

BRADFORD LOCAL PLAN CORE STRATEGY**EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions****Made on Behalf of Persimmon Homes (West Yorkshire)
(Representor ID: 423)*****Matter 6B: SUB AREA POLICIES (AIREDALE)*****Preamble**

1. On behalf of our client Persimmon Homes (West Yorkshire), we write to provide comments in response to the Inspector's schedule of Matters, Issues and Questions in relation to the Bradford Local Plan Core Strategy. This follows our previous comments made on the Publication Draft of the Core Strategy in March 2014.
2. Our client is one of the UK's leading house builders, committed to the highest standards of design, construction and service. They have a large number of site interests across Bradford District and therefore are very keen to engage with the Council and assist in preparing a sound plan which is positively prepared, justified, effective and consistent.

Persimmon Homes Site Interests in Bradford

3. This is a list of our areas where our client has site interests:

Wharfedale

- Menston
- Ilkley/Ben Rhydding

Airedale

- Keighley
- Cottingley

Regional City of Bradford including Shipley and Lower Baildon

- Nab Wood (Shipley)
- Heaton (North West Bradford)
- Daisy Hill (North West Bradford)

4. These statements should be read alongside our previous written representations in relation to the emerging Core Strategy.
5. Our response to Matter 6B, which covers the sub area policies relating to Airedale, is contained in this statement. The responses are with reference the Inspector's headings and questions below:

Policies AD1 and AD2 – AIREDALE

Strategic Pattern of Development

a) Is there sufficient justification and evidence to support the broad distribution of development as set out in Part A of the Policy?

6. Whilst our client supports the premise of focussing some growth in Airedale towards the Principal Town of Keighley, it also has misgivings regarding how the distribution to the rest of the settlements in Airedale has been formulated.
7. In particular it is clear that many of the local service centres (including Cottingley) have had their housing numbers reduced significantly from where it would be if growth were solely based on demographic changes; with housing in Cottingley falling from 395 units to 200 units over the plan period (see Table HO7 of the Core Strategy). The reason to deviate from the demographic modelling is outlined as being based on the following considerations:
 - Land Supply;
 - Growth Study;
 - HRA and South Pennine Moors Birds and Habitats Surveys;
 - Flood Risk and The Sequential Approach to The Distribution of Housing Growth; and
 - Other Factors – Maximising Previously Developed Land/Minimising Green Belt/Delivering Affordable Housing.

8. As outlined in our other statements we believe this approach is flawed in that viability has not been given enough consideration when setting the distribution of development. It is evident from the *Local Plan Viability Assessment* and its update (EB/045 and 046) that many areas of Airedale may not be viable to bring forward for development. On top of this the focus on prioritising brownfield land (outlined in Policy HO6) will act as a further brake on housing land coming forward as many brownfield sites will simply not be viable in the current market. The prioritisation of brownfield land is not in accordance with the principles of the NPPF and is picked up in our response to Matter 7B.
9. Given the pressing need to provide housing in the shorter term and to address the Council's shortfall in housing delivery over recent years (and to achieve and maintain a 5 year supply of deliverable sites), then it is imperative that the Council allows deliverable housing sites to come forward much sooner (and not phased as outlined in Policy HO4). In this instance it is clear that areas such as Cottingley (a Local Service Centre) can deliver additional housing at or even above the level based on demographic changes (395 dwellings or greater over the plan period) and so should be promoted to a Local Growth Centre in the Settlement Hierarchy.
10. We therefore believe there is little justification for the current distribution of dwellings in Airedale and seek that the Council re-examine this policy and allow additional dwellings to emerge in more deliverable areas to compensate for any sites that cannot come forward in more viably compromised areas.

b) Is this element of the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

11. The NPPF in paragraph 47 is clear that it is the local planning authority's role is to 'boost significantly' the supply of housing. Our client is not convinced that the current distribution of housing within Airedale can be achieved given our comments above and so would request that the distribution is examined again and some allowance and flexibility is put into Policy AD1 so that sites in other areas can come forward if delivery in less viable areas cannot be achieved. This would need to tie in with a modification in Policy HO4 and HO6 to remove phasing of sites and amending the prioritisation of brownfield land.
12. Following this it is clearly logical that the Council will need to consider Green Belt release around appropriate settlements. Our client believes that to provide certainty for future development that such release needs to be through the Core Strategy rather than being delayed and considered through an Allocations DPD.

Urban Regeneration and Renewal

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

12. Our client supports that Keighley should be the focus of some development in Airedale (as the Principal Town). The Council however will need to ensure that they are able to deliver the level of housing in the town to support its urban regeneration and renewal goals. This will mean taking a holistic view on development in and around Keighley and where necessary amending Green Belt boundaries to allow viable and sustainable sites to come forward. Areas to the north of Keighley are currently subject to the SPA/SAC buffer zone and so housing growth in relation to this area of the town is restricted. In line with comments in our other statements (see Matters 4C and 3) we believe that in the interest of providing deliverable housing sites and a balanced and sustainable housing market, the Council need to take a view on the necessity of excluding such areas from future development.

13. Our client's concerns relating to the prioritisation of brownfield land within the town (through Policy HO6) which may stifle delivery in Keighley; especially as many of the brownfield sites are constrained and may be difficult to deliver in the town. It is therefore essential that a Green Belt review and consideration of greenfield sites around Keighley is considered fully to ensure the Council's vision for this area can be effectively delivered.

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

14. Our client has no specific comments relating to this area of Airedale outside of our general observations made above. We however reserve the right to comment on this area further in relation to our client's site interests.

c) Is there sufficient justification and evidence to support the specific proposals for development at Silsden, including the specific projects listed, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance between housing and employment land, impact on heritage assets, landscape and local communities, and infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/NPPG)?

15. Our client has no specific comments relating to this area of Airedale outside of our general observations made above. We however reserve the right to comment on this area further in relation to our client's site interests.

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

16. Our client has no specific comments relating to this area of Airedale outside of our general observations made above. We however reserve the right to comment on this area further in relation to our client's site interests.

e) Is there sufficient justification and evidence to support the specific proposals for development at Baildon, including the need for some local release of Green Belt land, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance between housing and employment land, impact on heritage assets, landscape and local communities, and infrastructure requirements (including transport and education facilities), and is it clear,

effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/NPPG)?

17. Our client has no specific comments relating to this area of Airedale outside of our general observations made above. We however reserve the right to comment on this area further in relation to our client's site interests.

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

18. As detailed in our comments above, our client believes that the amount of dwellings proposed in Cottingley within the Core Strategy is too low and should instead at least reflect the requirement based on demographic changes (at least 395 dwellings over the plan period). The settlement is clearly sustainable with good linkages to Bradford and the wider district and so should be promoted from a Local Service Centre to a Local Growth Centre within the Settlement Hierarchy in the Core Strategy. The *Local Plan Viability Assessment* and its update (EB/045 and 046) show that the area in an around Cottingley is more deliverable than other areas of Airedale and given that the Council will need to 'boost significantly' its housing supply to address its needs, make up the shortfall accumulated over recent years and to achieve and maintain a 5 year supply of deliverable housing sites, then it is apparent that scope for additional housing in Cottingley should be allowed; especially if it is the case that other areas in Airedale fail to meet their housing targets and that brownfield sites are not able to come forward. In particular our client's site at land off Bradford Old Road is suitable and able to accommodate additional dwellings for the settlement.
19. It is our client's view that successful development of Cottingley will therefore require appropriate release of Green Belt and that this should be brought forward as part of the Core Strategy rather than being delayed for the Allocations DPD. This will provide more certainty that sites can be delivered and that the Council can meet its housing needs in the shorter term.

Economic Development

20. Our client does not have any specific comments relating to this topic. We however reserve the right to comment on this area further in relation to our client's site interests.

Environment

21. Whilst our client generally supports strategies to improve the environment around Airedale, specific measures for development sites need to take into account the cost and viability of such measures and bearing in mind the advice contained in paragraph 173 of the NPPF which makes it clear that development should not be subject to policy burdens that threaten its viability.

Transport

22. Our client does not have any specific comments relating to this topic. We however reserve the right to comment on this area further in relation to our client's site interests.

Outcomes

23. Whilst the Outcomes contained in paragraphs 4.2.1 to 4.2.5 of the Core Strategy are useful to illustrate how the Council envisages Airedale to be in 2030, in isolation these are of little use. Instead the Council need to explicitly show how the Policy AD1 is going to work in reality especially in the sense of bringing sites forward, reviewing Green Belt boundaries and ensuring development can become viable and ultimately deliverable.