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Dated: February 2015

**Bradford Local Plan  
Core Strategy**

**Response to the Inspector's Schedule of  
Matters, Issues and Questions  
For Examination**

**Matter 6B: Sub-Area Policies - Airedale  
Policies AD1 – AD2 – Airedale**

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On behalf of

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## **1. Response to Matter 6B Policies AD1 – AD2 – Airedale**

### **Strategic Patterns of Development**

#### **Question 6.4a**

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

- 1.1 It is maintained there is not sufficient justification and evidence to support the broad distribution as set out in Part A of the Policy, particularly in relation to the quantum of development proposed in the Local Growth Centre of Steeton.
- 1.2 The proposed distribution to Steeton is 700 dwellings when Silsden, the other Local Growth Centre in Airedale has a proposed distribution of 1,000 dwellings yet is reliant on the public transport connections located in Steeton.
- 1.3 The Council's own evidence set out in the Bradford Growth Assessment (November 2013) identifies that Silsden has no rail station and no high frequency bus service. In contrast, Steeton has a rail station and a high frequency bus service. Steeton is therefore the most sustainable Local Growth Centre given the range of sustainable transport options available without the need for further infrastructure improvements and provides access to the Regional City and other nearby settlements.
- 1.4 The Council in their supporting evidence has not demonstrated why the lower distribution proposed for Steeton, compared to Silsden, is the most appropriate option. Particularly as Steeton is the more sustainable settlement. In contrast, the settlement table for Airedale identifies a proposed distribution to Bingley of 1,400 dwellings, twice the amount proposed in Steeton. Bingley also has rail and high frequency bus services. This further demonstrates the proposed distribution for Steeton appears to be too low.
- 1.5 The Growth Assessment identifies the quantum of land surrounding settlements that would be available unconstrained from development. In Steeton, there are 146.48 ha of unconstrained land, and a further 259.74 ha where there is a partial policy constraint of which 174.22 ha is unconstrained. Land supply is not therefore a constraint in this area.
- 1.6 In the Housing Background Paper (Part 1) the Council sets out information relating to the proposed distribution. This identifies that adjustments were made to the distribution to Addingham, Ilkley, Burley in Wharfedale, Menston and Silsden (eastern part) as a result of the imposition of South Pennine Moors Special Protection Area (SPA).
- 1.7 Barratt David Wilson Homes do not consider that the re-distribution of housing from the settlement in Addingham is justified, and this is addressed in the statement prepared by Rural Solutions on their behalf. At paragraph 5.17 it is advised that reductions in housing targets in the settlements above have

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inevitably had to be 'paid for' via a modest redistribution to the Regional City. However, if re-distribution is necessary and justified, it should be settlements that are sustainable and where development is viable. In this regard, there are deliverability issues in Bradford and as such the Council should consider other sustainable settlements where development is viable, such as Steeton. No consideration appears to have been given to this option.

- 1.8 The Housing Background Paper (Part 1) also provides tables setting out the changes in the proposed distribution along with a commentary. For most settlements a detailed commentary is provided with details of the settlements constraints. The commentary for Steeton is very short and no specific constraints are identified.
- 1.9 The settlement table in the Housing Background Paper also indicates that a distribution of 800 houses was proposed at the Further Engagement Draft Stage, compared to the 700 houses now proposed. No evidence or justification has been provided in the Paper which supports this reduction.
- 1.10 Given the settlement of Steeton is highly sustainable and arguably the most sustainable of all the proposed Local Growth Centres, an appropriate amount of housing development should be distributed to Steeton in accordance with its role and function. It is maintained the proposed distribution is not supported by the evidence which demonstrates this to be a highly sustainable settlement which can readily accommodate additional housing development.
- 1.11 The NPPF provides clear support for development in sustainable locations. The 11<sup>th</sup> Core Planning Principle set out in paragraph 17 states that planning should:-
- “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.”*
- 1.12 Paragraph 30 of the NPPF also relates to development in sustainable locations, it states:-
- “Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”*
- 1.13 The NPPF therefore supports development in sustainable locations where there are a range of sustainable transport options. As a highly sustainable settlement, the evidence does not support the distribution of a lower amount of housing development in Steeton, when Silsden is less well connected and indeed reliant on the transport links located in Steeton, yet has a higher proposed distribution.
- 1.14 As set out in our representations to the Publication Draft, a distribution figure of 1,500 dwellings is proposed for Steeton, which also takes into account an alternative housing requirement figure. However, in the event the Inspector

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supports the Council's housing requirement figure, at the very least the proposed distribution to Steeton should be in line with proposed distribution to Silsden or arguably a similar level to Bingley given its sustainable nature.

- 1.15 On the basis of the case set out it is maintained the proposed distribution to Steeton is not justified. There is clear evidence that would support a higher distribution, particularly given the emphasis in the NPPF for development in sustainable locations and as such the proposed approach is not justified and deemed to be in conflict with national policy.

**Question 6.4b**

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

- 1.16 With the exception of Keighley, the distribution proposed by the Council for the settlements in Airedale would appear at a simplistic level to be deliverable based on the capacity identified in the SHLAA. However, as set out in our response to Question 6.4a, we do not consider the proposed distribution is sound. It is maintained a higher level of distribution should be proposed for Steeton of 1,500 dwellings (which is also based on a higher overall requirement figure as set out in our representations to the Publication Draft). It is argued that at the very least, given its sustainable the proposed distribution should be aligned with Silsden. Based on the SHLAA sites and the strategic land parcels identified in the Growth Assessment, a higher level of housing growth than proposed by the Council for Steeton would be deliverable.
- 1.17 In relation to Keighley, the Council identify in the settlement tables which form part of the Housing Background Paper (Part 1) that there are potential issues relating to deliverability of sites with concerns regarding the marginal viability of developments in the current market. Barratt David Wilson Homes are currently building out a 190 unit scheme in Keighley which was started 3 years ago and therefore they are directly aware of the market conditions in this area and support the Council's concerns regarding marginal viability in this area. Despite the Council acknowledging such concerns, this does not appear to have influenced the proposed distribution to Keighley.
- 1.18 Whilst there may be sufficient SHLAA capacity to meet the proposed distribution in Keighley, there is a risk the objectively assessed housing need will not be met in the event there are sufficient deliverable sites to meet the proposed distribution of 4,500 dwellings in Keighley. The Council should therefore consider distributing additional dwellings to other sustainable settlements within Airedale to ensure flexibility within the sub-area and to ensure the objectively assessed need can be met.
- 1.19 As set out in relation to question 6.4a, the proposed distribution is not considered to be justified, as for Steeton, the low proposed distribution is not the most appropriate strategy when considered against the reasonable alternatives given the evidence relating to the sustainable nature of this settlement.

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- 1.20 To be consistent with National Policy and in particular Core Planning Principle 11 (paragraph 17) and paragraph 30 of the NPPF, the Council approach should seek to direct development to locations well connected by sustainable modes of transport. The proposed level of distribution to Steeton is not deemed to be consistent with national policy in this regard as it is a highly sustainable settlement which could accommodate a higher level of growth, yet other Local Growth Centres are proposed to deliver a high number of dwellings, yet they do not have the same level of public transport connectivity.

## **Urban Regeneration and Renewal**

### **Question 6.5d**

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

- 1.21 Part B of Sub-Area Policy AD1 (Airedale) relates to urban regeneration and renewal and new housing provision. For Steeton reference is made to the creation of 700 new homes, which, as set out previously, we consider the evidence supports a higher level of distribution.
- 1.22 This part of the policy acknowledges that some local green belt changes will be required in sustainable locations. We support the acknowledgement that some location green belt changes will be required, and the policy accords with the NPPF in seeking to ensure sites identified for development are in sustainable locations.
- 1.23 There is clear evidence from the SHLAA and the Growth Assessment there is sufficient unconstrained land around Steeton to meet the proposed distribution or indeed a higher level of distribution. However, there are insufficient brownfield and non-Green Belt sites to meet the proposed distribution, as is the case in the majority of settlements around Bradford District. Steeton is not therefore usual in this regard, as due to the quantum of proposed housing development required across the District to meet the objectively assessed need, Green Belt release is necessary.
- 1.24 It is maintained that Steeton is an appropriate location for Green Belt release given it is identified as a Local Growth Centre in recognition of the range of facilities within the settlement and its public transport connectivity.
- 1.25 It is maintained there would be an appropriate balance between housing and employment land with the hospital being a major employer for local residents. Housing development in this settlement will support the hospital, which is

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acknowledged in the Growth Assessment to be an important part of the local economy.

- 1.26 Policy EC3 identifies that 30 hectares of employment land are to be identified within the Airedale Corridor. Given the public transport links in place in Steeton, residents in this settlement would be able to access employment throughout Airedale and in the Regional City. In addition Part B of the Policy identifies that a Rural Business Park is to be delivered in neighbouring Silsden, which Steeton residents would be able to easily access.
- 1.27 With regard to Infrastructure, it is proposed to provide good walking and cycling links to the railway and bus interchange station with improved accessibility for neighbouring residents of Silsden. In relation to other infrastructure needs, the Growth Assessment for Steeton concludes that new housing development in this settlement will help to address shortfalls in education capacity, public open space and recreation. In this regard, the delivery of additional houses will assist in addressing infrastructure requirements.
- 1.28 Overall, it is considered there is sufficient justification to support the specific proposals for development in Steeton. Whilst we do not consider the amount of housing proposed to be distributed to Steeton is sound, with regard to the need for Green Belt release and the specific projects listed, it is considered the Council has given due regard to the various factors outlined in question 6.5d, particularly as part of the Bradford Growth Assessment, which forms part of the Council's evidence base.

## **Outcomes**

### **Question 6.9a**

**Is there a reasonable or realistic prospect of the Outcomes set out in the Plan (paragraphs 4.2.1 – 4.2.5) actually being delivered by the end of the Plan period, and what measures are in place to monitor success or enable contingencies to be put in place?**

- 1.29 For Steeton, the outcome envisaged for 2030 is a settlement full of character with Airedale Hospital providing an excellent range of employment opportunities. There will have been high quality housing and commercial led mixed use development which will have assisted in providing safe and attractive pedestrian and cycle links to Silsden and Steeton railway station with fast and frequent train services to employment and retail centres of Keighley, Skipton and Regional Cities of Bradford and Leeds.
- 1.30 It is considered reasonable and realistic given the policies in place throughout the Core Strategy which support employment opportunities, housing development and mixed use development in this settlement in principle. Whilst we maintain our objection to the proposed level of housing in Steeton as the evidence clearly supports a higher level of housing, it is considered that in general the proposed outcomes are reasonable and realistic. Steeton is considered to be a good market area where there is market demand and as such the Council can be confident regarding the deliverability of developments in this area.

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1.31 The only part of the outcomes that may not be reasonable or realistic relates to the reference to fast and frequent train services, as ultimately the speed and frequency of train services is not something that is within the Council's direct control.