The council considers the policy as drafted is sound</p> <p>The affordable requirements in Policy HO11 are based on</p>	246

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		<p>evidence of housing need and economic viability in accordance with NPPF paragraphs 47, 50 173 and 174.</p> <p>There is no justification for adopting targets in line with Harrogate as these have been informed by Harrogate’s own evidence and housing market area</p> <p>The proposed change is not supported by viability evidence or evidence of housing need.</p>	
HO11 / Wharfedale sub area	4k. “There is a need for new housing in Ilkley for lower income families but the plan does not explain how this would work”	<p>Comment noted. The council agree there is plan recognises there is a need for affordable homes across the district.</p> <p>The overall affordable target is likely to be achieved through a range of measures including utilising funding sources to support the delivery of affordable homes, maximising opportunities offered by council owned land and through developer contributions.</p> <p>The council will seek affordable housing from residential developments in accordance with the stated thresholds and percentages as set out in Policy HO11.</p> <p>The main delivery mechanisms for Policy HO11 are set out on page 198 of the Core Strategy. The approach to Developer Contributions is set out in Policy ID3</p> <p>It is considered that the policy is sound and approach is likely to deliver an appropriate range of housing in accordance with NPPF paragraphs 50 and 159.</p>	119, 437
HO11	6. Support the inclusion of allowing developers to demonstrate viability regarding the delivery of affordable housing. We also support that the policy includes that provision is “up to” the relevant percentage thresholds. We would however suggest	<p>Comments of support noted.</p> <p>It is unclear what changes to the map are suggested to make it clearer.</p>	188

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	that a clearer map is provided at figure HO2		
HO11	7. There should be a policy specifically for first time buyers in Ilkley	<p>The council consider the plan as drafted is sound.</p> <p>Delivering sufficient affordable housing in accordance with Policy HO11 and meeting the needs of people on lower incomes and first time buyers is identified as a strategic priority</p> <p>Affordable housing requirements are set out in Policy HO11 part B.</p> <p>It is therefore considered that the proposed change is unnecessary and is not in itself required to make the plan sound.</p>	236
HO11	8. “An explanation of what Affordable Housing is and costs should be included”	Affordable housing is defined in the Core Strategy Appendix 1 and NPPF Annex 2: Glossary. It is therefore considered that the proposed change is unnecessary and would add unnecessary duplication	118, 119, 225
HO11 / Wharfedale sub area	1. The plan conflicts with NPPF paragraph 54 as it does not take account of rural areas / rural need.	<p>The council disagree that the plan conflicts with NPPF paragraph 54.</p> <p>Policy HO11 Parts F and G set out the affordable housing policy in relation to rural areas. This includes the approach to rural exception sites in accordance with NPPF paragraph 54.</p>	142
HO11 / Strategic Housing Market Assessment	1A. The SHMA document contains inconsistencies and inaccuracies in the figures given at different points and query some of the modelling and calculations used in the underpinning research.	<p>It is considered that the Core Strategy is based on robust evidence and data, including the SHMA 2013 and Housing Requirements Study.</p> <p>The SHMA was prepared in accordance with national planning policy and guidance. The SHMA was updated in 2013 to provide an up to date and robust evidence of housing need. The Core Strategy Publication draft has been informed by the SHMA update report 2013. In addition the Council has commissioned an independent Housing Requirement Study</p>	488

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		which considers the latest Government issued household projections. The Core Strategy Publication Draft has also been informed by this work and its conclusions.	
HO11	2A. In its treatment of Wharfedale the report departs clearly from the evidence. The report combines Wharfedale (Area 1 in terms of AHEVA property prices) with Craven (Area 3) and persistently calls the combined area 'Wharfedale'. This is misleading	<p>It is considered that the plan is justified and based on robust evidence and data.</p> <p>The SHMA identifies that there are a number of sub areas within the District which exhibit broadly similar housing market characteristics</p> <p>AHEVA value areas were based on research using Land Registry data at a Postcode Sector level</p> <p>The SHMA has informed the approach to housing need and demand. The AHEVA has informed the understanding of viability of affordable housing across the district.</p> <p>The approach to how the evidence base has informed policies is set out in section 2 evidence of Background paper Housing (part2)</p>	488
HO11 / AHEVA	1A. Query some of the modelling and calculations used in the underpinning research.	<p>The AHEVA 2010 was based on detailed research and evidence which was tested with stakeholders in line with planning guidance and best practice,.</p> <p>It is considered that the Core Strategy is based on robust evidence and data, including the AHVEA and more up to date evidence of viability in the Local Plan viability Assessment.</p>	488
POLICY HO12 – GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE			
Support for the Policy.			
HO12	1. We support the requirement that proposals for sites for gypsy and travellers should avoid significant adverse effects upon the environment.	Support noted and welcomed.	103
HO12	2. We are pleased to see that our previous comments have been taken on board and included	Support noted and welcomed.	493

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	<p>within the latest iteration of the Core Strategy and we offer our full support to these, in particular Policy HO12 – Sites for Travellers and Travelling Showpeople: inclusion of avoiding areas at high risk of flooding.</p>		
APPENDIX 6 – HOUSING IMPLEMENTATION & DELIVERY			
<p>1. Housing Trajectory / Table 2</p>	<p>1. As there has been an under delivery of housing in Bradford Council area over at least the last 5 years the NPPF requires the shortfall +20% is made up in the immediate (0-5 year) time frame yet Table 2 seems to spread the shortfall across the plan period and mainly toward the mid/late end not now.</p>	<p>The Council has worked under the assumption that the trajectory required by Government to be included in the plan should reflect the realities of likely delivery. The Council has taken a realistic approach to what is likely to be delivered over the next 5 years and this includes evidence from the SHLAA and from developers such as the likely annual rate of completions achievable in what they describe as relatively weak market conditions.</p> <p>If this is not what the Government intends i.e. the trajectory does not have to reflect likely delivery, then an alternative trajectory can easily be substituted in Appendix 6 which reflects the annual housing requirement of 2200 dwellings together with the relevant backlog and 20% buffer.</p> <p>To be clear it is not the Council’s policy to hold back development to the rate set out in the table and graph – allocated sites or windfall sites may come forward or be developed at a faster annual rate of completions than currently envisaged. However the table and graph do reflect what the Council considers can be achieved in the first 5 years of the plan period given the nature of the local economy, the land supply in place at the moment and the fact that a new Allocations DPD - which will be needed to make up the shortfall in the 5 year land supply - will not be in place for at least 2 years. There will then be a further period during which sites will need to secure planning permission and be prepared before units on those sites begin to come on stream.</p>	<p>108, 423, 444, 439</p>

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		The housing requirement is set out in Policy HO1 and the plan proposes sufficient land to be allocated in the first phase to more than meet the required 5 year land supply including both backlog and buffer (see the Council's response to Policy HO4 objections).	
1. Housing Trajectory / Table 2	2. The nature of the current implementation strategy is unnecessarily constraining housing delivery earlier on in the plan period by allowing an average of 2,288 dwellings per annum from 2015/16 to 2022/23 and then 'ramping up' house building later on in the plan period to an annual average of 3,571 dwellings from 2023/24 – 2029/30	This is incorrect – the housing trajectory within the Core Strategy is an estimation of expected delivery, not a policy as is very clearly explained in the supporting text. There is nothing in the housing trajectory to limit development to a specific rate.	423, 444
1. Housing Trajectory / Table 2	3. Objection to phasing on the basis of the housing trajectory in Appendix 6. This suggests that the housing backlog in the district will only be resolved at the end of the plan period.	The housing trajectory is not a policy or proposal. There is enough land proposed for release under the phasing approach to meet both the need for new homes at 2200 in addition to the backlog.	129, 439
1. Housing Trajectory / Table 2	4. Appendix 6 of the Core Strategy provides a housing trajectory which broadly splits the delivery in the following way: <ul style="list-style-type: none"> • 2015/16 – 2022/23 = 18,300 dwellings • 2023/24 – 2029/30 = 25,000 dwellings 	The housing trajectory is not itself a policy and therefore does not prevent development sites coming forward of development occurring at a faster rate than indicated. It is simply an attempt to estimate the reality of when and at what pace actual delivery may occur given the nature of the economy and housing market at the outset and the inevitable time it will take to get a new plan, an increased land supply in place. If is considered that the trajectory should simply be a graph of the annual housing target set across the plan period then such a trajectory graph can be inserted as an alternative.	423, 444, 439
2. Table 3	1. The housing delivery parameters seem to focus on PDL as the focus for delivery but given the under delivery these last 5 years + the first priority should be to apply NPPF paras 14 and 47. Not consistent with national policy. Not justified, not sound.	The Council considers that the delivery parameters are appropriate and reflect the content and policies of the plan.	108

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Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue)</i>	Council's Response	Respondent
EN1	Open Space, Sports and Recreational		
EN1	1. Support for policy and soundness of policy.	Support is noted.	103
EN1	<p>2. Future pitch provision must be related to the site specific action plan within the emerging Playing Pitch Strategy (PPS). This will show which existing sites in each sub area require improvements to create the capacity to accommodate the additional demand from local housing developments. The PPS will also identify sites or areas of search for new playing field provision to support housing growth. The proposals map cannot be updated until the PPS has been finalised.</p> <p>Sport England is involved in the preparation of the Council's emerging Playing Pitch Strategy. An Assessment Report has been prepared and the Strategy Report is underway at the time of writing. However, the findings of the Assessment have not been used to help inform the relevant policies and open space standards contained within this plan.</p>	<p>It is acknowledged that work is ongoing in making links between the need to accommodate growth and implications for future pitch provision and this will clearly be of great benefit. The outputs of the playing pitch strategy will be used to feed into work on preparing the Allocations DPD, into decision-making relating to individual sites, into wider work to review the open space assessment and into work on green infrastructure.</p> <p>The findings of the emerging playing pitch assessment and strategy have not fed directly into the text of the core strategy due to timescale issues and due to the fact that the policy represents an overview of the councils responsibilities for the provision of open space at a strategic level. Outputs will however be used to inform later work, as stated above.</p>	200

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<p>EN1</p>	<p>3. Sport England consider inappropriate and out of date evidence has been used to justify sport and recreation related policies (EN1) and the open space standards set out in the Appendix 9. It is considered the lack of up to EN1 Part F - open space standards for outdoor sport are not appropriate to determine needs.</p> <p>The following amendments are requested: EN1 part C – add a new bullet point to ensure the pitch provision is linked to the Playing Pitch Strategy Action Plan to avoid unsustainable single pitch sites. Suggested wording: “A contribution to the provision of off-site playing field improvements or new sites as identified in any up to date Playing Pitch Strategy Action Plan.” This will provide a clear link between the housing site and the playing field site required to accommodate the additional demand arising from the housing development.</p> <p>EN1 part F – add a second part to separate out the pitch sport requirements. As identified earlier quantity, quality and accessibility standards are inappropriate for pitch provision. Provision should be based on the Playing Pitch Strategy Site Specific Action Plan. Suggested wording: “Pitch sport provision will be developed through the Playing Pitch Strategy and identified in the Local Plan.”</p>	<p>The standards are based upon the KKP open space Assessment. In this respect they are evidenced. While it is recognised that the study is several years old it provides a robust start point for the standards. As noted above the Council has been in a process of updating its playing pitch strategy and supporting evidence.</p> <p>In relation to the amendments proposed, as the later stages of the playing pitch strategy work were not available at the stage when policies were formulated and this is a strategic level document which addresses different forms of open space provision, the policy is considered to be sound. However, minor amendments on the lines of those suggested could provide further updating and clarity in relation to this issue.</p>	<p>200</p>
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	Main Mechanisms – remove reference to Sport England Toolkit and replace with Playing Pitch Strategy.		
EN1	4. Concern is expressed about a lack of commitment to improving the quantity and quality of open space, particularly in relation to standards of open space, lack of open space and missed opportunities to improve open space in Menston.	It is considered that the policy provides a robust strategic decision-making framework in relation to the protection and improvement of open space and recreation facilities. It is hoped that further work on reviewing the open space assessment and provision of green infrastructure and ecological networks will raise the profile of open space within the district. While greenfield development should provide opportunities to improve open space, decisions on particular sites will be dependent on management and resources.	342
EN1	5. Specific opportunities need to be identified to improve GI and open space.	The core strategy is a strategic level plan. Opportunities will be identified to improve GI and open space through preparation of the Allocations DPD. Broad opportunities are identified in SC6 relating to green infrastructure and in the environment section of the sub-area policies.	371
EN1	6. Policy EN1 should ensure natural greenspace, required to mitigate the effects of increased recreational pressure upon the South Pennine Moors is delivered through a supporting Supplementary Planning Document. Whilst the	Whilst the current policy is considered to be sound as it already makes reference to the need to divert recreational pressure away from the South Pennine Moors, it is considered that the paragraph identified	513

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	<p>requirements of the HRA are identified in paragraph 5.4.22, given the consequences of not delivering alternative greenspaces (non-compliance with the habitats regulations and failure to deliver the housing policies), the policy should include the following paragraph:</p> <p><i>“Mitigating Recreational Pressure In accordance with policy SC8, residential developments which contribute to recreational pressure upon the South Pennine Moors Natura 2000 site will be required to mitigate these effects through provision of new recreational natural greenspaces, contributions to off-site natural greenspaces or improvements to existing open spaces. The requirements and delivery of these natural greenspaces will be set out in the XXX Supplementary Planning Document.”</i></p>	<p>could be added to policy EN1 at the end of c:</p> <p><i>In accordance with policy SC8, residential developments which contribute to recreational pressure upon the South Pennine Moors Natura 2000 site will be required to mitigate these effects through provision of new recreational natural greenspaces, contributions to off-site natural greenspaces or improvements to existing open spaces. The requirements and delivery of these natural greenspaces will be set out in the South Pennine Moors zone of influence Supplementary Planning Document.”</i></p>	
Policy EN2	Biodiversity and Geodiversity		
EN2	<p>1. This policy does not include a criteria for the protection or enhancement of Sites of Special Scientific Interests (SSSIs). Bradford has four SSSI, including the South Pennine Moors, Bingley South Bog, and Trench Meadows. These may be joined by other sites during the plan period.</p> <p>Whilst the moors are also internationally</p>	<p>Support is noted.</p> <p>Although policy EN2 is considered to be sound, as core strategies should not generally seek to repeat national guidance, it is considered that a minor amendment could be made to EN2 below A, as follows:</p> <p>Sites of Special Scientific Interest</p>	513

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	<p>protected, the interest features for the SSSI include a wider variety of breeding birds and habitats. Consequently developments may not affect the SAC/SPA but have adverse effects upon the SSSI.</p> <p>Policy EN2 should ensure that SSSI interest features are protected in accordance with paragraph 118 of the NPPF. This is required to ensure the Core Strategy distinguishes between internationally, nationally and locally protected sites.</p> <p>Natural England welcomes and supports the designation of areas shown to support feeding SPA birds as local wildlife sites. This complies with the NPPF's requirement to enhance the biodiversity network and BAP.</p>	<p>Development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Scientific Interest (either individually or in combination with other developments) should not normally be permitted.</p>	
EN2	<p>2. The plan should place more stress on the need for close co-operation between the potentially competing interests on the moors: grouse shooting, habitat restoration and species diversification, countryside leisure, sheep farming, water gathering and cultural tourism.</p>	<p>The point is noted as an important one. It is considered that the issue is covered in its broadest sense in paragraphs 5.4.61 – 5.4.64 and the plan is considered sound as drafted. However a more specific reference to the need for co-operation between competing interests could be included as a minor amendment.</p>	62
EN2	<p>3. There is mention of ecological network plans on paragraph 5.4.98, but it is not clear as to their</p>	<p>Ecological networks will be taken forward in relation to habitats functionally linked to</p>	497

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	status, whether they will be incorporated into Development Plan Documents for planning areas within the District and whether they are a recognition solely of the current situation, or include targets sufficient to offset impacts on the SAC/SPA.	the SPA/SAC and through further work on green infrastructure. Targets might be a useful element in future implementation work.	
EN2	4. The present wording of Policy EN2 is not legally compliant as it fails to reflect the provisions of Article 6(4) Habitats Directive as implemented by regulations 103 and 105 of the 2010 Regulations.	The HRA conclusions have been reviewed and those contained in the Revised HRA (December 2014) are now considered to be compliant with the Conservation of Species and Habitats Regulations 2010. It is also considered that the current wording of policy EN2 is fit for purpose.	423, 447 & 495
Policy EN3	Historic Environment		
EN3	1A. Maintaining the status of the World Heritage Site should be a priority of the plan	Support, noted.	69
EN3	1B. Support for this policy in relation to development in Addingham	Support, noted	111
EN3	1C. Support for preservation of Victorian townscape	Support, noted	170
EN3	1D. welcome appropriate policies related to the protection and enhancement of the natural and built heritage of your area and more specific the conservation and enhancement of designed landscape and historic parks and gardens of the location whether registered or not. We would highlight the significant contribution that designed landscape, parks and gardens, singly or comprehensively, listed or not make an important contribution to our countryside, villages, towns and cities.’	Support, noted	210

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EN3	2. Suggest an addition to include support for local listings and protection of Conservation Fringes	Criterion F and supporting text 5.4.76 and 5.4.77 adequately covers the approach to local listings and non designated heritage assets. Similarly settings of conservation areas already a Planning consideration and adequately considered in existing wording of policy and supporting Conservation Area assessments.	159
EN3	3. The plan does not protect heritage assets and their setting in accordance within paragraph 128 of the NPPF (Issue in relation to application off Coutances Way).	The Policy is considered in compliance with NPPF in protecting heritage assets. Paragraph 128 of NPPF relates to detailed considerations relevant to a planning application.	142, 333, 336, 370
EN3 / Haworth	4. Consider the designation of Haworth as a World Heritage Site as part of Bradford's Tourism Strategy	Previously considered and nomination failed to achieve first stage acceptance. The designation of World Heritage site is not a matter for the Local Plan and subject to separate processes.	114
EN3	5. Given the number of heritage assets and the importance of Bradford's historic environment, it is essential that the Core Strategy sets out a robust framework for the conservation and management of this resource. Once this plan is adopted, Policy EN3 will be the only one against which proposals affecting the historic environment will be assessed. policy framework in the Local Plan. As such concern is raised as to the approach which will be taken to applications affecting non designated archaeological remains.	Criterion F and related supporting justification at paragraphs 5.4.76 to 5.4.78 recognise the importance of non designated heritage assets including archaeology and the requirements for applicants to provide supporting heritage statement. The Policy as drafted is considered sound. A minor amendments could be made to set out more detail as the approach but would not be required to make the policy sound. The Council acknowledge the typographical	103

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	<p>In order to provide a clear indication of how a decision maker should react to a development proposals affecting non-designated archaeology, the Local Plan needs to set out the approach which the Council will adopt when considering such proposals.</p> <p>An additional Criterion to Policy EN3 and some consequential amendments to the justification are proposed:</p> <p>1. Criterion D, Typographic error. This should read:- “use of a Listed Building should be retained”</p> <p>2. Criterion E, Typographic error. This should read:- “The alteration, extension.””</p>	<p>errors and suggest these can be addressed through a minor amendment.</p>	
EN3	<p>6 Support for the inclusion within section C5 of the heritage assets associated with the structures and character of the Leeds and Liverpool Canal. This will require development proposals to conserve and enhance the heritage significance and setting of the canals heritage assets.</p>	<p>Support, noted</p>	<p>165</p>
EN3	<p>7. Suggest an amendment is made to policy in order to allow new uses of historic buildings to support the aims and objectives of the Core Strategy, i.e. to support housing growth and support the re-use of previously developed buildings.</p>	<p>The policy is considered to be sound and adequate as worded, without need for amendment.</p> <p>The policy needs to read with the other policies of the Plan which supports the reuse of</p>	<p>188</p>

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		buildings including those that are listed for a range of uses. Further work outside the Local Plan is being undertaken in partnership with English Heritage to support re use of listed buildings including a the introduction of a possible Local Listed Building Consent Order.	
Policy EN4	Landscape		
EN4	1. Support for policy.	Noted.	513, 210
EN4	2. Support for policy, particularly criterion B2	Noted	103
EN4	3. Support for the landscape character, woodland and potential and actual recreational importance of the Tong Valley.	Support is noted. The importance of the Tong Valley is identified in the Bradford sub-area policy, environment section.	130
EN4	4. Concern is expressed about the impact of the Holme Wood urban extension on the landscape, countryside, green belt, woodland and ancient woodland there. There is a conflict between the urban extension proposal and this policy, particularly in relation to trees and woodland.	The importance of the Tong Valley is identified in the Bradford sub-area policy, environment section. Within the context set by EN4 the identification of important elements in the landscape needs to be taken into account in work to inform the Allocations DPD.	194
Policy EN5	Trees and woodlands		
EN5	1. Support for the policy, however in element c should needs to be replaced by shall to make the policy more robust.	It is considered that the policy is sufficiently robust.	170
EN5	2. Strong support for the policy. The Woodland Trust wish to work with the Council on developing an access to woodland standard.	Support is noted and the commitment to future partnership working.	164

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Policy EN6	Energy		
EN6	1. Support for policy.	Support is noted.	123
EN6	2. Greater emphasis on the climate change issue is needed, particularly in relation to reducing CO2 emissions. The emphasis should be on mitigation, rather than adaptation, and improving insulation. There is a need to reduce energy imports and increase emphasis on community led and owned wind turbines rather than 'commercial wind'. There is a need for a new section on climate change.	It is considered that the existing section on climate change and resource use linked to Strategic Core Policy 2 addresses the issues raised. B identifies key strategic issues in relation to supporting the Council's carbon reduction targets. The importance of community led projects is identified in B3. The policy identifies key issues and areas of ongoing work within the Council to address such important issues. As a strategic level policy it cannot identify all areas of ongoing work.	5
EN6	3. EN6 should make reference to the guidance note produced by West Yorkshire Ecology on small wind turbines.	This is considered to be too detailed an issue to warrant inclusion in a core strategy policy.	34
EN6	4. Objection to part B i.e. the need to 'ensure that development will have no adverse impact on the integrity of the South Pennine Moors SAC/SPA'.	Part B is necessary to ensure that the policy responds to the issues raised in the Habitats Regulations Assessment and is in compliance with the Conservation of Species and Habitats Regulations 2010.	496
EN6	5. The policy is considered to be unsound as the NPPF requires that local authorities design policies to maximise renewable development and the group is not convinced that this is reflected in Bradford's core strategy. There is no target for renewable energy capacity. Concern is expressed about the extent of green	The policy is considered to be in keeping with paragraph 97 in the NPPF, which requires that policies are designed to maximise renewable and low carbon energy whilst ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual	55

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	belt coverage within the district and the need to identify special circumstances in relation to the siting of turbines within the green belt.	impacts. It is also in accordance with recent guidance issued by the government. The need to demonstrate very special circumstances to allow projects to proceed within the Green Belt is part of national planning policy and is set out in paragraph 91 of the NPPF.	
EN6	6. Paragraph 5.3.104 states that account is taken of local requirements, feasibility and viability: this is very vague and should be clarified, or else removed. Latest planning guidance for wind farms permits consideration to be given to the expected energy contribution of a project, but the NPPF also confirms that small scale projects should be supported. The reference to “local requirements”	It is not clear which paragraph numbers or which document is being referred to here. The Environment Section is numbered 5.4. Paragraph numbers in the Energy section run from 5.4.115 – 5.4.131.	55
EN6	7. Paragraph 5.3.112 suggests that the Wharfe and Aire valleys have special landscape value and are inappropriate for siting of wind turbines. However, we support some wind turbine or wind farm development, sensitively designed, in these areas. Until recently the Wharfe Valley had a wind farm at Chelker Reservoir, in full view from the Cow and Calf, which in our opinion sat very sympathetically in the landscape. So a policy against wind turbines in these areas is not justified, given actual experience.	It is not clear which paragraph numbers or which document is being referred to here. The Environment Section is numbered 5.4. Paragraph numbers in the Energy section run from 5.4.115 – 5.4.131. Sensitively designed and located proposals are encouraged rather than precluded, in keeping with recent government guidance.	55
EN6	8. Paragraph 5.1.105 is factually incorrect , the	It is not clear which paragraph numbers or	55

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	<p>consultation zone for wind turbine proposals is 15 km, not 30 km (this is the advisory zone). In fact, Knabs Ridge wind farm is operating without any problems for the airport, at a distance of ~19 km.</p> <p>5.3.103 is factually incorrect, it should refer to the “high pressure gas grid” rather than “the gas grid” as anaerobic digestion projects generally connect with the <i>intermediate</i> gas grid.</p> <p>5.3.104 should be removed.</p> <p>5.3.112 should have most of the sentences removed, leaving just “Proposals will need to have an assessment of environmental, economic and social impacts.”</p>	<p>which document is being referred to here. The Environment Section is numbered 5.4. Paragraph numbers in the Energy section run from 5.4.115 – 5.4.131. It is therefore very difficult to respond to comments.</p>	
EN6	9. Support for criterion B and the need for assessment of environmental impacts including cumulative landscape and visual impacts.	Support is noted.	103
EN7	Flood Risk		
EN7	1. Support for the policy and it is noted that comments from the previous consultation have been taken on board.	Support is noted.	493
EN7	2. The policy is supported but Yorkshire Water should be identified as having a lead role.	Support is noted. Whilst the current policy is sound, it is considered that Yorkshire Water could be identified as having a lead role.	123
EN7	3. Concern is expressed about commitment to the application of EN7 A7 and whether this was properly applied in relation to sites in Menston.	The comment relates to a specific application and not to the content of the policy. EN7 is a strategic level policy and	342

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		full implementation may be dependent on more detailed guidance and resources.	
EN7	4. Flood risk issues in relation to ground water and surface water are not being addressed in accordance with the NPPF.	EN 7 has been prepared in compliance with the NPPF to allow all forms of flood risk to be adequately addressed. However this is a strategic level policy and full implementation may be dependent on more detailed guidance.	70, 135
EN8	Environmental Protection Policy		
EN8	1. Strong support for policy but request that amenity be added to part C of the policy.	Support is noted. Whilst the current policy is considered sound, it is considered that a minor amendment as suggested could be made adding amenity to element C as below: ‘Proposals for development must identify potential nuisance and amenity issues’ Though this minor change is not considered required to make the plan sound.	123
EN8	2. The policy is supported. It is noted that comments from previous consultations have been taken on board.	Support is noted.	493
EN8	3. Support for the overall policy, however criterion B is considered to be partially deficient in relation to the area of unstable land. Paragraph 003 of Section 45 (Land Instability) of the new National Planning Practice Guidance, makes it clear that Local Plans should ensure that unstable land is appropriately	The policy was prepared in light of National Policy and in response to earlier consultation comments. It is considered to be sound as drafted. However the minor amendments could be made and would	80

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Section 5 – 5.4 – Environment

	<p>remediated.</p> <p>Criterion B whilst going so far, does not address the issue of remediation in relation to unstable land, although it does for contamination. To be effective and to be fully consistent with national policy, minor wording amendment to criterion B is necessary.</p> <p>Change Requested – The Coal Authority would suggest the following change to criterion B of Policy EN8: <i>“B. Land Proposals for development of land which may be contaminated or unstable must incorporate appropriate investigation into the quality of the land. Where there is evidence of contamination <u>or instability</u>, remedial measures must be identified to ensure that the development will not pose a risk to human health, public safety and the environment. Investigation of land quality must be carried out in accordance with the principles of best practice.”</i></p> <p>Support for the inclusion of unstable land as a consideration in accordance with previous comments.</p>	<p>provide further clarity but are not considered required to make the policy sound.</p>	
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**Appendix 7L – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 5 – 5.5 – Minerals**

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised (Separate row for each issue/sub issue)	Council's Response	Respondent
Policy EN9	New Minerals Extraction Sites		
EN9	1. The policy does not provide adequately for the protection of heritage assets.	The Council considers that the policy as drafted is sound. The change proposed by English Heritage may make the policy clearer but is not in itself required to make the policy sound as it is implicit within the policy that both heritage assets and their setting would be protected. No reasonable interpretation of policy EN9 as drafted could lead to the conclusion that there is no need to consider the impact of minerals development on heritage assets. Policy EN9 also needs to be read with the other policies of the plan including EN3.	103
Policy EN11	Sand, Gravel, Fireclay and Coal Supply		
EN11	1. We consider the plan to be unsound in that it will not protect the people of the District from the adverse effects of shale gas extraction by hydraulic fracturing.	The Council considers that the policy as drafted is sound. Adopting a negative policy towards the extraction of oil or gas by hydraulic fracturing would be contrary to the national planning policy position on minerals extraction set out in the NPPF. There is not considered to be any overriding justification for such a policy position based upon local circumstances or environmental constraints.	192
EN11 (C)	2. Criterion EN11 (C2) is superfluous and inconsistent with the NPPF which does not require policies to consider the availability of a market or the quality of energy minerals.	The Council considers that the policy as drafted is sound. The change proposed by the Coal Authority may make the consistency of the policy with the NPPF clearer but is not in itself required to make	80

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		the policy sound as the NPPF does not prohibit Council's from stipulating criteria relating to the quality of coal reserves. The Council considers that the proposed deletion of criterion EN11 (C2) would have very little practical consequence as proving the quality and quantity of a mineral reserve is a routine part of the Development Control process.	
EN11 (D)	3. The wording of criterion D is such that it does not clearly apply to hydrocarbons extracted by unconventional means.	The Council considers that the policy as drafted is sound. The proposed change is not required and would not make the policy clearer. Commercially extracted hydrocarbons comprise coal, oil or gas. Criterion C applies to coal whereas Criterion D applies to oil and gas. The policy's supporting text makes it entirely clear that the scope of Criterion D includes oil and gas extracted by any means, be it conventional or unconventional.	80
Policy EN12	Minerals Safeguarding		
EN12	1. The policy does not adequately provide for the safeguarding of sandstone resources due to the excessive scope of criterion EN12B4.	The Council considers that the policy as drafted is sound. The wording of criterion EN12 (B4) as drafted makes it clear that a resource could only be built upon where a requirement for the resource's extraction would prejudice the development, i.e. render it unviable. Where a minerals resource is abundant, such as undifferentiated sandstone, it is the Council's view that the primary objective of a safeguarding policy should be to stimulate prior extraction rather than stifle surface development. Criterion EN12 (B4) ensures that the safeguarding policy will not unnecessarily stifle development within the MSA.	103

**Appendix 7M – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 5 – 5.6 – Waste Management**

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue)</i>	Council's Response	Respondent
Policy WM1	Waste Management		
WM1	1. Support for Policy	Noted	190
WM1	2. Lack of a household waste recycling site in Menston results in residents needing to use a site in Otley, which is outside the Bradford Local Authority Area. However, access is limited resulting in fly tipping in Menston. Policy WM1 should include the need to form agreements with neighbouring authorities.	<p>Specific legal agreements with other local authorities are considered outside the remit of the Local Plan and are an issue for the waste Authority as part of its operational decisions.</p> <p>WM2 covers matters relating to working with neighbouring local authorities within the remit of Strategic Planning for waste management.</p> <p>Policy SC3 relates to strategic planning and working with other bodies. The Duty to Cooperate Statement sets out work on planning related matters including Waste Management.</p>	135, 342
WM1 (Marked as WD1)	3. The waste recycling point in the centre of Ilkley seems out of place in a residential area where the access roads are double parked for much of the time that the collection point is open. Consideration should be given to a new site with easy access out of the town centre such as the water treatment area off Coutances Way.	Policy WM1 deals with the strategic management of waste relating to the waste hierarchy, not specific local needs. Any future need for household waste recycling sites or their relocation will be dealt with on a site by site basis. This will be undertaken by the council's waste services when considering the future planning and provision of council run household recycling sites, and not through the Local Plan: Core Strategy.	156

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Policy WM2	Waste Management		
WM2	1. Support for Policy	Noted	190
WM1 / WM2	2. Waste Management Strategy should be revised based on combined heat/power plants and transport requirements	The Waste Management DPD has considered a number of sites across the District. The assessment of these sites has included their potential to be developed to combined heat / power waste facilities and impacts upon the transport network.	485

**Appendix 7N – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 5 – 5.7 – Design**

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised (Separate row for each issue/sub issue)	Council's Response	Respondent
Policy DS1	Achieving good design		
DS1	1. Ilkley Design Statement (IDS) should be added to the list of documents in paragraph 5.7.6	Paragraph 5.7.6 lists the relevant supplementary planning documents (SPDs) formally adopted by the Council. It is not an exhaustive list of all documents which may be material considerations.	170
	2. Support for the policy.	Noted	103, 434
	3. Large developments must be rigorously master planned and exemplary in terms of design, green infrastructure and other sustainability criteria and planned with full community involvement.	The policy seeks to achieve good design, including through working with the community (criterion C) and taking a comprehensive approach to development (criterion F). The supporting text (paragraph 5.7.15) identifies master planning as a tool for this on large developments. Other policies in the plan deal with green infrastructure (SC6, DS2) and with sustainability criteria (SC2, EC4 and HO9)	394
Policy DS2	Working with the Landscape		
DS2	<i>No written representations were attributed to this Policy</i>	N/A	N/A
Policy DS3	Urban Character		
DS3	1. Support for the Policy	Noted.	103, 170
Policy DS4	Streets and Movement		
DS4	1. Only Brownfield in town sites should be developed suggest detailed consideration of development in Keighley and impact on River Worth.	Other policies in the plan deal with the location of new development and brownfield sites (see SC4, SC5 and HO6). It is noted that a network of routes already exists. The policy seeks to ensure that new development where it	371

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Section 5 – 5.7 – Design

		occurs retains and provides new links into existing routes.	
Policy DS5	Safe and Inclusive Places		
<i>DS5</i>	<i>No written representations were attributed to this Policy.</i>	<i>N/A</i>	<i>N/A</i>

**Appendix 70 – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 6 – Implementation and Delivery**

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue.)</i>	Council's Response	Respondent
Policy ID1	Development Plan Documents and Annual Monitoring Report		
ID1	1. This is the first mention that Neighbourhood Plans should be in general conformity with Core Strategy DPD. This in our view needs to be made clearer earlier in the document.	<p>Section 1 sets out the family of Bradford Local Plan Document in line with the approved Local Development Scheme.</p> <p>Policy ID sets out the key roles and relationships between the Core Strategy and other layers of the development plan. The Core Strategy needs to be read as a whole and duplication has been kept to a minimum.</p> <p>The change proposed may make the approach and relationship clearer but it is not in itself required to make the plan sound. No change to Policy ID1</p>	108.
ID1	2. Acknowledgement should be made to the role Bolton Woods Quarry in delivering homes and jobs in the Shipley Canal Road Corridor. The Core Strategy should include specific reference Bolton Woods Quarry and continued dialogue with the landowner.	Bolton Woods Quarry Site is a Strategic Housing Land Availability Site (SHLAA) and detailed reference has been made to this site within the Shipley & Canal Road Corridor AAP – Issues and Options Report (2013). The Council recognises that key sites, such as Bolton Woods Quarry may have opportunities for a mix of land uses in additional to housing including employment and supporting local shops and services. It is not appropriate or necessary to make specific mention of this site	407.

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		within the policy or supporting text. The Shipley & Canal Road Corridor AAP will be subject to separate consultation and landowner engagement where the site specific issues will be considered in detail.	
ID1	3. Policy ID1 makes clear that the Shipley & Canal Road Corridor Area Action Plan DPD will support the work of the Joint Venture to deliver the proposals for New Bolton Woods. The support of the Council in delivering the proposals is extremely welcome by Canal Road Urban Village Limited (CRUVL).	Noted.	510.
ID1	4. Policy ID1 suggests that the Council will prepare a further four DPDs along with Neighbourhood Plans. The uses of SPD's should be minimal (Provision B) and it is welcomed that these will not be used to add further financial burdens. Provision C seeking clarity of whether the Annual Monitoring Report will be prepared on an annual basis.	<p>The Council in accordance with the NPPF paragraph 153 is preparing the four Local Plan DPDs which have been clearly justified through the Local Development Scheme which was approved by the Council Executive at the meeting on 14 July 2014.</p> <p>The Council is committed to keeping the number of SPDs to a minimum as outlined in the Local Development Scheme. The Council is committed to providing guidance and support to community groups preparing Neighbourhood Plans where proposed.</p> <p>The Council recognises the importance of publishing up to date monitoring reports in accordance with the NPPF and National Planning Guidance. The Council will therefore look to publish the AMR on an annual basis.</p>	512.

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Policy ID2	Viability		
ID2	1. Para 6.15 requires developers to meet the costs of the Council’s valuer in looking a viability appraisals. This should say ‘reasonable’ costs.	Agree with proposed change.	108
ID2	2. In principle support this policy approach but consider that the viability assessment and / or information provided should be proportionate to the scale of the development/variation. 2a. Paragraph 6.15 suggests that any viability assessment will be assessed by an independent valuer, the cost of which will be met by the developer. On this basis it is important that the developer has the opportunity to select and vet any “independent” valuer and the cost of their advice	Support for policy approach noted. Agree that the supporting text should include reference that viability assessment/information submitted should be propionate to the scale of the development/variation. The Council will set out the detailed requirements for submitting viability assessments through further guidance to ensure consistent decisions can be taken and appropriate weight accorded to viability considerations	512
ID2	3. At current development costs and housing sale values development is not viable across much of the City of Bradford 3a. Policy ID2 is not sufficient to address this lack of viability	The council recognise that delivery of the Core Strategy will be challenging and the viability issues that exist across some parts of the district. The Core Strategy therefore includes a range of policies and identifies a range of funding, delivery models and approaches to support implementation and delivery. The approach to housing delivery is set out Housing Implementation and Delivery Strategy (Appendix 6) The NPPF para 174 requires Local Plans to facilitate development throughout the economic cycle. Policy ID2 sets out the Council’s approach for considering viability issues in the determination of planning applications where	157

**Appendix 7O – Summary of Comments Received and Council Response to the Publication Draft Consultation
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		<p>site specific circumstances mean that a scheme will not be able to be developed viably with the policy requirements in the Local Plan. Policy ID2 will support the delivery of development in the Local Plan; however the policy not intended to address all the viability and deliverability issues associated with the Core Strategy.</p> <p>It is considered strategic approach and range of policies set out in the Core Strategy are justified and will be effective in ensuring delivery of sustainable development over the plan period in accordance with NPPF paragraph 182.</p> <p>Policies ID4, ID5, ID6 and ID8 seek to ensure that developments and associated infrastructure is facilitated by the Council and its partners using a range of funding and delivery models as appropriate.</p>	
ID2	4. Support the inclusion of Policy ID2 as it will allow developers who are progressing schemes on sites with abnormal costs, such as redeveloping listed buildings, to able to demonstrate viability throughout negotiations with the Council	Support for inclusion of policy noted.	188
ID2	5. The consideration of viability is essential in order to ensure the deliverability of schemes. Supports the Council's approach to ensuring that viability is taken into account where a variation to planning policy requirements or planning obligations is proposed.	Support for inclusion of policy noted.	510

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Section 6 – Implementation and Delivery**

Policy ID3	Developer Contributions		
ID3	1. With reference to Paragraphs 6.25/6.26 and ID3 and Policy HO4 C6, will new infrastructure be dependent on private sector development coming forward?	<p>The Council has prepared a Local Infrastructure Plan (LIP) which acts as a key evidence base to inform the Core Strategy. The LIP has highlights relevant infrastructure issues and provides a capacity assessment i.e. what infrastructure are there and what will be required to support development over the Local Plan period and how it could be implemented (through a detailed Infrastructure Delivery Schedule). It is envisaged that new infrastructure is delivered using a combination of public and private sector funding to enable developments in key housing and economic growth areas such as the urban extension at Holme Wood.</p> <p>Further work may also be required to understand how gaps in funding can be resolved and the mechanisms by which the Council and its partners can secure public and private financing. This work will involve appraising existing funding streams and evaluating the use of alternative mechanisms such as the Community Infrastructure Levy (CIL).</p> <p>In partnership with all public and private infrastructure partners, the future need and delivery of new infrastructure will be explored and site opportunities for new or enhanced infrastructure will be identified through the other DPDs.</p>	108.

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	<p>1a. With reference to viability, infrastructure contributions should be proportionate and reasonable</p>	<p>Planned infrastructure is set out in the Infrastructure Delivery Schedule of the LIP. This will be updated by the Council when necessary in order to reflected future plans and programmes of key infrastructure providers.</p> <p>The Council is aware of the requirement of NPPF Paragraphs 173 to 177 in ensuring that viability and costs is fully considered in plan making and decision taking. A Viability Assessment of the Core Strategy policies has been undertaken in order to ensure that the plan is deliverable. The Viability Assessment includes test sampling a range of housing and employment sites across the Bradford District in accordance with National Planning Practice Guidance ‘Viability’ paragraphs 5 – 15. The Council understands the district wide infrastructure development costs (in line with NPPF Paragraph 177) and has produced a detailed Infrastructure Delivery Schedule as part of the Local Infrastructure Plan with indicative costs and timescales for delivery and potential funding sources.</p>	
<p>ID3</p>	<p>2. Propose an amendment to Part A of the policy so that the “nature” of a development is considered as well as the scale and form of development. As such, the “nature” of an existing building i.e. Listed, would be considered within the context of viability throughout Section 106 negotiations. Part A of ID3 should therefore be amended to read “scale, form and nature of development”.</p>	<p>The policy as drafted is sound. National Planning Practice Guidance on ‘Viability’ at paragraph 13 recognises listed buildings as an abnormal cost. The minor amendment proposed may make the policy clearer but it is not in itself required to make the plan sound.</p>	<p>188.</p>

**Appendix 70 – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 6 – Implementation and Delivery**

ID3	<p>3. As part of the development delivery mechanism, the Canal Road Urban Village Private Partner Urbo has capped profit and this together with controlled land values creates a mechanism for maximising the amount of financial surplus available for various regeneration objectives.</p> <p>CRUVL request that the submission version of the Core Strategy acknowledge this and that in specific case it precludes the need to establish such contributions as may be required for development generally.</p>	<p>Policy ID3 will be applied consistently to all developments in the Bradford District. The policy as written allows for the nature of regeneration and development funding models to be a material consideration when determining planning applications, including developer contributions.</p>	510.
ID4	Working with Partners		
ID4	<p>1. Yorkshire Water (YW) as statutory water and sewerage undertaker is pleased that the Plan recognises that “new development, redevelopment and the intensification of existing activities can all generate additional demand for infrastructure including... and utilities infrastructure. The Plan is correct in its assertion that it is vital that there is sufficient infrastructure to support the Core Strategy’s policies.</p> <p>YW strongly supports Policy ID4 and welcomes the statement in paragraph 6.35.</p> <p>YW are committed to working with Bradford and other partners as appropriate in the preparation of an Infrastructure Delivery Schedule.</p>	<p>Support for Policy ID4 and paragraph 6.35 is noted.</p>	123.

**Appendix 7O – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 6 – Implementation and Delivery**

ID6	Simplification of Planning Guidance to Encourage Sustainable Development		
ID6	1. It seems counterintuitive to introduce a policy to suggest that the Council will simplify guidance, particularly when its goes onto to list various planning documents which may be used. This policy is unnecessary and should be deleted.	The Council is already using a number of tools to simplify planning guidance including use of LDOs and Planning Performance Agreements. This policy therefore underlines the commitment by the Council to continue to simplify and speed up the planning system to encourage development an economic growth. Policy ID6 complies with the NPPF and the Localism Act 2011.	512.
ID7	Community Involvement		
ID7	1. Support Community Involvement policy.	Noted.	170

Appendix 7P – Summary of Comments Received and Council Response to the Publication Draft Consultation
Section 7 – Monitoring

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue)</i>	Council's Response	Respondent
Section 7	Monitoring		
<i>Section 7</i>	<i>No written representations were attributed to this section of the Plan.</i>	<i>N/A</i>	<i>N/A</i>

Appendix 7Q – Summary of Comments Received and Council Response to the Publication Draft Consultation Appendices

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue.)</i>	Council's Response	Respondent
Appendix 4	Car Parking Standards		
Appendix 4	1. Appendix 4 for Car Parking Standards does not include the sui generis category and therefore ignores Bradford's theatres.	Noted. If and when car parking issues arise relating to any of land uses contained within the Sui Generis category of the Use Classes Order they will be dealt with on their individual specifications and considerations such as number of potential users and proximity to public transport etc. The Core Strategy does not have the scope to contain parking standards to cover every possible proposal, location and intensity of use which may come forward during the plan period	126

**Appendix 7R – Summary of Comments Received and Council Response to the Publication Draft Consultation
Publication Draft – Policy Omissions**

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised (Separate row for each issue/sub issue.)	Council's Response	Respondent
Policy Omissions	Policy Omissions		
Community Facilities	<p>Not compliant with NPPF (paragraphs 70 and 156) and objective 10 does not follow through in terms of policies in the plan.</p> <p>Propose new policy to safeguard community facilities.</p>	<p>The approach to provision of community facilities is covered by several policies including the sub area policies which have been informed by the Local Infrastructure Plan. It is not considered appropriate or necessary to have a specific detailed policy.</p> <p>Detailed provision of new sites for community facilities will be dealt with in the more detailed allocating DPDs to follow.</p>	126
Delivery of sites	<p>New policy or addition to HO2 to tackle sites with permission which have not progressed.</p>	<p>The Council while understand the issue raised do not think it appropriate to include an additional policy on this matter.</p> <p>The Local Planning Authority will work proactively with developers and land owners to ensure delivery of sites and will monitor delivery through the Annual Monitoring report</p>	170

**Appendix 7S – Summary of Comments Received and Council Response to the Publication Draft Consultation
Sustainability Appraisal**

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue.)</i>	Council's Response	Respondent
Sustainability Appraisal			
Section 1	1. Apparent lack of a Sustainability Appraisal in relation to affects on Ilkley	<p>The Core Strategy was supported by sustainability appraisals at key stages of its preparation.</p> <p>The Publication Draft was supported by a full Sustainability Appraisal in line with NPPF and Guidance. The Final SA considered the reasonable alternatives (spatial options) and the assessment of the publication Draft development Strategy and Policies.</p> <p>The role of Ilkley was tested as part of the spatial options.</p>	122, 169
Section 1	2. The plan does not meet Sustainability Appraisal objectives due to the scale of development and mitigation.	<p>The Sustainability Appraisal sets out the assessment of the Publication Draft and the degree to which it performs against the sustainability objectives.</p> <p>The provision of development to meet the needs of the community for homes and jobs as well as infrastructure is a key element of ensuring sustainable future communities.</p>	74

**Appendix 7T – Summary of Comments Received and Council Response to the Publication Draft Consultation
Evidence Base**

Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue.)</i>	Council's Response	Respondent
Section 3	General		
Section 2	1. Evidence base is not proportionate – conflict with Para. 158 of the NPPF	The Evidence base is made up of the key documents required by NPPF taking into account the nature of the Development Plan Document and the local issues which it seeks to address.	142, 144, 158, 183, 333, 367, 370, 502
Section 2	2. Selective application of the evidence base	The Core Strategy and supporting background papers in particularly set out how the evidence has been used to inform the strategy and policies.	25
Section 2	2a. No evidence / lack of evidence has been provided to support the proposed number of additional homes	The Housing Requirement for the plan set out in Policy HO1 was informed by the Housing Requirement Study and updates. The approach to determining the housing requirement is set out in supporting text to Policy HO3 as well as Background Paper 2 Housing part 1.	179, 317, 329
Section 2	2b. Evidence for Wharfedale has not been included in the Plan e.g. data from the Local Infrastructure Plan	The Core Strategy text only identifies key infrastructure issues. It is not appropriate or necessary to duplicate the detailed information of the LIP.	452
Section 2	2c. Decisions are made based on inaccurate and out-of-date information	The Core Strategy is based upon the most up to date and appropriate evidence available. The Core Strategy and supporting background papers in particularly set out how the evidence has been used to inform the strategy and policies.	403
Section 2	2d. GVA (Consultants) had a conflict of interest and cannot therefore be relied on to provide an objective assessment of residential housing	The Consultants GVA and Edge Analytics are appropriately qualified to undertake the study. The Council is not aware of any conflict of interest.	317, 369

**Appendix 7T – Summary of Comments Received and Council Response to the Publication Draft Consultation
Evidence Base**

	requirements		
Section 2	Strategic Housing Land Availability Assessment (SHLAA)		
Section 2	1. The SHLAA Update 2013 should have been issued with the Core Strategy	The SHLAA update 2013 was made available online from in advance of the Publication Draft being issued for representations.	339, 340, 366
Section 3	General		
Section 3	1. The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	The Plan is prepared on the basis of meeting the objectively assessed needs for housing development. it also is supported by the Local Infrastructure Plan which seeks to establish the required infrastructure.	362, 375
Evidence Base	Strategic Housing Market Assessment (SHMA)		
Strategic Housing Market Assessment	1. Bradford's Local Plan is afflicted by error and faulty logic which fails to address the housing needs of the population. The data does not appear to be a sound basis upon which to plan housing development.		
Strategic Housing Market Assessment	1A. The SHMA document contains inconsistencies and inaccuracies in the figures given at different points and query some of the modelling and calculations used in the underpinning research.	It is considered that the Core Strategy is based on robust evidence and data, including the SHMA 2013 and Housing Requirements Study. The SHMA was prepared in accordance with national planning policy and guidance. The SHMA was updated in 2013 to provide an up to date and robust evidence of housing need. The Core Strategy Publication draft has been informed by the SHMA update report 2013. In addition the Council has commissioned an independent Housing Requirement Study which considers the latest Government issued household projections. The Core Strategy Publication Draft has also been informed by this work and its conclusions.	488
	2a. In its treatment of Wharfedale the report	The SHMA identifies that there are a number of	488

Appendix 7T – Summary of Comments Received and Council Response to the Publication Draft Consultation Evidence Base

	<p>departs clearly from the evidence. The report combines Wharfedale (Area 1 in terms of AHEVA property prices) with Craven (Area 3) and persistently calls the combined area 'Wharfedale'. This is misleading</p>	<p>sub areas within the District which exhibit broadly similar housing market characteristics SHMA sub-areas were derived by considering a range of ward-level data relating to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Housing market function (through the review of migration patterns, travel to work and house prices); and <input type="checkbox"/> Housing market typology (through the review of dwelling stock attributes and household characteristics) <p>These were considered as an appropriate sub area breakdown of the district</p> <p>AHEVA value areas were based on research using Land Registry data at a Postcode Sector level</p>	
Evidence Base	Affordable Housing Economic Viability Assessment (AHEVA)		
AHEVA	<p>1. Bradford's Local Plan is afflicted by error and faulty logic which fails to address the housing needs of the population. The data does not appear to be a sound basis upon which to plan housing development</p>		
AHEVA	<p>1a. Query some of the modelling and calculations used in the underpinning research.</p>	<p>The AHEVA 2010 was based on detailed research and evidence which was tested with stakeholders.</p> <p>It is considered that the Core Strategy is based on robust evidence and data, including the AHVEA and more up to date evidence of viability in the Local Plan viability Assessment.</p> <p>The approach was in line with national guidance and good practice.</p>	488

**Appendix 7U – Summary of Comments Received and Council Response to the Publication Draft Consultation
Habitats Regulations Assessment**

Section/Policy Ref/Settlement/ Policy Omission Title	Issue and Sub-Issues (Separate row for each issue/sub issue.)	Response (analysis and conclusion)	Respondent
HRA Report and approach	1. Overall approach to Habitats Regulation Assessment (HRA), particularly screening stage & criticism of conclusions in HRA Report of May 2013		
HRA Report and approach	1A. Core Strategy Further Engagement Draft (FED) document stated that an appropriate assessment had been carried out in 2011.	The statement in the CS FED was a drafting error no assessment had been carried out at that stage. Accurate information about the need for screening was provided in the SA.	495, 423 & 447
HRA Report and approach	1B. Screening report produced by Environ was presented as a joint report for the Core Strategy FED and the Waste DPD.	There is no specific mention of the need for a single screening report in Regulation 102 of the 2010 Regulations. Natural England were consulted about the screening report and they accepted the conclusion and raised no issues about this being a report covering 2 separate development plan documents. Separate summary tables were provided to assess the significance of effects of the Core Strategy Further Engagement Draft. The screening report will be published.	495, 423 & 447
	Screening report carried out by Environ in 2012 was not published.	Current guidance states that consultation is not required at the screening stage as a matter of law. Natural England, as the nature conservation body were consulted and the screening document was made available on request. The screening report will be published.	495, 423 & 447
HRA Report and approach	1C. Following well established principles under case law, the screening report must take into account the core strategy as a whole including any necessary safeguarding/ qualifying policy wording. It would appear that this has not been the approach here.	The key role of the screening report is to identify those European Sites where there is a risk of likely significant effects or uncertainty about these and to indicate likely significant effects. The screening report makes a number of recommendations in relation to the likely significant effects identified associated with policies in the Core Strategy	495, 423 & 447

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		Further Engagement Draft and the European Sites screened. Further investigation of a range of likely significant effects was recommended through a stage 2 Appropriate Assessment. In relation to a number of likely significant effects, it was not considered that sufficient work had been done or information gathered, at the screening stage to assess or identify safeguarding measures or to formulate satisfactory qualifying policy wording. However in a number of instances e.g. Policy EN6 and also in relation to ground water, safeguards were assessed and recommendations made. Natural England accepted the conclusions.	
HRA Report and approach	1D. The assessment process has proceeded on the basis that the core strategy has failed the screening test in Regulation 102 of the 2010 Regulations and that an appropriate assessment is therefore required.	The screening report assessing the FED core strategy document produced by Environ recommended further investigation of a range of likely significant effects through a stage 2 Appropriate Assessment. Further screening was carried out as part of the stage 2 assessment by Urban Edge. The role of the screening stage is to identify those European Sites where there is a risk of likely significant effects or uncertainty about these and to indicate likely significant effects. The findings of both screening stages and the need for a stage 2 assessment were accepted by Natural England, as the nature conservation body and by the Council, as the competent body.	495, 423 & 447
HRA Report and approach	1E. Criticism of conclusions in earlier HRA Report released.	The earlier HRA Report had to reach a conclusion based on information available at the time. It was reasonable and necessary in relation to principles governing approach to HRA to base the view on data available at the time and to identify areas of uncertainty.	495, 423 & 447
HRA Report and approach	1F. Having reviewed the HRA of the publication draft core strategy, Natural England consider the screening of likely significant	Support for the compliance of the screening stage with the relevant directives and regulations is noted.	513

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	effects (Stage 1 of the HRA) is compliant with the EU Habitats Directives and national regulations.		
HRA Report and approach	2. Arguments relating to the 'technical' importance of individual bird species, particularly typical SAC species.		
HRA Report	2A. The assessments proceed on the basis that a mobile typical species of a qualifying Annex 1 natural habitat of an SAC is to be regarded and treated in the same way as a mobile qualifying feature of a European Site. This is not correct.	Following review, in the light of updated advice from Natural England and comments received on the earlier report, the position is set out in the revised HRA Report (December 2014) in paragraph 3.6.10: 'Typical species are used to help in assessing impacts on the structure and function of Annex 1 habitat types in accordance with Conservation Objective 7 and should not be regarded as equivalent to Annex II species for which SAC can be selected or confused with species for which the SPA have been classified.'	495, 423 & 447
HRA Report	2B. The use by mobile qualifying features (e.g. a specific identified population of a qualifying bird species for which a SPA is classified; or a specific identified population of a qualifying animal species for which a SAC is designated) of habitat outside the relevant SPA or SAC is relevant to a HRA because those birds or animals themselves (and indeed a specific population of them) are the qualifying feature.	The SPA position is noted. The SAC position is irrelevant as there are no animal species for which the SAC is designated.	495, 423 & 447
HRA Report	2C. By contrast (to mobile qualifying features) the "typical species" of a SAC's natural habitat is not an identified specific population of a named species. They are instead an assortment of species which are directly associated with / functioning as part of the	The revised HRA (December 2014) report states the position in paragraph 3.6.10: 'typical species are used to help in assessing impacts on the structure and function of Annex 1 habitat types in accordance with Conservation Objective 7 and should not	495, 423 & 447

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	qualifying natural habitat within the boundary of the SAC. Typical species are therefore only relevant to a HRA to the extent that they function with the qualifying natural habitat within the SAC for which the SAC is designated. As such impacts on typical species are only relevant to a HRA if they are associated with impacts on the qualifying natural habitat for which the SAC is designated.	be regarded as equivalent to Annex II species for which SAC can be selected or confused with species for which the SPA have been classified.’ The comment is no longer relevant in the light of revisions.	
HRA Report	2D. The HRA has identified bird species which are typical to the South Pennine Moors SAC, these include Twite, Skylark, and Meadow Pipit. Wading birds (redshank and curlew, neither of which are SPA species) have also been surveyed to indicate important grassland sites for biodiversity and therefore of potential value to SPA birds.’ (March 2014)	This comment needs to be viewed in the context of the later advice from Natural England, dated 1 st August 2014 and updates made to the revised HRA Report (December 2014). It is noted that twite, redshank and curlew are included in the breeding bird assemblage.	315
HRA Report	2E.: Issues relating to typical SAC species have extended the scope of the assessment beyond that envisaged or required by Regulation 102 of the 2010 Regulations or by the Habitats Directive. As a consequence of this, too great an emphasis has been given to potential impacts on the habitats of typical species located outside the boundary of the SPA and to the value of habitat outside the boundary of the European site. It is however acknowledged that habitat used outside the South and North Pennine SPAs by mobile qualifying species of the SPAs are relevant to the HRA.	It is noted that the argument that the scope of the assessment has been extended beyond that envisaged or required by Regulation 102 of the 2010 Regulations or by the Habitats Directive is related to arguments being made about SAC typical species. Following review of the HRA report in the light of comments received and updated advice from Natural England and Urban Edge the position is set out in below. Typical species are now being assessed as a component of the structure and function of the SAC habitat types. This focuses the assessment on the habitat within the SAC boundary and removes assessment of offsite habitats for typical species.	495, 423 & 447

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		Most of the 'mobile species' in the original HRA are birds that are now considered as qualifying species for the SPA. The only other bird species that are not SPA species were the red grouse, skylark and meadow pipit. We have removed these from assessment of sites outside of the SPA boundary although have referred to them where Merlin (Annex 1 bird species) have been recorded feeding on them.	
HRA Report	2F. Linked to issue 2E above there are internal inconsistencies within the Report. 'The authors' approach is inconsistent with their own stated approach at paragraph 3.1.2 AA 2014 "...Adverse effects may also occur via impacts to mobile species occurring outside of a designated site but which are qualifying features of the site" (Table 3.1 of the AA 2014 lists those qualifying features, which (correctly) do not include any typical species).	Qualifying features of the site include the breeding bird assemblage, as noted in the revised HRA report (December).	495, 423 & 447
HRA Report	2G. Paragraph 7.4.1 of the AA 2014 considers the impact of the core strategy PD upon the North Pennine Moors SAC 'The author has constructed an argument that impacts manifest upon typical species (Twite and Curlew in this case) from outside the SAC will somehow affect the SAC habitat that supports them. This is clearly not the case as there is no mechanism by which this might occur. While the populations of these birds may be affected by changes to the SAC's qualifying habitat within the boundary of the SAC, the converse is not true.'	Paragraph 7.4.1 of the revised HRA Report (December 2014), which considers the impact of the Core Strategy PD on the North Pennine Moors SAC, has been amended in this respect.	495, 423 & 447

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	<p>2H. Impacts on typical species are only relevant to the extent that they are associated with impacts on the natural habitat of the SAC. The conservation objective document does not require (as it does for qualifying species) maintenance or restoration of ‘populations of typical species’ or of the ‘distribution of typical species within the site’. To the extent that Natural England’s conservation objective documents do make typical species relevant to a HRA, there is no identified population level (eg numbers of pairs or percentage of the UK population) of any specific typical species which must be maintained or restored, in contrast with the position with qualifying species. Therefore even if the authors were to limit, in the assessment, their consideration of typical species (as they should) to the impacts on those species through impacts on natural habitat within the SAC boundary, an adverse impact measured through the typical species would be very difficult to judge.</p>	<p>Following review, in the light of updated advice from Natural England and comments received on the earlier report, the position in relation to typical species is set out in the revised HRA Report in paragraphs 3.6.10:</p> <p>‘typical species are used to help in assessing impacts on the structure and function of Annex 1 habitat types in accordance with Conservation Objective 7 and should not be regarded as equivalent to Annex II species for which SAC can be selected or confused with species for which the SPA have been classified.’</p> <p>Most of the ‘mobile species’ in the original HRA are birds that are now considered as qualifying species for the SPA.</p>	495, 423 & 447
HRA Report	2I. The basis for the typical species chosen by the authors for analysis is insufficiently supported and not accepted.	Some of the typical species of Annex 1 habitat types present within the SAC are identified in Table 3.2 in the Revised HRA Report (December 2014).	495, 423 & 447
HRA Report	3. Interpretation of bird and habitat survey work outputs (Issues relating specifically to SAC typical species have been addressed in above.)		
HRA Report	3A. Arguments relating to potential loss of supporting habitat outside the European site boundaries are not considered to be relevant as these relate to species that are considered	Loss of supporting habitat is relevant in relation to SPA qualifying species, which includes curlew in the breeding bird assemblage.	495, 423 & 447

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	to be 'typical' of the qualifying natural habitats of the SACs.		
HRA Report	3B. Of the qualifying birds species of the SPAs, only Curlew were recorded on the Strategic Housing Land Availability Assessment (SHLAA) sites that were surveyed (Table 5.3 page 47 AA 2014). Curlew is a qualifying species only for the North Pennines Moors SPA (this species is not included in the South Pennines Moors SPA designation) and yet the AA 2014 concludes that there is no adverse effect upon the integrity of the North Pennines SPA (paragraph 7.6.13)	The curlew is an SPA qualifying species in relation to the South Pennine Moors as it is included in the breeding bird assemblage. The conclusions in relation to the North Pennine Moors indicate that, since the SPA boundary is approximately 2.5km north of Ilkley, land brought forward for development is unlikely to have a direct effect on SPA supporting habitat within this area.	495, 423 & 447
HRA report	3C. However, 'the HRA should include evidence that the housing targets for settlements within this distance (ie 2.5km) can be delivered within the subsequent allocations development plan. If sufficient sites, without feeding habitat or evidence of SPA birds are not available, the core strategy's housing distribution may not be deliverable.' (March 2014)	Having reviewed the HRA Report, it is considered that evidence has been provided to indicate that sufficient sites, without feeding habitat or evidence of SPA birds, could be delivered to fulfil the housing targets identified in the Core Strategy.	513
HRA Report	3D. It needs to be noted that, whilst responses have been made to issues raised by Natural England in rep 513, dated March 2014, these issues were raised prior to their acceptance in August 2014 that potential impacts on the breeding bird assemblage needed to be taken into account and prior to their acceptance in December 2014 that satisfactory evidence had been provided in the HRA to support the position taken in the publication draft core	This position is noted. This advice was included in Natural England's response of March 2014. It needs to be considered in the context of later advice dated August 2014 and December 2014.	513

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	<p>strategy. A number of the key issues raised in rep 513 have therefore been superseded in later advice.</p> <p>‘Table 5.3 and Appendix III provide confidence that potential housing sites (identified in the SHLAA) can be allocated without the direct loss or disturbance to SPA birds.’</p>		
Draft HRA Report	<p>3F. typical moorland SAC and SSSI bird species should not be used by themselves to discount allocations and reduce a settlement’s housing or employment target.</p> <p>Note in August 2014 Natural England provided further advice in relation to assessing the potential impacts of housing distribution on the SPA breeding bird assemblage.</p>	This advice was included in Natural England’s response of March 2014. It is considered that this advice has been followed in the updated HRA Report.	513
HRA Report	<p>Natural England’s letter dated 1 August 2014 advised that the HRA should examine whether housing targets in Policy HO3 would result, at the allocations stage, in the loss of functionally linked land used by the breeding bird assemblage (either through direct loss of habitat or indirect disturbance).</p> <p>This assemblage includes curlew and lapwing, the HRA outlines both species have been recorded widely within 2.5km of the SPA (as was favourable feeding habitat). Our representation on the publication draft Core Strategy (dated 31 March 2014) highlighted that significant loss of curlew feeding habitat may occur as a result of the policy HO3 and the</p>		Natural England (updated advice Dec 2014)

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	revised HRA has concluded that adverse effects of policy HO3 cannot be ruled out. Given the strategic nature of the Plan and considering the evidence presented to date Natural England concurs with this conclusion and therefore the requirement for avoidance and/or mitigation measures within the Core Strategy and subsequent development plan documents.		
HRA Report	4. Assessment of recreational pressure, visitor survey data, trampling and urban edge effects		
HRA Report	4A. Population increase in relation to visitor survey outputs and increase in numbers visiting the South Pennine Moors has not been calculated.	Some further work has been carried out in relation to analysing visitor numbers and this is presented in paragraph 5.7.38 of the revised HRA (December 2014).	495, 423 & 447
HRA Report	4B. Insufficient scientific evaluation, particularly in relation to the recreational and other direct impacts alleged to present a threat to the SACs and SPAs from nearby housing development has been carried out or provided to allow reliance on the precautionary principle or to satisfy the view of Sullivan J. Effects of dogs, Trampling and Erosion, Urban edge effects, Fires, Cat predation, and Urbanised Avifana All of the above impact pathways are cited in the AA 2014 however nowhere in the document is there any assessment of whether these impacts have an adverse effect upon integrity of the European sites. As with the previous	Some further assessment in relation to the impact pathways identified has been included in the revised HRA (December 2014). The most appropriate sources of information available have been cited. The majority of research sources quoted in the revised HRA Report relate to an upland context and where data is available relating to the South Pennines, this has been presented and assessed.	495, 423 & 447

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	sections much of the research cited is from studies of lowland heaths and therefore not comparable. Many of the statements are unsupported by any scientific evidence or reference to published literature.		
HRA Report	4C. No attempt is made to assess how the proposed Strategic Housing Land Availability Assessment (SHLAA) sites will affect the overall population levels in the area and what level of additional pressure they will generate.	It is not considered appropriate at this stage to use SHLAA 2 sites as the basis for making detailed calculations of future population at a very local level.	495, 423 & 447
HRA Report	4D. The assessment of recreational data is based too heavily on the southern lowland heaths such as Thames Basin Heath and Dorset Heaths. The lowland heaths of southern England are however not only very different habitats but are also subject to very different recreational pressures.	Further area specific information is presented in relation to recreational pressures on the South Pennine Moors in the revised HRA (December 2014).	495, 423 & 447
HRA Report	4E. The difference in the scale between the lowland and upland European sites, for example, raises questions as to how relevant data, regarding the lowland heather sites, are to the uplands. The Thames Basin Heaths SPA is a dispersed, archipelago European site of just over 8,200 Ha whereas the North Pennine Moors is over 147,000 Ha (see Table 1 below) i.e. more than 18 times the size.	The Rombalds and Ilkley Moors part of the SAC/SPA is 2,528ha in size. Rombalds and Ilkley Moors, an isolated patch of SAC/SPA in the north of the district, is particularly vulnerable to a range of impacts given its size and relative proximity to urban areas on all sides.	495, 423 & 447
HRA Report	4F. Lowland heaths are subject to very different recreational pressures as the nature of the habitat has allowed visitors to create new path across the site over the dry sandy soils. The northern upland moors are mainly based on peat deposits that are wet and not easily	Information is presented in the revised HRA (December 2014) relating to the density of paths through Rombalds Moor. In general terms, the extent to which recreational pressure is confined to paths depends on the type of activity being undertaken.	495, 423 & 447

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	<p>negotiated away from paths. Recreational pressure in the upland moors is therefore generally confined to well used paths that are maintained. The density of paths through the moors is also much lower on the northern upland heaths than lowland heaths.</p>		
HRA Report	<p>4G. The level of visitor penetration into the South Pennine and North Pennine European sites is likely to be very small compared to its total area.</p>	<p>Information is presented in the revised HRA (December 2014) relating to visitor penetration in the South Pennine Moors, which indicates that extensive areas are likely to be subject to higher levels of disturbance.</p>	<p>495, 423 & 447</p>
HRA Report	<p>4H. As stated in paragraph 5.7.3 of the AA 2014 there is no evidence that the current level of recreation is having a negative impact upon the European sites and therefore no evidence of an effect that would warrant the use of the Precautionary Principle.</p>	<p>The South Pennine Moors Integrated Management Strategy and Conservation Action Programme, produced in 1998 was the source quoted in 5.7.3 of the HRA Report of February 2014. This merely stated that at that time research and evidence was inconclusive as to whether or not recreation and access at current levels (i.e. those of 1998) were having a major impact on bird conservation in the South Pennine Moors. It also stated that plans to extend or develop recreational activities in the area must be accompanied by appropriate assessment. As the appropriate assessment for the core strategy, the report presents data and responds to increases in visitor pressure. In the updated report, this information has been superseded by the presentation of more recent information relating to recreation pressure in the South Pennines.</p>	<p>495, 423 & 447</p>
HRA Report	<p>4I. Data that has been gathered on the upland moors quoted in the AA 2014 e.g. Finney et al 2005 (paragraph 5.7.17) refers to data collected from the Pennine Way which is one of the busiest routes on the Moors. While the data showed a disturbance effect in 400m strip either side of the path it does not demonstrate</p>	<p>Information has been presented in relation to the distribution of golden plover and buffered access routes and in relation to penetration distances around access points to indicate areas and corridors of disturbance.</p>	<p>495, 423 & 447</p>

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	and overall impact on reproductive performance of Golden Plover. There is no assessment in the AA 2014 of how these disturbance effects may result in an adverse effect upon the integrity of the SPA i.e. would the population of birds, across the entire site, be limited by such recreational pressure. It is highly unlikely, given the scale of the upland moors, that such localised effects would result in an impact at the population scale.		
HRA Report	4J. Further more detailed analysis of visitor survey data is needed.	Further analysis of visitor survey data has been carried out in the revised HRA (December 2014) and is presented in updated section 5.7.	513
HRA Report	4K. Due to the size of the Natura 2000 site however, the levels of recreational activity vary according to the site's proximity to neighbouring settlements and its accessibility (car access, parking and rights of way). Most notably, Rombalds Moor (including Ilkley Moor) were used more regularly than SPA and SAC moorland areas in the west of the Borough. (March 2014)	Additional information has been presented in the revised HRA (December 2014) relation to differences in patterns of use, accessibility, tracks and paths and recreational disturbance in relation to Rombalds Moor.	513
HRA Report	4L. Given the evidence available, Natural England concurs with the HRA's conclusion that there is significant potential for additional recreational disturbance and trampling of habitat as a result of the strategy's housing policies. Therefore adverse effects on the SPA cannot be ruled out and mitigation is required. (March 2014)	Support for the baseline position, identified in the last report, is noted. Further analysis of recreational disturbance has been carried out and is presented in the revised HRA (December 2014).	513
HRA Report	4M. The HRA contains extensive evidence that the South Pennine Moors SPA and SAC is	Support for the approach is noted.	Updated advice from

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	under considerable recreational pressure. Natural England concurs that policy HO3 (Housing Distribution) will adversely affect the integrity of the South Pennine Moors SAC and SPA due to increased recreational pressure, especially where housing is proposed within settlements in close proximity to Rombalds and Ilkley Moors (within Wharfedale and Airedale). Consequently effective and deliverable avoidance and/or mitigation measures are required to address these effects. (Updated advice – December 2014)		Natural England (December 2014)
5. Overall adequacy of evidence base and conclusions			
HRA Report	5A. Natural England considers the evidence supporting the assessment of the Core Strategy's likely impacts upon the moorland SPAs and SACs is comprehensive. (March 2014)	Support is noted, although some further work in relation to visitor survey data has been carried out and included in the revised HRA (December 2014).	513
HRA Report	5B. In combination effects have not been addressed.	In combination effects have now been addressed more fully in the revised HRA (December 2014).	495, 423 & 447
HRA Report	5C. Need for more information to allow reliable estimate of impacts of housing numbers/ distribution on European site.	The revised HRA (December 2014) provides more clarity about the impact pathways in the HRA that have exercised an influence over settlement housing targets. While the HRA work that has taken place to date is considered to be sufficiently robust in relation to the level of risk and strategic decision making involved in a core strategy, it indicates that more detailed work will take place to inform work on the Allocations DPD.	495, 423 & 447
HRA Report	5D. The AA 2014 should have carried out a review of the potential impacts on the relevant	Later sections of the revised HRA (December 2014) review changes to the plan and avoidance and mitigation	495, 423 & 447

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	European sites based upon the further data collected and assessment of management and mitigation measures.	measures.	
HRA Report	5E. The Bradford Habitat Regulations Assessment concludes that the housing development proposed in Bradford is not free from potentially significant adverse effects on the North and South Pennine Moors SAC and SPA. As such it is not compliant with the Conservation of Species and Habitats Regulations 2010 and NPPF paragraph 119. As the Core Strategy does not fully mitigate the impacts there is a need to show over-riding national need and adequate compensation.	The conclusions have been reviewed and updated in the revised HRA (December 2014) and are now considered to be compliant with the Conservation of Species and Habitats Regulations 2010 and NPPF paragraph 119.	497
HRA Report	5F. The AA 2014 concludes that it is not possible to demonstrate with certainty that the Core Strategy PD will not lead to adverse effects on the integrity of the relevant European sites. On this basis the Core Strategy PD may only be adopted / given effect if the requirements of regulations 103 and 105 of the 2010 Regulations are first met. The AA 2014 provides no comment on these requirements or how they might be met. It is concluded that the Core Strategy PD has very little prospect of lawfully being adopted.	The conclusions have been reviewed and updated in the revised HRA (December 2014) and are now considered to be compliant with the Conservation of Species and Habitats Regulations 2010.	495, 423 & 447
HRA Report	5G. Conclusions indicate that further work is needed during preparation of the Allocations DPD but this has no relevance if the AA is unable to conclude (as is the case) that the core strategy publication draft will have no adverse effect on the integrity of the relevant	The conclusions have been reviewed and updated in the revised HRA (December 2014) and are now considered to be compliant with the Conservation of Species and Habitats Regulations 2010.	495, 423 & 447

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	European sites.		
HRA Report	5H. Natural England concurs with the appropriate assessment's conclusions that – with mitigation and further assessment of the subsequent allocations document – adverse effects upon the North Pennine Moors SPA and SAC, can be avoided. (March 2014)	Support for this element in the conclusions is noted.	513
HRA Report	5I. Given the scale and distribution of development proposed in the core strategy and its proximity to the South Pennine Moors SPA and SAC, adverse effects upon their interest features are harder to mitigate and a clearer solution needs to be in place at this stage. (March 2014) It needs to be noted that, whilst responses have been made to issues raised by Natural England in rep 513, dated March 2014, these issues were raised prior to their acceptance in August 2014 that potential impacts on the breeding bird assemblage needed to be taken into account and prior to their acceptance in December 2014 that satisfactory evidence had been provided in the HRA to support the position taken in the publication draft core strategy. A number of the key issues raised in rep 513 have therefore been superseded in later advice. Given the scale and distribution of development proposed in the core strategy and its proximity to the South Pennine Moors SPA and SAC, adverse effects upon their interest features are harder to mitigate and a clearer solution needs	Support for the premise on which policies and avoidance and mitigation measures in the core strategy are based is noted.	513

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	to be in place at this stage.		
6 Links with Sustainability Appraisal Work			
	6A The SA report (incorporating the requirements of SEA) relies on the flawed HRA and reproduces the errors that have been highlighted above. The SA report cannot therefore be relied upon in respect to the assessment of impacts upon the European sites.	The HRA report has been reviewed and see above for responses to the range of issues identified. It is not considered that revisions made to the HRA are sufficiently significant to have an influence on the sustainability appraisal work which has been a broadly based strategic level assessment.	495, 423 & 447
	6B The data identifying SSSI bird interest features (Curlew and Twite) should inform the Sustainability Appraisal.	This comment needs to be assessed in the light of Natural Englands updated advice of August 2014 and December 2014. However it is agreed that SSSI interest features should inform future sustainability work.	513
	6C Natural England advises that reference to 'exclusion zones' may be misleading and suggests that 'zones of influence' may be more appropriate.	It is noted that the term zones of influence has been used in the plan and in the HRA Report and will inform future stages of plan-making and work on sustainability appraisal.	513

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Section / Policy Ref / Settlement / Policy Omission Title	Main Issue and Sub-Issues Raised <i>(Separate row for each issue/sub issue.)</i>	Council's Response	Respondent
Consultation Information	Consultation Process		
Consultation Information (Page ii & iii)	1. There has not been enough time to make representation	The Core Strategy Publication Draft was published for 6 weeks in line with Regulation 17, Part C - "Statement of Representation Procedure". The Publication Draft document was in the public domain several weeks prior to the formal public consultation commencing as it was published on the Council's Committee minutes website prior to it being presented to the Executive on Tuesday 19 th November 2012 and then agreed by Council on Tuesday 10 th December 2013.	82, 151, 371, 394
Consultation Information (Page ii & iii)	2. The plan conflicts with NPPF paragraph 155 as there has not been enough early consultation and collaboration	The preparation of the Core Strategy has been undertaken in accordance with the Council's adopted Statement of Community Involvement (SCI) and relevant legal and regulatory requirements i.e. Regulation 18 – formally 25. Work on the Core Strategy commenced in 2006/7. During its early preparation the Core Strategy was published for public consultation at the following key stages: <ul style="list-style-type: none"> • Issues & Options (2007) • Further Issues & Options (2008) • Further Engagement Draft (2012) 	10, 15, 18, 19, 20, 21, 30, 31, 131, 155, 333, 449, 450

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		<ul style="list-style-type: none"> • Publication Draft (2014) <p>The Council has published 'Engagement Plans' and post consultation 'Statement of Pre-Submission Consultations' for each stage identifying and recording details of each consultation stage.</p>	
<p>Consultation Information (Page ii & iii)</p>	<p>3. There has been no local public engagement or consultation</p>	<p>See responses to 1 and 2 above.</p> <p>The nature of the Publication Draft consultation is set out within the Engagement Plan (2014).</p> <p>Given the stage and nature of the document the active area based engagement which has been previously undertaken by the Council was not appropriate at this stage of the process.</p>	<p>64, 82, 148, 362,393, 403</p>
<p>Consultation Information (Page ii & iii)</p>	<p>4. Consultation documentation too extensive and complicated</p>	<p>The Core Strategy Publication Draft was supported by the required technical evidence and assessments in order to demonstrate how it met the tests of soundness and compliance with legal, regulatory and policy requirements.</p> <p>In order to make both the process and the document easier for members of the public to understand, the Publication Draft was supported by a summary leaflet, frequently asked questions leaflet and background papers which provided further information to assist with people's general understanding.</p>	<p>82, 92, 115, 118, 119, 120, 122, 133, 151, 159, 183, 198, 199, 337340, 341, 362, 367, 368, 370, 372, 382, 393, 403, 409, 454, 516</p>
<p>Consultation Information (Page ii & iii)</p>	<p>5. Representation process and comment form are complicated and not user friendly</p>	<p>The Council carried out the Publication Draft consultation in accordance with the relevant legal and regulatory requirements and best practice</p>	<p>84, 92, 115, 119, 120, 122, 133, 159, 198, 199, 334, 367, 368,</p>

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		<p>guidance.</p> <p>The Publication Draft representation form was adapted from the official Planning Inspectorate template which is designed to focus the comments of the individual on the soundness and legal compliance of the plan whilst also helping the Planning Inspector at an Examination.</p> <p>The Council provided a supporting guidance notes and a frequently asked questions leaflet which tried to assist those making representations complete the form.</p>	370, 372, 381, 382,393, 401, 403, 427, 545, 504, 516, 518
<p>Consultation Information (Page ii & iii)</p>	<p>6. Baildon library should have been a deposit location for the Core Strategy.</p>	<p>The consultation was undertaken in line with the adopted SCI and relevant Planning Regulations. The Engagement Plan (2014) set out the relevant deposit locations across the District which were limited to the main settlement libraries of Bradford, Shipley, Bingley, Keighley and Ilkley.</p>	339, 340, 366,
<p>Consultation Information (Page ii & iii) Holme Wood</p>	<p>7. Consultation should be extended to include residents in areas adjacent to the development, including people outside the Bradford District.</p>	<p>The Core Strategy has been produced in compliance with the relevant legal and regulatory requirements.</p> <p>The Publication Draft consultation was District wide and included adjoining local authorities and specific consultees, in line with the 2012 regulations (Regulation 20) , the adopted SCI (2008) and Engagement Plan (2014). See also Legal Compliance Checklist (2014).</p> <p>The Duty to Cooperate Statement sets out how the Council has satisfied the ‘Duty to Co-operate’ and worked with key bodies on strategic cross boundary issues including adjoining Local Planning</p>	44, 56, 422,

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		<p>Authorities.</p> <p>This Statement of Pre-Submission Consultation identifies all those bodies and persons invited to make representations at this stage.</p>	
<p>Consultation Information (Page ii & iii)</p>	<p>8. Lack of targeted consultation with young people.</p>	<p>Each consultation stage has been undertaken in line with the adopted Statement of community Involvement (2008) and relevant planning regulations (regulation 18). The Council’s consultee database contains a number of groups and organisations which represent young people – see Appendix 2 of this document. This includes the Council Children’s Service; and members of the Bradford Strategic Partnership Children’s Trust.</p> <p>In addition, during the plan preparation process, consultation and engagement targeted a range of hard to reach groups including young people and also the elderly and minority groups. At the Further Issues and Options stage (2008) the Council specifically undertook a school engagement programme to seek the views of young people on the plan (see School Engagement Project Report, August 2008).</p>	<p>159</p>